

## GDPR Annual Report

**Submission Date: 27<sup>th</sup> November 2023**

**Submitted By: Caryn Nicolson**

**Submitted To: Board of Trustees**

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1. Purpose of the Report: To update on GDPR compliance progress within the 2022/23 operational year.
2. About the Reporting Requirement: Organisations are required to report annually on GDPR compliance in accordance with the new Data Protection Act 2018.
3. Responsible Person(s): Caryn Nicolson
4. Reporting Period: 1<sup>st</sup> April 2022 – 31<sup>st</sup> March 2023
5. Reporting / Notification

Based upon our notification register the following were reported for the year.

- Subject Access Requests – None
- Requests for the Erase of Data – None
- Date Breaches – 3

### Notification

Having reviewed the data breach (as noted in item 5 above) using the ICO's assessment tool and having sought advice, one of the three breaches registered as notifiable given the impact on the individual. For the purposes of organisational performance reporting, notifications are reported to the Board on a quarterly basis.

6. Summary of Policies/Procedures in Place:

Since October 2018, the charity has had in place the following policies.

- Safeguarding policy and procedure and framework
- Using, Managing and Protection Personal Data

For operational management purposes, each year improvement objectives are identified and acted upon unless some substantial reason is given not to do so or prohibits, or delays action being taken.

The actions planned from the previous year for this year are as follows

- Creation of Internet Policy
- Carry out Training of New Staff and Retraining of current staff

Summary of the final year of the 4 Year Action Plan

<b>Year Four (2022)</b>	<b>Action Taken</b>
Internet Policy	(Draft Policy Written)
Carry out an annual audit	(Outstanding)
Reduction of client data stored on SharePoint	(Ongoing)
Creation and Implementation of GDPR fundraising paperwork	(Outstanding)

7. Actions Taken within the Year:

- Action Continued: Electronic & paper data (held in our lockup) was destroyed in line with retention schedule.
- Mobile Phone security reviewed to ensure data is erased prior to reuse
- Ongoing Training

8. Recommendations/Concluding Statements:

The following recommendations are made for the forthcoming year.

- The draft ICT policy should be approved and implemented in the forthcoming year.
- The administration of GDPR and policies should be reviewed to determine proportionate activity in relation to current resources.
- Staff should continue to receive training during their first year of employment and retraining takes place every 2 years.
- An annual audit of one service should be carried out to ensure practice remains robust.