KSAAS
Kent Sexual Assault & Abuse Service
(formerly East Kent Rape Crisis Centre)

GDPR Policy

Policy name:	**GDPR Policy**
Date of approval:	January 2026
Next review due:	January 2027

1. Purpose

The purpose of this policy is to ensure that Kent Sexual Assault and Abuse Service (KSAAS) complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 when collecting, storing, using, and sharing personal data. KSAAS processes extremely sensitive information relating to people who have experienced sexual violence; therefore, privacy, safeguarding, dignity, and trust are central to our service.

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2. Scope

This policy applies to:

- All employees, counsellors, sessional workers, volunteers, trustees, and placement counsellors
- All personal data processed by KSAAS in any form (electronic, written, audio, video)
- All service user, staff, donor, and training participant information

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3. What Data We Collect

KSAAS may process the following personal data:

3.1 Service Users (Clients)

- Name or anonymised ID (depending on service model)
- Contact details (where consented)
- Session notes and support plans
- Risk, safeguarding, and trauma impact information
  This data is classed as *Special Category Data* and receives the highest level of protection.

3.2 Counsellors, Staff, and Volunteers

- Contact details, references, training records
- DBS status, supervision records, HR files
- Emergency contacts

3.3 Training Participants (External and Internal)

- Names, email addresses, organisation details
- Attendance records and evaluations (where given)

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4. Legal Basis for Processing

KSAAS processes personal data under the following lawful bases:

Purpose	Lawful Basis	Notes
Delivering counselling/support services	Explicit Consent	Clients choose whether to provide information; consent can be withdrawn.
Safeguarding and risk management	Vital Interests / Legal Obligation	To protect life or prevent harm.
Staff/Volunteers recruitment and HR	Contract and Legal Obligation	Required to manage employment or placements.
Training administration	Legitimate Interests / Contract	Necessary to organise training activities.
Monitoring, evaluation and anonymised reporting	Public Interest / Legitimate Interests	Data is anonymised wherever possible.

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5. Data Protection Principles

KSAAS ensures that personal data is:

1. Lawful, fair, and transparent
2. Collected for specific and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up-to-date
5. Kept only as long as necessary
6. Stored and processed securely

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6. Confidentiality and Disclosure

Client confidentiality is paramount. Information will only be shared:

- With clear, informed consent, or
- If there is a risk of serious harm to the client or others, or
- If required by law (e.g., court order)

Any disclosure must be:

- Discussed with the Data Protection Lead where possible
- Recorded in the client record

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7. Data Security Measures

KSAAS ensures data is protected through:

- Encrypted digital storage and secure servers
- Password protection and role-based access controls
- Secure email and restricted shared drives
- Lockable physical storage for paper documents
- Confidential supervision practices
- DBS checks and mandatory confidentiality agreements
- Ongoing staff training in trauma-informed confidentiality

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8. Data Retention

Data Type	Retention Period	Notes
Client records (adults)	7 years from last contact	Trauma services standard and legal defence.
Client records (children/young people)	7 years after turning 18	To support safeguarding/legal requirements.
HR & staff files	6 years post-employment	Legal standard.
Supervision & counsellor notes	Aligned to client record retention	Linked for safeguarding clarity.
Training participant data	3 years	For certificates, audit, and evaluation.

Records are deleted securely and irreversibly.

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9. Data Subject Rights

Individuals have the right to:

- Request access to their data
- Request correction or deletion of data
- Withdraw consent (where consent is the lawful basis)
- Request restriction of processing
- Object to data use
- Data portability (where applicable)

Requests are responded to within one month.

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Contact:
Data Protection Lead
Kent Sexual Assault and Abuse Service
Email: info@KSAAS.org.uk

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10. Data Breaches

All suspected data breaches must be reported to the Data Protection Lead immediately.

If a breach is likely to result in risk to individuals, KSAAS will:

- Notify the Information Commissioner's Office (ICO) within 72 hours
- Inform the individual(s) affected where appropriate

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11. Roles & Responsibilities

Role	Responsibility
Trustees	Overall accountability for GDPR compliance
Data Protection Lead	Advises, monitors compliance, manages breaches and subject requests
All Staff, Counsellors and Volunteers	Must comply with this policy and report breaches or concerns immediately

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12. Review

This policy will be reviewed annually, or sooner if legal, operational, or regulatory changes occur.