

Genuine Futures CIC – Data Protection and Privacy Policy

PREVENTION OVER
PUNISHMENT:
BUILDING SAFER FUTURES
TOGETHER

Version: 1.0 Approved by Board: 01 Nov 2025 Next Review: 01 Nov 2026

1. Policy Statement

Genuine Futures CIC is committed to protecting the privacy and security of personal information. We comply fully with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant guidance issued by the Information Commissioner's Office (ICO). This policy explains how we collect, use, store, and share personal data and ensures that individuals' rights are respected at all times.

2. Legislative Framework

This policy is based on the following legislation and guidance: • UK General Data Protection Regulation (UK GDPR) • Data Protection Act 2018 • Freedom of Information Act 2000 (where applicable) • Privacy and Electronic Communications Regulations (PECR) 2003 • Information Commissioner's Office (ICO) guidance

3. Scope and Purpose

This policy applies to all staff, volunteers, trustees, contractors, and service users of Genuine Futures CIC. It covers all personal data collected, processed, or stored by the organisation in any form, including digital, paper-based, audio, and visual records. The purpose is to ensure lawful and transparent handling of personal data.

4. Key Principles of Data Protection

Genuine Futures CIC adheres to the seven principles of data protection as defined in Article 5 of the UK GDPR: 1. Lawfulness, fairness, and transparency – data must be processed lawfully and openly. 2. Purpose limitation – data collected for specific, legitimate purposes only. 3. Data minimisation – only data necessary for those purposes is collected. 4. Accuracy – data must be accurate and kept up to date. 5. Storage limitation – data must not be kept longer than necessary. 6. Integrity and confidentiality – appropriate security must be applied. 7. Accountability – the organisation must demonstrate compliance with these principles.

5. Lawful Bases for Processing Data

Personal data will only be processed where a lawful basis applies under Article 6 of the UK GDPR. These may include: • Consent of the individual. • Performance of a contract. • Compliance with a legal obligation. • Protection of vital interests. • Performance of a task carried out in the public interest. • Legitimate interests pursued by the organisation (balanced with individual rights).

6. Roles and Responsibilities

• Board of Directors: Overall responsibility for data protection compliance. • Data Protection Lead: Ensures the policy is implemented, monitors compliance, and reports any breaches. • Staff and Volunteers: Must understand and follow data protection principles and report any incidents or concerns. • Contractors and Partners: Must provide assurances that they comply with UK GDPR when processing data on behalf of Genuine Futures CIC.

7. Collecting and Using Personal Data

Personal data is collected for specific, legitimate purposes including but not limited to: • Volunteer management and safeguarding. • Service delivery and communication with participants. • Employment and HR administration. • Fundraising and stakeholder engagement. Data will only be used for the purpose for which it was collected unless consent is obtained for another use.

8. Data Storage, Retention, and Security

- Personal data will be stored securely using password protection, encryption, or locked filing systems.
- Access will be limited to authorised personnel.
- Data will be retained only as long as necessary to fulfil the purpose for which it was collected or to meet legal requirements.
- At the end of its retention period, data will be securely deleted, shredded, or anonymised.
- Regular audits will be carried out to ensure compliance with retention schedules.

9. Data Sharing and Third Parties

Genuine Futures CIC will not share personal data with third parties unless: • There is a legal requirement to do so. • It is necessary for legitimate organisational functions (e.g., payroll, safeguarding reporting). • The individual has provided explicit consent. When data is shared, a written agreement will be in place to ensure compliance with UK GDPR standards.

10. Data Breach Management

Any suspected data breach must be reported immediately to the Data Protection Lead. Breaches will be investigated promptly to assess potential risk to individuals' rights and freedoms. Where a breach is likely to result in harm or distress, it will be reported to the ICO within 72 hours and affected individuals will be notified in line with Article 33 of the UK GDPR.

11. Data Subject Rights

Individuals have the following rights under UK GDPR: • To be informed about how their data is used. • To access their personal data. • To rectify inaccurate data. • To request erasure ("the right to be forgotten"). • To restrict processing. • To data portability. • To object to processing. Requests must be made in writing and will be acknowledged within 5 working days and responded to within one calendar month.

12. Training and Awareness

All staff and volunteers will receive induction training on data protection and information security. Refresher training will be provided annually. The Data Protection Lead will ensure awareness materials are updated and accessible to all personnel.

13. Monitoring and Review

This policy will be reviewed annually by the Board or sooner if there are changes to legislation or guidance. The organisation will maintain registration with the Information Commissioner's Office (ICO) and ensure up-to-date compliance. Last reviewed: [Insert Date] Next review due: [Insert Date + 12 months]

14. Linked Policies

- Safeguarding & Child Protection Policy
- Volunteer Policy
- Equality, Diversity & Inclusion Policy
- Confidentiality Policy
- ICT and Communications Policy

Privacy Notice Summary

Genuine Futures CIC collects and uses personal data to support our work with volunteers, service users, and partners. We only collect the information necessary to provide our services and meet legal or contractual obligations. Data is stored securely and retained only for as long as needed. You have the right to request access to your data, ask for corrections, or withdraw consent at any time. To contact us regarding your personal data, please email [insert contact email address]. If you are unhappy with how your data has been handled, you have the right to raise a concern with the Information Commissioner's Office (ICO).

