



Safer and Supportive Salisbury Privacy and Data Protection Policy

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1 Background

Safer and Supportive Salisbury works together towards creating a safe, supportive and inclusive community for everyone who lives or works in the city and for all visitors to Salisbury and surrounding areas. Safer and Supportive Salisbury (SaSS) is a totally independent, non-political, not for profit CIO with charitable status from the Charity Commission of England and Wales..(charity no 1205459) The CIO is supported by a network, members of which represent local community groups, charities or are active in the Salisbury area as individual volunteers. The network may include local representatives of statutory services such as Salisbury City Council, Wiltshire Council, Wiltshire Police and the NHS . The CIO undertakes or facilitates action to influence and shape outcomes that support our aims, fostering a community spirit and make Salisbury and South Wiltshire a better place to live and work.

2 Key Principles

- a) 1 We will treat all those with whom we work and interact with dignity and respect
- b) 2. We will be non-sectarian and not show any religious or party political affiliation
- c) 3. We will maintain confidentiality of all personal materials and information with which we are entrusted
- d) 4. We will only make public, publish or otherwise divulge materials and information with agreement and full informed consent by those who provide it
- e) 5. We will work with all who share our objectives in the furtherance of the group's work

3 Introduction

The aim of this document is to provide guidance and protection for members of Safer and Supportive Salisbury, volunteers and participants in the project to ensure their privacy, security of their personal information and safeguarding of their person. All who work with SaSS will be required to adhere to the contents of this document.

4 Data Protection Policy

- a) All personal data should be processed in accordance with the legislation and this policy. Processing includes obtaining, holding, maintaining, storing, erasing, blocking and destroying data.
- b) Personal data is data relating to a living individual. It will not include data relating to a company or organisation, although any data relating to individuals within companies or organisations may be covered. Personal data can be factual (for example a name, address or date of birth) or it can be information about that person, their employment, actions and behaviour.
- c) Examples of personal data are names and addresses and other information relating to individuals, any third party data and any recorded information including any recorded telephone conversations, videocalls or emails
- d) Individuals should only process data if they have consent to do so.
- e) Individuals who process data on the project have a responsibility for processing personal data in accordance with the legislation. Anyone who has responsibility for processing personal data must ensure that they comply with the data protection principles in the legislation. These state that personal data must:
 - i. be obtained and used fairly and lawfully;
 - ii. be obtained for specified lawful purposes and used only for those purposes;
 - iii. be adequate, relevant and not excessive for those purposes;
 - iv. not be kept for any longer than required for the project and set out below;
 - v. be used in a way which complies with the individual's rights (this includes rights to prevent the use of personal data which will cause them damage or distress, to prevent use of personal data for direct marketing, and to have inaccurate information deleted or corrected);
 - vi. be protected by appropriate technical or organisational measures against unauthorised access, processing or accidental loss or destruction;
 - vii. not be transferred outside the UK unless with the consent of the data subject or where the country is determined to have adequate systems in place to protect personal data.

5 Data Retention Policy

- a) We will take appropriate technical and organisational steps to guard against unauthorised or unlawful processing. Access to such records will be restricted.
- b) Where personal data needs to be deleted or destroyed adequate measures will be taken to ensure data is properly and securely disposed of. This will include destruction of files and back up files and physical destruction of manual files. Any manual sensitive data will be shredded.

- c) All data will be stored in a secure location and precautions will be taken to avoid data being accidentally disclosed.

6 Data Breach

- a) Every care is taken to protect the data we hold. Compromise of information, confidentiality, integrity or availability may result in harm to individuals, reputational damage, detrimental effect on service provision, legislative non-compliance and financial penalties.

An incident includes but is not restricted to:

- i. Loss or theft of personal data or the equipment on which the data is stored e.g. laptop, memory stick, smartphone, or paper record
 - ii. Theft or failure of equipment on which personal data is stored
 - iii. Unauthorised use of or access to personal data
 - iv. Attempts to gain unauthorised access to personal data
 - v. Unauthorised disclosure of personal data
 - vi. Website defacement
 - vii. Hacking attack
- b) In the event of a data breach, this should be reported to the SaSS Administrator on sassalisbury5@gmail.com. This will be reported to the Designated Trustee who will investigate. Appropriate steps will be taken immediately to minimise the effects of the breach. An assessment will be carried out to establish the severity of the breach and the nature of further investigation required. Consideration will be given as to whether the police should be informed. Advice from appropriate experts will be sought if necessary. A suitable course of action will be taken to ensure a resolution to the breach.

7 Data Complaints Process

The Trustees of SaSS take your privacy concerns seriously. If you have any concerns about the way your information is being handled, please contact the SaSS chair without delay. Contact details as follows:

Email address anneinbemerton@gmail.com

We will carefully investigate and review all complaints and take appropriate action in accordance with data protection legislation. We will keep you informed of the progress of our investigation and the outcome. If you are not satisfied with the outcome, you may wish to contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

8 Information Security Policy

All appropriate technical and organisational methods will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. All data will be stored in a secure location and precautions will be taken to avoid data being accidentally disclosed.

9 Privacy Notice

- a) Your privacy is important to us. We are committed to safeguarding the privacy of your information. We collect your personal data to help us to develop the charity, its projects and to communicate with you. We will only make public, publish or otherwise divulge materials and information with your agreement and your full informed consent.

- b) In furtherance of the charity and its projects and with your informed consent, we may collect:
 - i. Personal information (such as name, date of birth, address, telephone number and email address).
 - ii. Characteristics (such as gender, ethnicity, language, nationality, country of birth).
- c) We need to use your personal information to make and maintain contact with you in the furtherance of the charity and its projects. We will not share your information with third parties without your consent unless the law requires us to do so.
- d) Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information contact the SaSS Administrator at sassalisbury5@gmail.com.
- e) You also have the right to:
 - i. object to processing of personal data that is likely to cause, or is causing, damage or distress
 - ii. prevent processing for the purpose of direct marketing
 - iii. object to decisions being taken by automated means
 - iv. in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
 - v. claim compensation for damages caused by a breach of the Data Protection regulations.
- f) Under the Data Protection Act 2018, you have rights as an individual which you can exercise in relation to the information we hold about you.
- g) You can read more about these rights on the ICO website - see link below: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>
- h) Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

10 Confidentiality

Confidential information is information entrusted by an individual in confidence, where there is general obligation not to disclose that information without consent. Information will be disclosed to those who have a legitimate need to know in order to fulfil aspects of the project. Confidential information may include personal information such as name, age, address, personal contact details and details of employment past or present.

An accepted principle is that all personal information must be treated as confidential so we will not disclose this to others or on social media to protect your interests and safety.

11 Gaining Informed Consent

Before we collect data about you, we will seek fully informed consent from you to do so. Please read this policy and feel free to ask the SaSS volunteer any questions of clarification if anything is not clear to you.