

Haven West Berkshire/Newbury Soup Kitchen

GDPR Policy

Our contact details

Name: Haven West Berkshire/Newbury Soup Kitchen (“Haven/NSK”)

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Purpose of the Policy

The policy is intended to demonstrate that Haven/NSK recognises that it is provided with, collects, holds and processes important personal information, including basic data such as contact details, but furthermore sensitive personal material, considering that clients and service users, as well as volunteers, may have issues with mental health, addiction or be in other sensitive situations.

In addition to normal confidentiality, compliance with the Policy is an important aspect of Haven/NSK’s profile, as it demonstrates that we take seriously the confidence placed in us by service users and volunteers. It supports the culture of treating each person and their issues with compassion and professionalism.

Key terms

Data: this is any information about a person or entity which might be collected, sent to, held or processed by Haven/NSK.

The data controller: Haven/NSK, or “us”

Data protection law: Any applicable law relating to data, including the European Data Protection Directive (GDPR) and subsequent UK legislation which adopts and/or amends this.

Scope of the Policy

The Policy’s scope is everyone who relates to Haven/NSK, be they a service user, volunteer, other kind of supporter, donor and partner. In short, any person whose data is gathered, sent to, held and/or processed by us.

The Policy should be read in conjunction with Haven/NSK’s Privacy policy which incorporates Data subject rights and other material aspects of relevant legislation. It should also be read in conjunction with our Consent Form.

The information and data may include:

1. Name, address, email and other contact details including phone numbers
2. Notes on how we relate to a person or organisation
3. Personal information, including records of our interactions where these would be required to be recorded, such as our concerns over mental or physical health, abusive or other challenging behaviour.
4. We may be required by law to provide the authorities with information where we believe or suspect on reasonable grounds that an offence may have been or may be committed.

This information may in certain cases be categorised as Special Category Data (SCD), which includes information on a person's religion, sexual orientation, health and political beliefs, among others.

Our conditions for holding and processing SCD, under Article 9 of the GDPR are:

- (a) Explicit consent, as manifest in our Consent Form
- (c) Vital interest, in cases where we may prevent harm or for safeguarding
- (d) We are a not-for-profit body

Data Protection Officer

As a small organisation we do not have a nominated DPO. The Chief Executive and the Board of Trustees share this responsibility.

Data Protection Measures

To meet the requirements of this Policy, we require employees, volunteers and others involved with Haven/NSK to be familiar with and to adopt or implement the following measures.

1. Physical material is kept only in the locked cabinet at 1 Hambridge Lane; the key holder is the Chief Executive with the Chair of Trustees holding a spare.
2. When in transit, physical material will be kept in a locked case or box; the same key rules apply as for item 1.
3. If personal information is given to a volunteer or person by a client or other party, such as their contact details, that volunteer or person must hand over to the leader of the service provision session (or if outside hours at the earliest opportunity) the information if in written form. If taken in electronic form, they should transmit that information to the leader or direct to the Chief Executive and then delete the information from their device. The intermediate step – paper, text or other electronic records – must then be destroyed.
4. Information classified as Special Category Data (SCD) should normally be held only in the locked cabinet/lock box, or on the computer of the Chief Executive and its

- related backup device. These are password and/or biometrically protected and have industry-standard anti-virus and malware scanning software installed. Where particularly sensitive data is held, such as records of incidents involving service users, or for DBS checks, these files should be individually password protected as well.
5. No SCD should be transmitted over email, except in exceptional circumstances and the sender (unless the Chief Executive) should permanently delete the files in question, including "Sent Files". Such SCD should not contain information where the individual in question can be identified by a third party.
 6. Emails should not generally contain any data, as emails should be considered insecure, unless the file in question has been password protected and the password sent to the recipient by another secure means, normally by phone text message.
 7. In the case of an email message, excluding those containing SCD, being sent inadvertently, the sender should as soon as possible contact the recipients and advise them that this receipt is in breach of our GDPR policy and must be deleted immediately and permanently.
 8. All employees, volunteers and partners of Haven/NSK should update anti-virus and other electronic protection programs regularly and report to the Chief Executive and Chair of Trustees if they believe their email or device has been compromised.
 9. The Chief Executive is responsible for checking that the laptop and storage device electronic protection measures are up to date and that quarterly this is verified by our IT provider via an email trail.
 10. Breaches should be reported to the Chief Executive and Chair of Trustees as soon as possible so that action can be taken. This action will be tailored to each situation and will be dealt with at Board level.

We note that Haven/NSK is exempt from registration with the ICO:

<https://ico.org.uk/media/for-organisations/documents/1567/exemption-from-registration-for-not-for-profit-organisations.pdf>