**SNAPS**

**GDPR Annual Review March 2021**

**Aim**

Review all activities by SNAPS relating to GDPR (General Data Protection Regulation) to ensure they adhere to the seven principles set out in the 2018 UK GDPR Act.

Those principles are:

* Lawfulness, fairness and transparency
* Purpose Limitation
* Data minimisation
* Accuracy
* Storage limitation
* Integrity and confidentiality (security)
* Accountability

**Current Position**

As of March 2021 SNAPS has an updated Data Protection Policy. This is to provide the employees, volunteers, trustees and families using SNAPS’ services with a framework for the lawful, secure and confidential processing of personal data in accordance with the Data Protection Act 2018. The Act has been incorporated into UK Data Protection law in January 2021 after the UK’s withdrawal from the EU.

SNAPS has up-to-date registration under the Data Protection Act with the Information Commissioner’s Office.

The full policy is available on the SNAPS website under the ‘Reporting and Policies’ section.

Additionally, we have appropriate back up documentation in terms of Consent, Data Mapping, Data Access Requests, Personal Data Breach and Trustees Processor Recording.

SNAPS has committed to moving to a new database in the next twelve months. In anticipation of that move this review presents a timely opportunity to refine and update our Data Holding, Sharing and Information Security where needed in line with the seven principles.

Having read and reviewed the current documentation we are certainly compliant in terms of the Information Commissioner’s Office ‘Advice for Charities’. The Chair and Trustees understand the broad issues around GDPR and it is discussed at Board meetings.

There is a plethora of detailed information around GDPR on line which runs to thousands of pages. We need to ensure that all trustees, staff, contractors and volunteers have a reasonable and practical understanding as it relates to their role.

In that respect I feel there are some relatively simple actions that we should take to ensure we are actively striving for excellence in this area.

**Recommendations**

* **Lawfulness, fairness and transparency**

Bi-annually review the lawfulness, fairness and transparency of all data held by SNAPS.

* **Purpose limitation**

Bi-annually review the relevance of all data held by SNAPS.

* **Data minimisation**

Ensure that the contact information we hold relating to parents and families is current. Offer families who are on record, but have not been involved for twelve months, the chance of having their data ‘wiped’. Commit to a bi-annual review and minimisation of data to ensure its’ accuracy, relevance, lawfulness, fairness and accuracy.

* **Accuracy**

Ensure our website is updated contemporaneously and appropriately as documents relating to data are changed.

* **Storage limitation**

Revise how and where we hold data. Consider and agree how long we hold data for and ensure that we only hold date relevant to SNAPS. Edit as appropriate when we do the bi-annual review.

* **Accountability**

Confirm that Lucy is our Data Protection Officer and nominate a Board member to hold that position on behalf of the Trustees.

Confirm and make publicly available a Data Breach Protocol (see below). Communicate this to all staff, contractors and volunteers, ensuring that they understand it.

As we move to a new database, Trustees should be updated and understand how we use it and keep it current in line with GDPR requirements. Lucy/Chris to present to the Board as the new database comes on line.

* **Integrity and Confidentiality**

To communicate to all staff, contractors and volunteers (on at least an annual basis) the rationale and importance of integrity and confidentiality in relation to data protection and to include this in the induction of any new staff.

Address any training or information issues raised.

* **Data Breach Protocol for Staff members, Contractors and Volunteers**

As soon as any breach is discovered it shall be recorded in detail and the DPO and Chair be informed together with the Trustee responsible for GDPR.

Lucy (DPO) to lead on assessment of the breach in liaison with appropriate staff keeping the Chair and Trustee GDPR lead informed of developments.

Lucy, Chris and the GDPR Trustee to agree on the corrective actions needed.

Effective communication of the outcomes to Board members, staff, contractors and volunteers.

Consideration of any practical training issues arising from the breach.

Finally, subject to the formalisation of these recommendations, we should commit to producing a succinct annual review and update to ensure that GDPR continues to be a high priority for SNAPS.

**Paul Rowson** - **March 2021**