



## **Data Protection Policy**

### **Clapton Park URC / Round Chapel Old School Rooms**

**Approved by:** BOARD OF TRUSTEES

**Date Adopted:** 13<sup>th</sup> April 2026

**Date of Next Review:** April 2027

**Data Protection Officer:** *Michelle Baker, Centre Manager*

**Trustee with responsibility for Data Protection:** *Tom Price*

### **1. Overview**

Clapton Park URC (CPURC) / Round Chapel Old School Rooms, is committed to processing personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We recognise our responsibility to protect the personal information of staff, volunteers, participants, hirers, donors, and all other individuals whose information we hold.

Personal data means any information relating to an identified or identifiable natural person.

### **2. Purpose and Objectives**

CPURC is fully committed to compliance with all UK data protection legislation. When processing personal data we ensure that it 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**
- **Kept only for as long as necessary**
- **Processed securely**
- **Handled by a controller who can demonstrate compliance**

CPURC will:

- Ensure each processing activity has a clear lawful basis
- Specify and communicate how information will be used
- Only collect information necessary for operational or legal purposes
- Maintain data accuracy
- Retain data only for appropriate time periods
- Uphold data subject rights
- Implement technical and organisational security measures
- Ensure no personal data is transferred outside the UK/EEA without adequate safeguards



### 3. Employees' Personal Information

CPURC processes employee personal data for the duration of employment and afterwards where required. This may include:

- Recruitment records and references
- Employment terms
- Payroll, tax, and NI information
- Performance and appraisal records
- Health and sickness documentation
- Holiday records
- Disciplinary and grievance information
- Training records
- Contact details
- Correspondence and other information provided by the employee

### Special Category Data

In some cases CPURC may hold sensitive personal data including health, ethnicity, or religious beliefs. Such data will only be processed where necessary for:

- Legal obligations
- Personnel management
- Employment suitability
- Equality monitoring

Explicit consent will be obtained where required unless another lawful basis applies.

### 4. Access to Data

Employees may request access to their personal data. CPURC will respond within **one month**, as required by law. Corrections must be made where information is inaccurate.

### 5. Data Security

All employees, trustees, and volunteers must ensure that personal information they hold is:

- Stored securely
- Not disclosed to anyone without proper authorisation

Security requirements:

- Paper records stored in locked cabinets
- Electronic records encrypted or password protected
- Regular backups on secure systems



- Devices containing personal data kept secure while travelling
- Hard copies transported only when essential

Unauthorised disclosure may result in disciplinary action.

## **6. IT and Communications**

CPURC reserves the right to monitor and access all charity-owned digital equipment.

### **Bring Your Own Device (BYOD)**

- Devices paid for by CPURC are charity-owned
- Personal devices used for work must meet security standards

#### **Employees must not:**

- Share passwords
- Access systems without authorisation
- Download software without approval
- Store personal files on charity systems
- Access illegal, harmful, or discriminatory content
- Take photos/videos of individuals without consent
- Send offensive or inappropriate communications

Some devices may contain tracking tools for:

- Theft prevention
- Safety
- Operational verification (e.g., timesheets)

Tampering with tracking technology may result in disciplinary action.

## **7. Social Media**

Employees using personal social media must:

- Not post content that could harm CPURC's reputation
- Not disclose confidential information
- Not engage in discriminatory, harassing or damaging discussions
- Keep accounts secure

CPURC may request removal of posts that breach this policy.



## 8. Notifying Data Breaches

A personal data breach may involve:

- Unauthorised access
- Sending data to an incorrect recipient
- Device loss or theft
- Unauthorised disclosure
- Alteration or destruction of data

## 9. Investigation and Notification of Breaches

If a breach or potential breach occurs:

- It will be investigated by the Director or Chair of Trustees
- Breaches posing a **risk to individuals** will be reported to the ICO within **72 hours**
- High-risk breaches will be reported to affected individuals promptly

## 10. Record of Breaches

CPURC records all personal data breaches, notifiable or not, in line with accountability requirements.

Records include:

- What happened
- Impact
- Remedial actions taken

## 11. Participant and Service User Personal Data

CPURC collects and processes personal information for participants in programmes and activities.

### 11.1 Data collected may include:

- Name
- Date of birth
- Contact details
- Attendance records
- Medical or accessibility information
- Photos or recordings (with consent)
- Demographic information (if required by funders)
- Safeguarding-related information

### 11.2 Lawful bases include:

- Legitimate interests



- Legal obligation (e.g., safeguarding)
- Vital interests
- Consent (e.g., photography or optional monitoring)

### **11.3 Uses of participant data:**

- Managing bookings and attendance
- Communication
- Safeguarding and wellbeing
- Reporting to funders (anonymised where possible)
- Programme monitoring and improvement

### **11.4 Sharing may occur with:**

- Safeguarding authorities
- Emergency services
- Funders (anonymised unless consent allows otherwise)
- Secure third-party processors

### **11.5 Retention (typical):**

- Attendance records: 3–7 years
- Emergency contact details: deleted after involvement ends
- Safeguarding records: 25+ years
- Booking forms: up to 7 years

### **11.6 Rights of participants include:**

- Access
- Correction
- Deletion
- Restriction
- Objection
- Withdrawal of consent

## **12. Building Hirer Personal Data**

CPURC collects and processes personal data from individuals or organisations hiring rooms or the building.

### **12.1 Data collected may include:**

- Name and organisation
- Address and contact details
- Booking and activity details



- Payment and invoice information
- Public liability insurance certificates
- Risk assessments or safeguarding policies
- Incident reports

#### **12.2 Lawful bases include:**

- Contract
- Legal obligation
- Legitimate interests
- Consent (optional uses)

#### **12.3 Uses of hirer data:**

- Administering bookings
- Payment processing
- Communication
- Compliance with safety and legal requirements
- Managing incidents

#### **12.4 Data may be shared with:**

- Insurers
- Emergency services
- Regulatory authorities
- Approved third-party processors

#### **12.5 Retention (typical):**

- Booking agreements: 7 years
- Payment records: 7 years
- Insurance/risk documents: duration of hire + 3 years
- Incident reports: 7–25 years

#### **12.6 Rights of hirers:**

- Access
- Rectification
- Erasure (where possible)
- Restriction
- Objection
- Withdrawal of consent



### 13. Review of Policy

Clapton Park URC / Round Chapel Old School Rooms takes data protection seriously and will review this policy annually or when legislation or operational needs change.

**Date of next review:** *March 2027*

**By:** *Clapton Park URC*

### Sign off & approval

Signed by CPURC Chair of Trustees \_\_\_\_\_ *AMBurns* \_\_\_\_\_

Print Name \_\_\_\_\_ A M Burns \_\_\_\_\_

Date \_\_\_\_\_ 13<sup>th</sup> April 2026 \_\_\_\_\_

Signed by Data Protection Officer \_\_\_\_\_ *[Signature]* \_\_\_\_\_

Print Name \_\_\_\_\_ M Baker \_\_\_\_\_

Date \_\_\_\_\_ 13<sup>th</sup> April 2026 \_\_\_\_\_