



INFORMATION SHARING PROTOCOL (“ISP”) FOR Practical Assistance for Individual and Families in Need

IMPORTANT NOTE - if you are an individual [e.g. social worker or caseworker] who receives this ISP, please provide it to someone in your organisation who has authority to sign it below and then return to us, as this ISP will apply to our provision of practical assistance to your service users.

Objectives of our Practical Assistance

As part of its work with local communities, The Salvation Army* (“we” or “us”) provides practical and emotional support to those in need. Our overall aim is to support an individual to be able to address both the immediate crisis they are in but also to address the underlying causes of the crisis. In order to do this effectively, we need to be able to track the support we have given to a person over a period of time. In order to offer such a “person centred approach”, we need to maintain individual records of those we help including the nature of the practical support we give, the signposting we offered as well as details of the agencies we have worked with. We also implement reasonable locally determined criteria for the level of support we are able to give an individual over a period of time. This is another reason why we need to be able to identify who we have supported, even if this is via a third party. Through our 600+ centres, we support hundreds of individuals each week. We need to be able to uniquely identify each individual many of who will have similar names so for this reason we ask for a date of birth as a reliable unique identifier.

We are keen to offer services that meet the needs of our local communities and also to advocate on behalf of these communities. Identifying trends and patterns of need that we are able to analyse on a local level will help us design and deliver programmes that are most beneficial to local communities. We are also concerned to ensure that we support people with disabilities who we legally need to make reasonable adjustments to support. By asking about disability we are able to do this but also to ensure that we are monitoring the overall support we give to disabled people.

This Information Sharing Protocol (or “ISP”)

This Information Sharing Protocol (or “ISP”) applies to all circumstances where third parties (including, without limit, local authorities, housing associations, charities etc.) (“you”) provide personal data of individuals in need of our practical assistance scheme to us and it will apply to all sharing of personal data in respect of organisations where we provide Practical Assistance services for service users referred via those organisations, whether or not it is signed by you. This also includes situations where your social workers and personnel provide details of their clients to us to obtain the practical assistance.

We provide this practical assistance and Practical Assistance services to individuals in need of food, clothing and basic amenities to support the most vulnerable people in society. The practical assistance which we provide under this scheme may include food parcels, utility top ups, clothing, basic amenities etc.

Please note we provide all Practical Assistance services subject to availability and locally determined criteria and without obligation.

The Salvation Army Trustee Company acting on behalf of The Social Work Trust of 101 Newington Causeway, London, SE1 6BN; Data Protection Officer: Tel 0207 367 4500 or at data.protection@salvationarmy.org.uk. Web: www.salvationarmy.org.uk



Unless we otherwise agree in writing, this ISP shall apply to all circumstances where you provide personal data to us of individuals who require our practical assistance. This ISP shall apply to the exclusion of any other terms that you may seek to impose or incorporate, or which are implied by trade, custom, practice or course of dealing (including your standard terms which may be available on your internet site);

How we use Personal Data which you provide to us

We will use personal data which you provide to us to assist individuals by providing the practical assistance described and with the intention of assisting these individuals to improve their lives and *meet their basic needs in time of crisis. Where we are able, we may also offer support to address the root causes of the crisis thus building resilience for the future.* We may also use such personal data on an anonymous basis for programme development and to lobby government for changes to assist individuals in need.

Personal data you provide to us shall comprise name and contact details, date of birth to fully identify an individual in order to comply with our policies on the provision of assistance. In order to ensure assistance is appropriately given, we may also collect employment status, details of household and details of the reason why the assistance is required in order to ensure that appropriate help is given and practical assistance criteria is met. We will process such personal data on the legal basis of legitimate interests and we shall process sensitive or “special category data” (as referred to by law) on the basis of substantial public interest on the basis of UK laws which will be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the individual.

A copy of our privacy notice which we provide to individuals to explain how we use their personal data is available here <https://www.salvationarmy.org.uk/information-sharing-protocol-agencies> and you should provide a copy of this notice to your client before providing their personal data to us. A copy of this and this information Sharing Protocol are both available on our website at: <https://www.salvationarmy.org.uk/information-sharing-protocol-agencies>

We process personal data for our practical assistance scheme in accordance with data protection law and our internal policies, including our Data Protection Policy. We have considered “data protection by design and default” in relation to the provision of third parties and conducted a Data Protection Impact Assessment into the processing of personal data for this scheme and provision of personal data to us by third party organisations such as you. We also have a Retention Schedule, Information Security Policy, Personal Data Breach Procedure.

