

General Data Protection Regulation Policy



Lead Responsibility	Chairperson	Approved by	Board of Trustees
Version	V3	Reviewed	April 2026
Policy applicable to	All stakeholders	Date of next review	April 2027

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1. Policy Statement

SHAWIN is committed to protecting the privacy, confidentiality, integrity, and security of personal information belonging to all individuals who engage with the organisation. The organisation recognises the importance of maintaining trust and confidence in the way personal data is collected, processed, stored, shared, retained, and protected.

SHAWIN aims to ensure that all trustees, employees, volunteers, beneficiaries, community members, visitors, contractors, external stakeholders, and individuals acting on behalf of the organisation understand and comply with their responsibilities under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and associated data protection legislation and guidance.

The organisation acknowledges that personal data must be processed lawfully, fairly, transparently, securely, and only for legitimate organisational purposes connected to the delivery of community support, wellbeing initiatives, safeguarding responsibilities, governance, volunteering arrangements, partnership activities, outreach services, events, communication, and operational functions.

SHAWIN is committed to maintaining appropriate technical, physical, organisational, and procedural safeguards to protect personal information from unauthorised access, loss, misuse, disclosure, alteration, destruction, or inappropriate handling.

This policy applies to all forms of personal information processed by SHAWIN including digital records, emails, paper-based records, safeguarding information, volunteer records, financial records, communication records, partnership documentation, and information held within organisational systems or devices.

2. How to Contact Us

Individuals who wish to access their personal data, correct inaccuracies, raise concerns, make complaints, request information, or enquire about how SHAWIN processes personal information may contact the organisation using the details below.

Contact Method	Details
Email	info@shawin.org
Address	160–162 Cranbrook Road, Heraldic House, 2nd Floor, Ilford, IG1 4PE

Contact Method	Details
Telephone	02086170065 / 07737198947
Website	www.shawin.org

The organisation will respond to data protection enquiries, concerns, or requests in accordance with applicable data protection legislation and organisational procedures.

3. Your Rights Relating to Personal Data

Under UK GDPR and the Data Protection Act 2018, individuals have important rights regarding how their personal information is collected, processed, stored, and used.

SHAWIN recognises and supports the following rights:

Individual Rights	Description
Right of Access	Individuals may request a copy of the personal data held about them and verify that it is being processed lawfully and fairly.
Right to Rectification	Individuals may request correction of inaccurate, incomplete, or outdated information.
Right to Erasure	Individuals may request deletion or removal of personal data where there is no lawful reason for continued processing.
Right to Restrict Processing	Individuals may request restriction or suspension of processing where accuracy or lawful use is disputed.
Right to Object	Individuals may object to processing where there is no overriding legitimate organisational interest.
Right to Data Portability	Individuals may request transfer of their personal data in a commonly used and machine-readable format where applicable.
Right to Withdraw Consent	Where processing is based on consent, individuals may withdraw consent at any time.

SHAWIN recognises that some legal, safeguarding, operational, financial, or regulatory obligations may require the organisation to retain certain information despite requests for deletion or restriction.

4. Exercising Your Rights

Individuals wishing to exercise any data protection rights may contact SHAWIN using the contact information provided within this policy.

The organisation may request proof of identity before releasing personal information or responding to certain requests. This is necessary to protect confidential information and ensure personal data is not disclosed unlawfully or inappropriately.

SHAWIN will normally respond to legitimate requests within one calendar month. Where requests are particularly complex or numerous, the organisation may extend this period in accordance with data protection legislation and will inform the individual accordingly.

In most circumstances no fee will be charged for data access requests. However, the organisation reserves the right to charge a reasonable administrative fee where requests are manifestly unfounded, repetitive, or excessive in accordance with UK GDPR provisions.

5. Communication and Marketing Preferences

SHAWIN may occasionally communicate information relating to community activities, wellbeing initiatives, volunteering opportunities, events, awareness campaigns, organisational updates, partnership activities, safeguarding information, fundraising initiatives, or support services.

Individuals may request to stop receiving non-essential communications at any time by:

- contacting the organisation directly
- using unsubscribe or opt-out arrangements where available
- updating communication preferences where applicable

Operational, safeguarding, governance, legal, or service-related communications may still be issued where necessary for legitimate organisational purposes.

6. Personal Data Collected by SHAWIN

SHAWIN may collect and process personal information necessary for lawful organisational activities, safeguarding responsibilities, governance functions, volunteer management, wellbeing support, community engagement, partnership working, fundraising, operational administration, and service delivery.

The categories of information collected may include the following:

Category of Personal Data	Examples
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Category of Personal Data	Examples
Identity Information	Full name, title, date of birth, photographs, identification documents, DBS information where appropriate
Contact Information	Address, email address, telephone numbers, emergency contact information
Volunteer and Community Information	Volunteer records, participation records, references, safeguarding declarations, support needs
Safeguarding Information	Safeguarding concerns, incident records, wellbeing information, disclosures where necessary and lawful
Equality and Inclusion Information	Equality monitoring information where voluntarily provided
Financial Information	Donation records, grant administration records, payment records where applicable
Communication Information	Emails, correspondence, enquiries, complaints, feedback, referrals, meeting records
Online and Digital Information	Website usage information, online engagement, communication platform records, digital correspondence

SHAWIN will only collect information that is relevant, necessary, proportionate, and connected to legitimate organisational purposes.

7. Information Received from Third Parties

SHAWIN may occasionally receive personal information from third-party organisations where lawful and appropriate to do so. This may include:

- local authorities
- community organisations
- safeguarding agencies
- referral organisations
- statutory services
- funding organisations
- partner agencies
- emergency services
- professional advisers

Information received from third parties will be processed confidentially, securely, and only for lawful organisational purposes connected to safeguarding, wellbeing, community support, governance, or operational activities.

