

# Confidentiality and Data Protection Policy



This policy helps ensure that Rye Youth Zone handles personal and confidential data with the highest level of care, in compliance with GDPR and the Data Protection Act, and that the privacy of all individuals involved in our services is maintained.

## 1. Introduction

Rye Youth Zone (the "Youth Club") is committed to protecting the privacy, confidentiality, and security of personal data. We are dedicated to complying with all applicable data protection laws, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This policy outlines the principles and practices by which we safeguard the confidentiality and protection of personal data of our members, staff, volunteers, and other individuals with whom we interact.

## 2. Scope

This policy applies to all employees, volunteers, contractors, members, and any third parties who may handle personal data within Rye Youth Zone. It covers the collection, storage, use, sharing, and disposal of personal data, as well as ensuring that confidentiality is maintained across all operations.

## 3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable living person, including but not limited to name, address, phone number, medical history, and photographs.
- **Confidential Information:** Any information shared with the Youth Club that must be kept private, including sensitive personal data, member-related information, staff or volunteer records, or any data that could impact individuals' privacy if disclosed.
- **Processing:** Any action performed on personal data, including collection, storage, use, sharing, or deletion.
- **Data Subject:** An individual whose personal data is collected and processed.
- **Data Controller:** The entity that determines the purposes and means of processing personal data (Rye Youth Zone).
- **Data Processor:** A third party that processes personal data on behalf of the Data Controller.

## 4. Purpose of the Policy

The purpose of this policy is to:

- Ensure that all staff, volunteers, and others involved in the activities of Rye Youth Zone understand their responsibilities with regard to data protection and confidentiality.
- Provide guidelines on how to handle and protect personal and confidential data in compliance with GDPR and the Data Protection Act 2018.
- Safeguard the privacy and confidentiality of individuals participating in our programs and services.

- Ensure compliance with all applicable laws and regulations regarding data protection and confidentiality.

## 5. Principles of Data Protection and Confidentiality

Rye Youth Zone is committed to ensuring that all personal data and confidential information is handled in a way that respects privacy and protects individuals' rights. The following principles apply:

- **Lawfulness, Fairness, and Transparency:** Personal data is collected and processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Personal data is collected for specific, legitimate purposes and not processed in a manner incompatible with those purposes.
- **Data Minimisation:** Only the minimum amount of personal data necessary for the intended purpose will be collected and processed.
- **Accuracy:** Personal data will be kept accurate and up to date, and any inaccuracies will be corrected promptly.
- **Storage Limitation:** Personal data will not be kept for longer than necessary and will be securely deleted when no longer required.
- **Integrity and Confidentiality:** Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage.
- **Accountability:** Rye Youth Zone takes responsibility for complying with data protection principles and is able to demonstrate compliance with this policy.

## 6. Confidentiality and Privacy Obligations

All individuals handling personal or confidential data have a duty to respect the privacy of others. The following confidentiality rules must be followed:

- **Confidentiality of Members:** All personal information regarding youth members, including health details, emergency contacts, and any sensitive information, must be kept strictly confidential.
- **Confidentiality of Staff and Volunteers:** Staff and volunteer records, including personal contact information, employment details, and DBS checks, must remain confidential.
- **Restricted Access:** Personal and confidential data should only be accessed by authorised individuals who require the data to perform their duties. Unauthorised access is prohibited.
- **No Sharing of Information:** Confidential data should not be shared with third parties unless explicitly required for the performance of duties (e.g., in the case of emergency services) or with express consent from the data subject.
- **Discretion with Communication:** When discussing confidential or personal information, employees, volunteers, and contractors must ensure that they are in a private setting and that the discussion cannot be overheard.

## 7. Personal Data We Collect

Rye Youth Zone collects a range of personal data, including but not limited to:

- **Youth Members:** Names, contact details, medical information, emergency contacts, consent forms, photographs, and any other relevant information related to participation in Youth Zone activities.

- **Staff & Volunteers:** Personal contact details, employment or volunteering history, training records, DBS checks, and references.
- **Parents/Guardians:** Names, contact details, emergency contact information, and consent forms.
- **Visitors and Donors (if applicable):** Names, contact details, and any donations or contributions made to the Youth Zone.

## 8. Data Security Measures

We take appropriate security measures to protect personal and confidential data from unauthorised access, alteration, loss, or destruction. These include:

- **Encryption:** Sensitive personal data is encrypted both in transit and at rest where necessary.
- **Access Controls:** Personal data is accessible only to authorised staff, volunteers, or third parties as required for specific roles and tasks.
- **Secure Systems:** We employ secure IT systems with firewalls, antivirus software, and other measures to prevent unauthorised access or cyber-attacks.
- **Data Disposal:** When personal data is no longer needed, it will be securely deleted or destroyed to ensure that it cannot be recovered or misused.

## 9. Data Sharing and Third-Party Disclosure

Personal data may only be shared with third parties in the following circumstances:

- **With Consent:** When consent has been obtained from the individual (e.g., for photographic use or sharing health data for emergencies).
- **To Comply with Legal Obligations:** We may share personal data with statutory authorities or regulatory bodies when required by law (e.g., for safeguarding purposes or in response to a legal request).
- **With Service Providers:** We may share data with third-party service providers that process data on behalf of the Youth Zone, such as IT providers or event management services. These third parties are required to comply with data protection standards.

## 10. Rights of Individuals

Under the GDPR, individuals have specific rights regarding their personal data. These include:

- **Right to Access:** Individuals can request a copy of the personal data we hold about them.
- **Right to Rectification:** Individuals can request corrections to inaccurate or incomplete data.
- **Right to Erasure:** Individuals can request that we delete their personal data under certain conditions.
- **Right to Object:** Individuals can object to the processing of their personal data for certain purposes.

- **Right to Restrict Processing:** Individuals can request the restriction of processing of their personal data in certain situations.
- **Right to Data Portability:** Individuals can request to receive their personal data in a structured, commonly used, and machine-readable format.

Requests to exercise these rights should be submitted in writing to RYZ at [info@theryz.com](mailto:info@theryz.com)

## 11. Breaches and Reporting

Any employee or volunteer who becomes aware of a data breach (e.g., accidental loss, unauthorised access, or disclosure of personal data) must report it immediately to the Directors of Rye Youth Zone using [info@theryz.com](mailto:info@theryz.com). In the event of a breach, we will take steps to mitigate any risks and, if necessary, notify the Information Commissioner's Office (ICO) within 72 hours.

## 12. Training and Awareness

All staff and volunteers will receive training on data protection, confidentiality, and how to handle personal information securely. Regular refresher training will be provided to ensure continued compliance with the policy.

## 13. Policy Review

This Confidentiality and Data Protection Policy will be reviewed annually and updated as necessary to reflect changes in law or the operations of Rye Youth Zone.

Approved by Sophie Thorpe and Caroline Drummond (RYZ Directors)

Date 8<sup>th</sup> of January 2025

Last review: 8<sup>th</sup> of January 2025

Next review: 8<sup>th</sup> of January 2026

## Contacts details

For any questions or concerns related to confidentiality and data protection, staff should contact RYZ directors at [info@theryz.com](mailto:info@theryz.com)

### **Rye Youth Zone CIC**

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