

GDPR & Data Protection Policy

Organisation: Youth Works Vintage CIC

Policy Owner: [Director - Leom W Gould

Date of Policy: 20/08/2026

Review Date: 01/05/2027

1. Purpose

Youth Works Vintage CIC is committed to protecting the privacy and personal information of everyone who interacts with our organisation.

This policy explains how we collect, use, store, protect and dispose of personal information and how we comply with applicable UK data protection legislation, including the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

We recognise that people have a right to understand how their personal information is used and to have their information handled responsibly and securely.

2. Scope

This policy applies to personal information relating to:

- Young people participating in our activities.
- Parents, guardians and carers.
- Staff and volunteers.
- Trustees or directors.
- Referrers and partner organisations.
- Funders and professional contacts.
- Website users and people contacting the organisation.
- Suppliers and contractors.
- Any other individuals whose personal information we process.

3. Our Data Protection Principles

Youth Works Vintage CIC will follow the principles of UK data protection law.

Personal information will be:

1. **Processed lawfully, fairly and transparently.**
2. **Collected for specified, explicit and legitimate purposes.**
3. **Limited to information that is necessary and relevant.**
4. **Kept accurate and up to date where necessary.**
5. **Kept only for as long as necessary.**

6. **Processed securely and protected against unauthorised access, loss, destruction or damage.**

We will not collect or retain personal information simply because it may be useful in the future.

4. What Information We May Collect

Depending on the services and activities we provide, we may collect information such as:

- Names and contact details.
- Dates of birth or age.
- Emergency contact details.
- Parent, guardian or carer information.
- Referral information.
- Attendance and participation records.
- Relevant information needed to safely support participation in activities.
- Communication records.
- Website enquiries.
- Photographs or video where appropriate permissions have been obtained.
- Information required for funding, monitoring or reporting purposes.
- Staff, volunteer and contractor information.

We will only collect information that is appropriate and necessary for the purpose for which it is being collected.

5. Special Category Information

Some information, such as health information, may be considered **special category data** under UK GDPR.

Where we need to process this type of information, we will ensure that an appropriate lawful basis and additional condition for processing are identified.

Particular care will be taken when handling information relating to young people's health, wellbeing, disabilities or additional needs.

6. Lawful Basis for Processing

We will identify an appropriate lawful basis before processing personal information.

Depending on the circumstances, this may include:

- Consent.
- Contract.

- Legal obligation.
- Vital interests.
- Public task, where applicable.
- Legitimate interests, where appropriate and where the individual's rights do not override those interests.

Where consent is relied upon, consent will be freely given, specific, informed and unambiguous.

Individuals will be informed of what they are consenting to and will generally be able to withdraw consent.

7. Children's Data

Because Yoth works Vintage CIC works with young people, additional care will be taken when processing children's personal information.

We will:

- Collect only information that is necessary.
- Explain how information is used in an age-appropriate way where appropriate.
- Obtain appropriate permissions and consent where required.
- Keep information secure.
- Limit access to authorised individuals.
- Follow our Safeguarding Policy when information raises a safeguarding concern.

Where information is collected directly from a young person, we will take reasonable steps to ensure that they understand how their information will be used.

8. Data Collection

Personal information may be collected through:

- Registration or enrolment forms.
- Referral forms.
- Website forms.
- Email.
- Telephone conversations.
- In-person discussions.
- Partner or referral organisations.
- Funding applications and monitoring requirements.

Individuals will be provided with appropriate privacy information explaining how their information will be used.

9. Data Sharing

We will not sell personal information.

Personal information will only be shared where there is a legitimate reason to do so and where an appropriate lawful basis exists.

Information may be shared with organisations such as:

- Partner organisations.
- Referrers.
- Funders, where required.
- Professional advisers or service providers.
- Emergency services.
- Relevant authorities where legally required or where necessary to protect someone's safety.

Where appropriate, information-sharing arrangements will be documented and third-party organisations will be expected to handle information securely.

Information may be shared without consent where there is a legal requirement or where sharing is necessary to protect someone from serious harm.

10. Safeguarding and Data Protection

Data protection does not prevent appropriate safeguarding action.

Where there is a safeguarding concern, **[CIC Name]** will follow its Safeguarding Policy and may share relevant information where necessary and lawful to protect a child or vulnerable person.

Only information that is relevant and necessary will be shared wherever reasonably possible.

11. Data Security

We will take reasonable technical and organisational measures to protect personal information.

These may include:

- Password protection.
- Secure email and cloud services.
- Access controls.
- Keeping devices and software appropriately updated.
- Restricting access to information to people who need it.
- Secure storage of paper records.