8. How SHAWIN Uses Personal Data

The organisation processes personal information for a range of lawful and legitimate purposes connected to community activities, safeguarding responsibilities, wellbeing support, operational management, volunteer coordination, governance, partnership arrangements, and legal obligations.

Purpose	Reason for Processing
Safeguarding and Welfare	To protect children, vulnerable adults, beneficiaries, volunteers, and community members from harm
Community Support and Engagement	To organise and deliver community initiatives, support services, outreach activities, and wellbeing programmes
Volunteer and Trustee Administration	To manage volunteering arrangements, recruitment, communication, safeguarding checks, and governance responsibilities
Communication	To respond to enquiries, provide updates, maintain records, and communicate organisational information
Health and Safety	To maintain safe environments, record incidents, and fulfil legal responsibilities
Legal and Regulatory Compliance	To comply with charity law, safeguarding obligations, financial regulations, and statutory duties
Governance and Administration	To manage organisational records, meetings, reporting, insurance, and operational oversight
Security and Risk Management	To protect organisational systems, individuals, records, and operational activities

9. Lawful Basis for Processing

SHAWIN processes personal data only where a lawful basis exists under UK GDPR.

The lawful bases relied upon may include:

- consent
- legitimate interests
- legal obligations
- safeguarding responsibilities
- contractual obligations
- vital interests
- public interest activities

Special category data, including safeguarding or wellbeing information, will only be processed where additional lawful conditions are satisfied under data protection legislation.

10. What Happens if Necessary Information Is Not Provided

Where SHAWIN requires personal information in order to fulfil safeguarding duties, legal obligations, volunteering arrangements, governance requirements, or operational responsibilities, failure to provide necessary information may limit the organisation's ability to:

- provide support services
- facilitate participation in activities
- manage safeguarding concerns
- comply with legal obligations
- maintain safe environments
- communicate effectively
- administer volunteering arrangements

The organisation will always seek to explain why information is required and how it will be used.

11. Sharing Personal Data

SHAWIN recognises the importance of maintaining confidentiality and will only share personal information where lawful, necessary, proportionate, and connected to legitimate organisational purposes.

Personal data may be shared with the following categories of organisations where appropriate:

Recipient	Reason for Sharing
Safeguarding and Statutory Agencies	To protect individuals from harm and fulfil safeguarding responsibilities
Local Authorities and Public Bodies	To support lawful operational, safeguarding, funding, or community obligations
Professional Advisers	Legal advisers, accountants, insurers, auditors, or compliance advisers
Service Providers	IT providers, cloud storage providers, communication platforms, or administrative service providers
Emergency Services	Where immediate health, welfare, or safety concerns arise
Funding and Regulatory Bodies	To comply with lawful reporting, governance, or grant conditions

Recipient**Reason for Sharing**

Partner Organisations

Where collaborative activities require lawful and proportionate information sharing

SHAWIN will never sell personal data to third parties.

12. Data Retention

SHAWIN will retain personal information only for as long as necessary to fulfil lawful organisational purposes, safeguarding responsibilities, operational needs, governance requirements, legal obligations, or regulatory requirements.

Retention periods will vary depending on:

- safeguarding requirements
- legal obligations
- operational necessity
- insurance requirements
- charity governance expectations
- financial and regulatory responsibilities

When information is no longer required, it will be securely destroyed, deleted, or anonymised where appropriate.

13. Data Storage and Security

SHAWIN is committed to maintaining appropriate physical, organisational, and technical security arrangements to protect personal information.

Security measures may include:

- password-protected systems
- restricted access arrangements
- confidential record storage
- encrypted digital systems where appropriate
- secure disposal procedures
- safeguarding confidentiality arrangements
- staff and volunteer awareness
- controlled access to sensitive records

The organisation recognises that no system can guarantee absolute security; however, SHAWIN will take all reasonable and proportionate steps to minimise risks relating to unauthorised access, loss, disclosure, or misuse of information.

14. Data Breaches

SHAWIN has procedures in place to identify, manage, investigate, record, and respond to actual or suspected personal data breaches.

Where a personal data breach presents a risk to individuals' rights, freedoms, wellbeing, or safety, the organisation may notify:

- affected individuals
- the Information Commissioner's Office (ICO)
- safeguarding agencies
- regulatory bodies
- other relevant authorities where legally required

The organisation will take reasonable steps to minimise harm, investigate incidents appropriately, and strengthen security arrangements following any breach or incident.

15. Confidentiality

All trustees, employees, volunteers, contractors, and individuals acting on behalf of SHAWIN are expected to maintain confidentiality and handle personal information responsibly, lawfully, respectfully, and securely.

Confidential information must not be disclosed inappropriately, discussed without authorisation, or accessed unnecessarily.

Confidentiality obligations continue after volunteering, employment, partnership arrangements, or involvement with the organisation have ended.

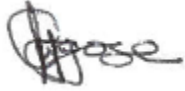
16. Policy Review

This policy will be reviewed annually or sooner where legislative, operational, safeguarding, technological, or organisational changes require amendment.

The Board of Trustees retains overall responsibility for monitoring compliance with data protection legislation and ensuring appropriate governance arrangements are maintained throughout SHAWIN.

Policy approval.

Director's Name: Gertrude Logose

A handwritten signature in black ink, appearing to read "Logose". The signature is written in a cursive style with a large initial "L" and a stylized "G".

Director's Signature

Date: 01/04/2026