Provision of Personal Data by you to us

You are responsible for compliance with data protection law for the personal data of individuals that you provide to us. We are responsible for compliance with data protection laws in respect of the personal data once it has been provided to us. Each of you and us shall act as an independent data controller when you provide personal data of individuals to us to obtain practical assistance support for such individuals.

**The Salvation Army Trustee Company acting on behalf of The Social Work Trust* of 101 Newington Causeway, London, SE1 6BN; Data Protection Officer: Tel 0207 367 4500 or at data.protection@salvationarmy.org.uk. Web: www.salvationarmy.org.uk*

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

Republic of Ireland Registered Charity No. CHY6399; Guernsey Registered Charity No. CH318; Jersey NPO0840; Isle of Man Registered Charity No. 267

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle
Anthony Cotterill

Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner



You must ensure that personal data is provided to us fairly and in a transparent manner and with a legal basis to justify the sharing of the personal data. All personal data of individuals which you provide to us must be provided (this list is not exhaustive):

- in accordance with data protection law including without limit, the accountability principle to demonstrate your compliance with the law;
- in accordance with the data protection principles, which we have summarised for your ease of reference below;
- must be reasonable and proportionate;
- with a legal basis for providing the personal data to us;
- in compliance with the ICO Data Sharing Code of Practice which you should consider before providing personal data to us. Please see for more: <https://ico.org.uk>;
- with adequate security and respecting the confidentiality of each individual.

Individual Rights

You will notify us immediately:

- if any individual requests access to their personal data held by us or to exercise any of their rights under the data protection law, including, without limit, to rectify inaccurate personal data or to object to you providing data to us or our processing of the personal data;
- of any complaint by an individual regarding the provision of their personal data to us or processing by us of their personal data given to us by you;
- any data breach (including, without limit, loss or unauthorised access) of personal data of your client, which you have provided to us.

Review of this ISP

We will review our processes and procedures in relation to personal data provided to us by third party organisations for the purposes of provision of practical assistance to individuals in need from time to time or at least every two years.

Contact Details

If you have a Data Protection Officer, please provide contact details to us. Details of our Data Protection Officer are included in the correspondence details below.

Data Protection Principles which should lie at the heart of your approach to processing and sharing personal data with us for our Practical Assistance

The law sets out 7 key principles:

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

**The Salvation Army Trustee Company acting on behalf of The Social Work Trust* of 101 Newington Causeway, London, SE1 6BN; Data Protection Officer: Tel 0207 367 4500 or at data.protection@salvationarmy.org.uk. Web: www.salvationarmy.org.uk*

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

Republic of Ireland Registered Charity No. CHY6399; Guernsey Registered Charity No. CH318; Jersey NPO0840; Isle of Man Registered Charity No. 267

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle
Anthony Cotterill

Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner



- Accountability

SIGNATURE AND AGREEMENT TO THIS ISP:

Please sign this ISP to indicate your agreement and then scan a signed copy of this ISP to us at the email address provided. Please keep a copy for your records. Please note if we provide Practical Assistance services to your service users, we will do so on the basis of this ISP, and this is the case whether or not you have signed it. We cannot be held liable for your failure to consider this ISP when it has been referred to during our contact with yourselves.

I confirm on behalf of, organisation below, our agreement to the terms of this ISP.

Signed:

For and on behalf of ORGANISATION NAME:

Date:

DETAILS OF OUR DATA PROTECTION OFFICER: Mike Eastwell
mike.eastwell@salvationarmy.org.uk

Tony R Daniels

Title: Territorial Director of Community Services

Date: 19/05/2021

SIGNED FOR AND ON BEHALF OF THE SALVATION ARMY TRUSTEE COMPANY IN ITS CAPACITY AS TRUSTEE FOR THE SALVATION ARMY SOCIAL WORK TRUST

**The Salvation Army Trustee Company acting on behalf of The Social Work Trust* of 101 Newington Causeway, London, SE1 6BN; Data Protection Officer: Tel 0207 367 4500 or at data.protection@salvationarmy.org.uk. Web: www.salvationarmy.org.uk*

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

Republic of Ireland Registered Charity No. CHY6399; Guernsey Registered Charity No. CH318; Jersey NPO0840; Isle of Man Registered Charity No. 267

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle
Anthony Cotterill

Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner