

## **SNAPS GDPR ANNUAL REVIEW - March 2025**

### **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**

SNAPS has a clear Data Protection Policy. This is to provide the employees, contractors, volunteers, trustees and families using SNAPS' services with a framework for the lawful, secure and confidential processing of personal data. 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.

Since the last annual review SNAPS has two databases - one holds secure user information and the other is for fundraising. We have refined and updated our data holding, sharing and information security where needed in line with the seven principles.

We have allocated additional weekly staff time to ensure our data holding is current and relevant.

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 in Board meetings.

---

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

In that respect there are some relatively simple actions (outlined below) that we have taken over the last twelve months to ensure we are actively striving for excellence in terms of GDPR.

### **Ongoing Actions since the last Annual Review**

- **Lawfulness, fairness and transparency**

Annually reviewed the lawfulness, fairness and transparency of all data held by SNAPS.

- **Purpose limitation**

Annually reviewed the relevance of all data held by SNAPS.

- **Data minimisation**

Ensured that the contact information we hold relating to parents and families is current. Offered families who are on record, but have not been involved for twelve months, the chance of having their data 'wiped'. Committed to an annual review and minimisation of data to ensure accuracy, relevance, lawfulness and fairness.

- **Accuracy**

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

- **Storage limitation**

Revised how and where we hold data. Considered and agreed how long we hold data for and ensure that we only hold data relevant to SNAPS. Edited as appropriate when we did the annual review.

- **Accountability**

Confirmed that Lucy Owen is our Data Protection Officer and nominated Board member Paul Rowson to hold that position on behalf of the trustees. Confirmed and made publicly available a Data Breach Protocol (see below). Communicated this to all employees, contractors, volunteers and trustees, ensuring that they understood it.

Since moving to two databases, Trustees have been updated and understand how we use them and keep them current in line with GDPR requirements.

- **Integrity and Confidentiality**

Communicated to all employees, contractors, volunteers and trustees (and will continue to do so on at least an annual basis) the rationale and importance of integrity and confidentiality in relation to data protection, and included this in the induction of any new employees.

Committed to addressing any training or information issues on an ongoing basis.

- **Data Breach Protocol for Employees, Contractors, Volunteers and Trustees**

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.

The Data Protection Officer will lead an assessment of any breach in liaison with appropriate employees, keeping the trustee responsible for GDPR and the Chair informed of any developments.

Lucy Owen, Paul Rowson and Chris Eatwell (current GDPR 'leads') will agree on any corrective actions needed. Any outcomes will be communicated to employees, contractors, volunteers, trustees, families using SNAPS' services, supporters and key stakeholders.

Consideration would be given as to whether there were any practical training issues arising from the breach.

**Paul Rowson - March 2025**