- Avoiding unnecessary downloading or copying of personal information.
- Secure disposal of confidential documents.
- Appropriate security measures for organisational devices.

Personal information should not be stored on personal devices unless there is a legitimate organisational reason and appropriate security measures are in place.

12. Confidentiality

Anyone working for or on behalf of Youth Works Vintage CIC who has access to personal information is expected to maintain confidentiality.

Personal information must not be disclosed to unauthorised individuals.

Confidentiality requirements continue after an individual's employment, volunteering or involvement with the organisation ends.

13. Data Retention

We will not keep personal information for longer than necessary.

Retention periods will depend on the type of information and the reason it was collected.

At the end of the appropriate retention period, information will be securely deleted, destroyed or anonymised where appropriate.

Where legal, contractual, safeguarding or funding requirements require information to be retained for a specific period, those requirements will be followed.

14. Individual Rights

Under UK data protection law, individuals may have rights including:

- The right to be informed about how their information is used.
- The right to access their personal information.
- The right to have inaccurate information corrected.
- The right to request deletion in certain circumstances.
- The right to restrict processing in certain circumstances.
- The right to object to certain processing.
- Rights relating to automated decision-making and profiling, where applicable.

Requests relating to personal data will be considered and responded to within the applicable legal timescales.

15. Subject Access Requests

An individual may ask to see the personal information that Youth Works Vintage CIC holds about them.

Requests should be made to:

Data Protection Contact: Leom Gould

Email: info@youthworksvintage.com

We will verify the identity of the requester where reasonably necessary and deal with requests in accordance with UK GDPR requirements.

16. Data Breaches

A personal data breach may include:

- Personal information being sent to the wrong person.
- Loss or theft of a device containing personal information.
- Unauthorised access to records.
- Accidental deletion or disclosure of information.
- A cyberattack or other security incident.

Any suspected data breach must be reported to the Director or designated Data Protection Contact as soon as possible.

The organisation will assess the breach and take appropriate steps to contain, investigate and remedy it.

Where legally required, a report will be made to the **Information Commissioner's Office (ICO)** within the applicable timeframe.

Affected individuals will also be informed where required.

17. Data Protection by Design

Where we introduce new systems, services or activities that involve personal information, we will consider data protection from the beginning.

We will consider:

- What information is genuinely required.
- Who needs access.
- How information will be stored.
- How long it needs to be retained.
- What risks are involved.
- Whether additional safeguards are required.

Where processing is likely to result in a high risk to individuals, we will consider whether a **Data Protection Impact Assessment (DPIA)** is appropriate.

18. Third-Party Services

Where we use third-party services to process personal information, such as website providers, cloud storage, email systems, booking systems or other software, we will take reasonable steps to ensure that appropriate data protection and security arrangements are in place.

Where required, appropriate data processing agreements or contractual arrangements will be used.

19. International Data Transfers

Where personal information is transferred outside the UK, Youth Works Vintage CIC will ensure that appropriate safeguards are in place in accordance with applicable data protection law.

20. Photographs and Video

Photographs and video may sometimes be taken during CIC activities for legitimate organisational purposes, including publicity, reporting, fundraising or demonstrating the impact of our work.

Where consent is required, appropriate consent will be obtained before using identifiable images.

Particular care will be taken when photographing or recording children and young people.

Consent will not be assumed simply because someone attends an activity.

21. Website and Online Privacy

Our website may collect personal information when individuals contact us, submit forms or otherwise interact with our online services.

The organisation will provide a separate **Privacy Notice** explaining what information is collected through the website, why it is collected, how it is used, how long it is retained and what rights individuals have.

Where cookies or similar technologies are used, appropriate information and consent mechanisms will be provided where required.

22. Training and Awareness

Staff, volunteers and others who handle personal information will be given appropriate guidance on data protection and confidentiality.

Everyone involved with the organisation is responsible for protecting personal information and reporting concerns promptly.

23. Complaints

Anyone who has concerns about how their personal information has been handled should contact:

Data Protection Contact: Leom W Gould

Email: info@youthworksvintage.com

We will investigate concerns and take appropriate action.

Individuals also have the right to raise a concern with the **Information Commissioner's Office (ICO)** where they believe their personal information has not been handled appropriately.

24. Policy Review

This policy will be reviewed at least annually and sooner where:

- There are significant changes to data protection law.
- The organisation introduces new systems or services.
- There is a significant data breach.
- The organisation's activities change significantly.
- A review identifies that changes are required.

Signed: Leom W Gould

Name: LEOM WAYNE GOULD

Position: Director

Date: 20/08/2026

Next Review Date: 01/05/2026