



FOREST FAMILIES & SUNFLOWER FAMILIES CIC



Data Protection Policy & GDPR Policy

1. Introduction

Forest Families is committed to safeguarding the personal data of our customers, volunteers, employees, service users, and stakeholders. This policy outlines how we collect, use, store, and protect personal data in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

2. Purpose

The purpose of this policy is to ensure that Forest Families:

- Complies with all applicable data protection laws.
- Protects the rights of individuals whose personal data we process.
- Is transparent in how it collects and uses personal data.
- Safeguards against the risk of data breaches.

3. Scope

This policy applies to:

- All staff, volunteers, contractors, and third parties working with or on behalf of Forest Families.
- All personal data collected, stored, and processed by Forest Families in both electronic and physical formats.

4. Data Protection Principles

Forest Families commits to the following principles in accordance with GDPR:

1. Lawfulness, Fairness, and Transparency

Personal data shall be processed lawfully, fairly, and in a transparent manner.

2. Purpose Limitation

Data will only be collected for specified, explicit, and legitimate purposes. It will not be processed further in a manner incompatible with those purposes.

3. Data Minimization

The data collected will be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

4. Accuracy

Personal data shall be accurate and kept up to date. Inaccurate data will be corrected or erased without delay.

5. Storage Limitation

Data will not be retained for longer than necessary to fulfill the purposes for which it was collected. After this time, it will be securely deleted.

6. Integrity and Confidentiality

Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful access, accidental loss, destruction, or damage.

7. Accountability

Forest Families will be accountable for compliance with these principles and will be able to demonstrate that appropriate measures are in place.

5. Data Collection

We collect personal data from the following groups:

- **Members:** Names, contact information, demographic details, and preferences related to events and services.
- **Service Users:** Contact details, medical information (if relevant), and preferences for services.
- **Employees and Volunteers:** Employment history, contact details, emergency contacts, and payroll information.
- **Third-Party Suppliers:** Contact details and any relevant contractual or service information.

6. Legal Bases for Processing

Forest Families processes personal data under the following lawful bases:

- **Consent:** Where explicit consent has been provided by the individual.
- **Contract:** Where data processing is necessary for the performance of a contract.
- **Legal Obligation:** Where we are required by law to process personal data.
- **Legitimate Interest:** Where processing is necessary for our legitimate interests, balanced against individuals' rights and interests.

7. Rights of Data Subjects

Individuals whose personal data is processed by Forest Families have the following rights:

- **Right to be Informed:** To understand how their data is collected and used.
- **Right of Access:** To request access to their personal data.
- **Right to Rectification:** To have inaccurate data corrected.
- **Right to Erasure (Right to be Forgotten):** To request the deletion of personal data where it is no longer necessary or lawful to retain.
- **Right to Restrict Processing:** To limit how their personal data is used.
- **Right to Data Portability:** To receive their personal data in a commonly used format.
- **Right to Object:** To object to data processing under certain circumstances.
- **Rights in Relation to Automated Decision-Making and Profiling:** To be informed about automated decisions and object if necessary.

8. Data Retention

Forest Families will not retain personal data for longer than necessary. The retention period will be determined based on the following factors:

- Legal requirements.
- The purpose for which the data was collected.
- Any contractual obligations.

Once the data retention period has expired, personal data will be securely deleted or anonymized.

9. Data Security

Forest Families implements appropriate technical and organizational measures to ensure the security of personal data, including:

- Encryption of sensitive data.
- Secure storage of physical documents.
- Access controls and password protection for electronic data.
- Regular security audits and updates.
- Training for staff and volunteers on data protection best practices.

10. Data Sharing

Forest Families may share personal data with third parties under the following conditions:

- When required by law (e.g., reporting to authorities).
- With third-party service providers or partners where necessary to deliver services, subject to confidentiality agreements.
- With consent from the data subject.

Any data shared with third parties will be done so securely, ensuring that the third party complies with relevant data protection laws.

11. Data Breach Procedures

In the event of a data breach:

1. The breach will be reported to the Data Protection Officer (DPO) immediately.
2. The DPO will assess the risk to individuals and, if necessary, notify the relevant supervisory authority within 72 hours.
3. Affected individuals will be informed without undue delay if the breach poses a high risk to their rights and freedoms.
4. Measures will be taken to contain and mitigate the breach, and steps will be taken to prevent future occurrences.

Section 12: Data Relating to Children, Safeguarding & Alternative Provision

Forest Families recognises that it processes personal data relating to children and young people, including those who may be considered vulnerable due to Special Educational Needs and Disabilities (SEND), mental health needs, trauma, or difficulties attending school.

Safeguarding & Child Protection Records

- Safeguarding and Child Protection (CP) records are stored separately from general student files.
- Access to CP records is strictly limited to the Designated Safeguarding Lead (DSL) and authorised senior staff only.
- CP records are securely held in password-protected digital folders or locked physical storage.
- Records are factual, dated, and maintained in chronological order.

Lawful Basis for Processing Safeguarding Data

Personal data relating to safeguarding and welfare is processed under the lawful bases of:

- Legal obligation
- Vital interests of the child
- Public task

Information Sharing

Information relating to safeguarding or welfare concerns may be shared, where appropriate, with:

- The child's home school

- Local Authority services
- Social care or safeguarding agencies

Information is shared on a need-to-know basis, in line with GDPR, safeguarding legislation, and *Working Together to Safeguard Children* guidance.

Retention of Safeguarding Records

Safeguarding records are retained in line with statutory guidance and Local Authority expectations and are securely disposed of when no longer required.

Data Protection Lead

The Director of Forest Families acts as the Data Protection Lead (GDPR Lead) and is responsible for overseeing data protection compliance.

Data Protection Lead: Sian Cain, Director

Date Checked 08/01/2026

Review Date 08/01/27

Sian Cain