



## **Dose of Nature Data Protection Policy**

### **1. Introduction**

Dose of Nature works with vulnerable adults and young people through one-to-one Nature Prescriptions and a range of nature-based group activities.

Dose of Nature recognises the importance of using personal data to achieve its goals; and takes seriously its responsibilities for legal and proportionate use of personal data.

### **2. Purpose and scope**

The purpose of this policy is to provide a framework for the way in which personal data is used (recorded, stored and/or otherwise processed) by Dose of Nature (the Charity) and to give clear guidance to those who hold and process that information.

This policy applies to all Trustees, staff, volunteers, contractors, and clients at the Charity.

### **3. General Data Protection Regulations**

Under UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, data must be:

- Fairly and lawfully processed in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Not kept for longer than is necessary
- Processed in a manner that ensures appropriate security
- Not transferred to another country without appropriate safeguards being in place
- Made available to Data Subjects and allow Data Subjects to exercise certain rights in relation to their personal data

The Charity is responsible for and must be able to demonstrate compliance with the data protection principles listed above (accountability). Data protection applies to computerised and manual systems of information.

This Data Protection Policy applies to all personal data that the Charity processes regardless of the media on which it is stored, or whether it relates to past or present employees, workers, clients, suppliers, website users or any other Data Subject.

#### **4. Purpose and use of data**

Dose of Nature will, when asking people to provide personal information, aim to clearly communicate what information is required, how it will be used, including disclosure to third parties, how it will be stored and how long it will be kept before being securely destroyed. People will also be advised of their rights to access their personal data.

At their assessment, clients will be told how their personal data may be shared within the Charity including with their assigned volunteer, and with any relevant external agencies.

#### **5. Conditions required for requesting and using personal data**

Any personal data that Dose of Nature collects will comply with one or more of the legal bases required for processing:

- Consent (further information on Consent below)
- Legal obligation
- Vital interests
- Public tasks
- Legitimate interests

People will be informed about which legal basis or bases their personal data is being collected and the conditions for processing special category data where that applies.

#### **6. Consent**

A Data Subject consents to the processing of their personal data if they indicate agreement clearly either by a statement or positive action to the Processing. As consent requires affirmative action, silence, pre-ticked boxes or inactivity are unlikely to be sufficient. If Consent is given in a document which deals with other matters, then the consent must be kept separate from those other matters.

Data Subjects must be easily able to withdraw Consent to Processing at any time and withdrawal will be promptly honoured.

The Charity will not take photographs of clients without first gaining their consent. Dose of Nature will also not take photos of volunteer Dose of Nature guides or group leaders in a therapeutic context without first gaining their consent.

#### **7. Special Category data**

Special category data will only be processed where a lawful basis under UK GDPR applies, and an additional condition under the Data Protection Act 2018 is met (for example, provision of care, safeguarding, or explicit consent where appropriate). "Special Category data" relates to racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, physical or mental health condition, sexual life, sexual orientation, biometric or genetic information. Under GDPR regulations, criminal convictions or offences are dealt in broadly the same way as a special category.

**Note:** as Dose of Nature is a mental health organisation, data held about service users is likely to include sensitive information about health.

Dose of Nature will only hold sensitive information that enables it to fulfil its obligations, for example:

- Providing its services
- Complying with health & safety legislation
- Not discriminating on grounds of race, disability, sexuality, faith or gender
- Considering reasonable adjustments to the workplace for people with disabilities
- Maintaining records for sickness and maternity pay
- Safeguarding vulnerable service users; both adults and children

The Charity uses the Disclosure and Barring Service (DBS) to check the criminal records of its staff and volunteers. Processing of DBS data is carried out in accordance with legal obligations and safeguarding requirements.

The Charity complies fully with the Disclosure and Barring Service (DBS) Code of Practice regarding the correct handling, use, storage, retention and disposal of Certificates and Disclosure information.

Certificate information is kept securely with access strictly controlled and limited to those who are entitled to see it as part of their duties. If a disclosure is present, Dose of Nature will keep a record of a disclosure on a certificate along with the decision made in relation to the subject and their role.

Disclosure information is always kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. For clarity, this is saved in One Drive with restricted access to the Operations Team and Designated Safeguarding Lead. Dose of Nature is aware that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

## **8. Individual rights**

Dose of Nature will uphold the legal rights under GDPR of people in relation to the processing of their personal data. Any Data Subject requests received by Dose of Nature will be forwarded to the Operations Manager for action.

