



## **Data Protection Policy**

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### **Policy Statement**

Play Inclusion Project collects and uses personal information about staff, volunteers, children, young people, parents, carers, and other individuals who come into contact with the organisation. This information must be handled correctly and securely, whether recorded on paper, stored in a computer system, or held in another format. Safeguards are in place to ensure compliance with the General Data Protection Regulation (GDPR) and related legislation.

### **Purpose**

This policy ensures that Play Inclusion Project:

- Complies with data protection law and follows good practice
- Protects the rights of staff, volunteers, service users, and partners
- Is open and transparent about how personal data is stored and processed
- Protects itself from risks such as data breaches

All staff involved in collecting, processing, or disclosing personal data are expected to understand and comply with these responsibilities.

### **What is Personal Information?**

Under GDPR, **personal data** refers to any information relating to an identifiable person. This can include names, identification numbers, location data, or online identifiers. GDPR applies to both automated personal data and manual filing systems where information is structured and accessible.

**Sensitive personal data** (special categories of personal data) includes information about racial or ethnic origin, political or religious beliefs, health, sexual life, trade union membership, genetic data, and biometric data. Play Inclusion Project does not collect such data unless legally required or necessary to comply with regulations.

### **Data Protection Law**

GDPR, which came into effect on 25 May 2018, sets out how organisations must process personal data. It requires that data is:

- Processed lawfully, fairly, and transparently
- Collected for specified, explicit, and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Stored only as long as necessary

## **Data Protection Principles**

Play Inclusion Project will ensure personal data is:

- Processed fairly, lawfully, and transparently
- Collected only for specific, legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Not kept for longer than necessary
- Kept secure and protected by appropriate safeguards

We will also:

- Specify the purposes for which information is used
- Ensure information quality and accuracy
- Respect individuals' rights under GDPR, including the rights to access, correct, erase, restrict, and object to the use of their data
- Take appropriate technical and organisational measures to safeguard data
- Ensure data is not transferred abroad without adequate protection
- Treat all individuals fairly and equitably when handling requests for information

## **Data Collection and Consent**

Under GDPR, consent must be:

- Freely given, specific, informed, and unambiguous
- Requested in clear, plain language
- Evidenced and recorded by the organisation
- Withdrawable at any time

Additional rules apply:

- Pre-ticked boxes, silence, or inactivity cannot be used as consent
- For online services, parental consent is required for children under 13

When collecting data, Play Inclusion Project will ensure that individuals:

- Understand why information is needed and how it will be used
- Are informed of consequences if consent is withheld
- Provide written consent wherever possible
- Give consent freely and without pressure

## **Data Sharing and Disclosure**

Data may be shared with relevant agencies (e.g. local authorities, funding bodies, or partner organisations).

Data may be disclosed without consent where legally required, such as:

- To carry out a legal duty
- To protect vital interests of individual
- Where the information has been made public by the individual
- For legal proceedings or obtaining legal advice
- For monitoring equal opportunities
- To provide confidential services where consent cannot reasonably be obtained

### **Data Storage and Security**

- Personal data will be stored securely and only accessed by authorised staff/volunteers.
- Data will be kept only as long as necessary and disposed of securely.
- Electronic data will be protected with strong passwords, firewalls, and encryption where appropriate.
- Data stored on removable media must be locked away when not in use.
- Paper records must be locked in secure cabinets and placed in the Shred-It receptacle when no longer required.
- Systems will be backed up regularly, and backups tested.
- Old IT equipment will be destroyed securely by Shred-It.

### **Staff Responsibilities**

- Only staff with a work-related need may access personal data.
- Data must not be shared informally. Requests for access should go through the CEO
- Staff must take sensible precautions to keep data secure (e.g. locking screens, using strong passwords).
- Personal data must not be stored on personal devices or shared externally without authorisation.
- Data must be reviewed regularly and deleted if no longer needed.
- Staff unsure about data protection responsibilities must seek guidance from the CEO.

### **Data Accuracy and Access Rights**

Play Inclusion Project will take reasonable steps to keep personal data accurate and up to date.

Individuals have the right to:

- Ask what information is held about them and why
- Request access to their data
- Request corrections or deletions
- Object to how their data is processed
- Withdraw consent at any time
- Make a complaint if they feel data has been mishandled

Staff must ensure that:

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- Data is held in as few locations as necessary
- Out-of-date or inaccurate data is corrected or removed promptly
- Information is reviewed annually for accuracy

### **Policy Compliance**

- All staff handling personal data are responsible for following GDPR best practice.
- Staff will receive training and supervision as appropriate.
- Breaches of this policy may result in disciplinary action.