



Aim of Policy

This policy applies to the processing of personal and sensitive data by or on behalf of Your Sanctuary.

Personal Data and Sensitive Personal Data

Personal data means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

The definition of sensitive personal data is data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

Policy Statement

We are committed to protecting any personal and/or sensitive personal data that we hold and to ensure that it is treated in a confidential and sensitive manner. All staff and volunteers will have the information they need to understand how to handle data appropriately and with due regard to individuals' rights.

Article 5 of GDPR requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and



f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Individuals have rights under the GDPR as follows and Your Sanctuary is committed to upholding these rights when processing personal data:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Procedures

GDPR specifies 7 lawful bases for processing personal data:

- Consent
- Contract
- Legal Obligation
- Vital Interests
- Public task
- Legitimate Interests
- Special Category data
- Criminal offence data

Clients:

The lawful basis under which we process personal data of our clients is consent which we must obtain at the earliest opportunity and ensure that it is clear, explicit, and specific. If there are any exceptions these will be outlined separately in this policy.

With effect from May 2018, consent forms that explain individuals' rights, why we are holding their personal data, what we intend to do with it and how long we intend to keep it (also known as privacy information) must be used for each individual and must be stored in the client, employee or volunteer file either electronically or as a hard copy. The form will also detail how individuals' can withdraw their consent. This will be used for all new service users and volunteers and, where practical, for existing service users and volunteers.



As per the Your Sanctuary Confidentiality Policy all client information remains confidential and will only be disclosed to third parties with the consent of the client. However, in the event of perceived high risk of an adult or child protection issues, Your Sanctuary staff may be required to disclose information, in line with relevant legislation.

Supporters:

The lawful basis under which we will process the personal data of our supporters is consent and/or legitimate interests (which includes provision of information about our services, fundraising activities, management of relationships with our volunteers, donors, supporters and for compliance with any laws, rules and regulations which may be applicable). When you give us a donation or agree to support us in other ways we will ask for your information which we will use to manage your engagement with us. We may send you information about what we do with the support we receive, or information to support your event and to record how you would like to hear from us.

Your Sanctuary will take such steps as appropriate (including training) to ensure that all staff, volunteers, supporters and clients are aware of both their rights and obligations and Your Sanctuary's rights and obligations under the regulations, and the implications of processing personal data.

Under the GDPR individuals should be informed that they can make a formal request for the following information:

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information – this largely corresponds to the information that should be provided in a privacy notice

Requests made by individuals for copies of their personal data should be made in writing. Your Sanctuary must process this request within 1 month from receipt of written request, and will be free of charge. We will only disclose information that we have processed that has not originated from a third party .

Data security

Your Sanctuary is committed to ensuring that we process personal data securely by means of appropriate technical and organisational measures. This includes our IT systems and databases, as well as the security of our offices and filing cabinets. More information is included in the Staff Handbook and following policies:

CCTV policy
Clear Desk Policy



Computer Screen Security Policy
Confidentiality Policy

Data Sharing

Your Sanctuary can share data with other appropriate agencies and should be done in accordance with the MAISP (Surrey multiagency Information Sharing protocol), the Your Sanctuary Partnership Working Policy and Confidentiality Policy. Requests for personal information, as well as the reason for the request, should be submitted in writing.