## **9. Safeguarding**

If a staff member or volunteer is concerned about an adult or child at risk of harm, they should refer to the **Safeguarding Adults** and **Safeguarding Children** Policies to decide what to do.

Where there are concerns about the individual's safety, the Charity will share personal data with law enforcement and other agencies if required by law or by the Charity's Safeguarding policies.

In such circumstances, personal data may be shared without consent or notifying the parties involved where it is reasonable and proportionate to do so; and in accordance with the relevant UK GDPR exemption set out in the Data Protection Act 2018.

## **10. Employee responsibilities**

Personal data should not be shared outside of Dose of Nature's data procedures. Use of data inappropriately would be a disciplinary and possibly a criminal offence.

Personal data must be secured by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Employees are responsible for protecting the personal data held by the Charity and must implement reasonable and appropriate security measures against its unlawful or unauthorised processing and accidental loss of, or damage; employees must exercise particular care to protect special categories of personal data and criminal convictions data from loss and unauthorised access, use or disclosure.

## **11. Documenting activities and breaches**

As a requirement of GDPR, Dose of Nature has documented its processing activities (via this policy) and will maintain a register of data breaches; this includes document processing that is:

- Not occasional or
- Could result in a risk to the rights and freedoms of individuals or
- Involves processing special category data or criminal offence data

## **12. Retention policy**

Dose of Nature will only keep information as long as it is required and thereafter will destroy it securely and confidentially.

Managers are responsible for checking records regularly and carrying out audits, as required.

## **13. Data security and breaches**

Every processor of personal information is responsible for dealing with it in a secure and confidential manner.

A security breach refers to any action that might lead to accidental or unlawful destruction of personal data, loss, alteration, unauthorised disclosure of, or access to, personal data. This could be as the result of accidental or deliberate causes and includes loss by encryption by ransomware.

Breaches that are likely to have a significant impact must be reported to the Information Commissioner within 72 hours, but others that cause little impact or harm may not need to be reported. Decisions will be made on a case-by-case basis. All breaches must be recorded internally, and security improvements considered.

If a breach carries a high risk of adversely affecting individuals' rights and freedoms, the individuals must also be informed as soon as possible. Adverse effects include loss of control over their personal data, loss of rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, loss of confidentiality, or any other significant economic loss or social disadvantage to the person concerned.

Should a breach be discovered this must immediately be reported to the Operations Manager who will assess whether the breach is significant and determine what action to take.

All breaches must be reported to the Operations Manager who is responsible for maintaining the data breach register.

## **14. Privacy Impact Assessments**

Data Protection Impact Assessments (DPIA) must be carried out for certain types of processing that may result in a high risk to individuals' interests. DPIAs are required for services targeted at children and should be considered when processing sensitive information or vulnerable individuals.

The Information Commissioner's Office (ICO) provides tools for assessing risks, which once carried out, should ideally be published. If a high risk is identified that cannot be mitigated, advice should be sought from the ICO.

## **15. Training**

The Charity will provide appropriate training to Trustees, staff and volunteers regarding personal data protection and compliance.

## **16. Responsibilities**

Certain individuals have additional responsibilities under this policy, as set out below:

- the Trustees are responsible for developing and reviewing this policy
- the Chief Executive has overall responsibility for overseeing operation of this policy
- the Operations Manager is responsible for maintaining the data breach register.
- the Management Team are responsible, in line with their specific roles, for making their staff and volunteers aware of this policy and encouraging them to enact it fully

## **17. Further information**

Should anyone wish to ask a question or make a complaint about a data protection matter at Dose of Nature, they should contact the Operations Manager: [info@doseofnature.org.uk](mailto:info@doseofnature.org.uk)

Concerns about how Dose of Nature handles personal data should first be raised with the charity using the processes described in this policy. If you are dissatisfied with the response, you may contact the Information Commissioner's Office. <http://www.ico.org.uk>

## **18. Policy information**

We are committed to reviewing our policy and good practice every two years.

**Policy Approved:** 19/06/2026

**Policy Review:** 19/06/2028

**Responsibility:** Operations Manager and Board of Trustees