



Street Paws – Data Protection Policy

Lead responsibility:	Street Paws Chair Person
Approved by:	Street Paws Trustees
Operational from:	June 2018
Review due:	June 2019
Legal framework:	Data Protection Act 2018 General Data Protection Regulations 2018 Safeguarding Vulnerable Groups Act 2006

1. Introduction

In order to operate, Street Paws needs to gather, store and use certain forms of information about individuals. This could include members, beneficiaries, contractors, suppliers, volunteers, business contacts and other stakeholders that we are engaged with.

This policy explains how this data should be collected, stored and used in order to meet Street Paws' data protection standards and comply with the General Data Protection Regulations. It ensures that the organisation:

- Protects the rights of our members, beneficiaries, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect the organisation from the risks of a data breach

2. Who and what does this policy apply to?

This applies to *all* those handling data on behalf of Street Paws e.g.:

- Trustees
- Regional Coordinators and other volunteers (members)
- Contractors/third party suppliers

It applies to all data that Street Paws holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

3. Roles and Responsibilities

Street Paws is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for Street Paws is the Chair Person, Michelle Southern. Michelle, together with the trustees, is responsible for the secure, fair and transparent collection and use of data by Street Paws. Any questions relating to the collection or use of data should be directed to the Data Protection Officer.

Everyone who has access to data as part of Street Paws has a responsibility to ensure that they adhere to this policy.

4. Data Protection Principles

Anyone processing Personal Data must comply with the eight Data Protection Principles set out below. You must not breach the Data Protection Principles. If you are in any doubt contact the Data Protection Officer. Data Protection Principles are as follows:

a) We fairly and lawfully process personal data in a transparent way

We will only collect data where lawful and necessary for the legitimate purposes of the organisation.

i): A volunteer's name and contact details will be collected when they first join Street Paws, and will be used to contact them regarding outreach, event and fundraising activities.

Lawful basis for processing this data: The collection and use of data is fair and reasonable in relation to Street Paws completing tasks expected as part of the individual's membership.

ii) The name and contact details of volunteers, suppliers and contractors will be collected when they take up a position, and will be used to contact them regarding group administration related to their role. Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).

Lawful basis for processing this data: The collection and use of data is fair and reasonable in relation to Street Paws completing tasks expected as part of working with the individuals.

iii) An individual's name and contact details will be collected when they make a booking for an event e.g. charity dog walk. This will be used to contact them about their booking and to allow them to participate in the event.

Lawful basis for processing this data: The collection and use of data is fair and reasonable in relation to Street Paws completing tasks expected as part of the booking/event administration.

iv) An individual's name, contact details and other details including financial details (e.g. PayPal details) may be collected at any time, including when booking a place on a Street Paws event or donating funds to support the organisation, with their consent. See 'How we get consent' below.

Lawful basis for processing this data: Consent (see 'How we get consent')

v) The name, address and contact details of a service user/beneficiary may be collected during the course of our outreach activities. This could include e.g. microchipping a pet and recording the owner's details in the secure Petlog microchip database, which we actively support under compulsory microchipping legislation (2016). It could also include recording the owner's phone number in order to liaise with them in relation to facilitating free of charge veterinary care or kennel space for their pet.

Lawful basis for processing this data: The collection and use of data is fair and reasonable in relation to Street Paws completing tasks expected as part of working with the individuals and in undertaking our charitable objectives.

b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

When collecting data, Street Paws will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

c) We ensure any data collected is relevant and not excessive

Street Paws will not collect or store more data than the minimum information required for our intended purpose e.g. collecting phone numbers from members to be able to contact them about group administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of organisational administration.

d) We ensure data is accurate and up-to-date

Street Paws will ask members, volunteers and others to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Officer.

e) We ensure data is not kept longer than necessary

Street Paws will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records). When the intended use is no longer applicable (e.g. contact details for a volunteer who has left the organisation), the data will be deleted within a reasonable period.

f) We keep personal data secure

Street Paws will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected, secure environment.
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.
- Physically-held data (e.g. registration forms) will be stored in a locked cupboard
- Access to data will only be given to relevant trustees and Regional Coordinators where it is clearly necessary for the running of the organisation. The Data Protection Officer will decide when this is applicable and will keep a list of who has access to data

g) Transfer to countries outside the EEA

Street Paws will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

5. Individual Rights

When Street Paws collects, holds and uses an individual's personal data that individual has the following the rights over that data. We will ensure our data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

Individual's rights

- *Right to be informed:* whenever Street Paws collects data we will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- *Right of access:* individuals can request to see the data Street Paws holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. Street Paws will request that members, volunteers and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- *Right to object:* individuals can object to their data being used for a particular purpose. Street Paws will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- *Right to erasure:* individuals can request for all data held on them to be deleted. Data will not be held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
 - There is a legal requirement to keep the data.
- *Right to restrict processing:* individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, we will restrict the data while it is verified).

6. Member-to-member Contact

We only share members' data with other members with the subject's prior consent. To facilitate this, members can request the personal contact data of other members in writing via the Data Protection Officer. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, not financial or health data) and the subject has consented to their data being shared with others in this way.

7. Sharing information & confidentiality relating to Safeguarding

In the event of a safeguarding concern being brought to the attention of the Board of Trustees and/or the nominated safeguarding lead (Fiona Willis, trustee), it is essential that all information pertaining to the safeguarding concern is kept confidential. It is the responsibility of the safeguarding lead to retain all information collected in the course of investigating a safeguarding concern. This information must be kept securely, if held electronically or in a locked system if held manually.

If the safeguarding lead decides it is appropriate to share information obtained in the course of investigating a safeguarding concern with external parties (such as the Local Authorities Safeguarding Team, or Police), the safeguarding lead must keep a record of what is shared, with whom and for what purpose. Further information may need to be disclosed to external parties (e.g. Police etc.) to support their investigations into the concern raised.

Where data is shared it should be done so, where possible, with informed consent. In some instances where it is judged by the safeguarding lead that there is good reason to share information, such as where safety may be at risk, information can be shared without the individual's consent. In such an eventuality a record must be kept of the rationale for sharing without consent.

You should always refer to the Organisation's Safeguarding Policy before you collect and/or disclosure any information relating to Safeguarding incidents.