



Data Protection Policy



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Date Updated	17th November '25
Date to be reviewed	16th November '27
Owner	Daniel Stockton

Date	Amendments made	Updated by
17th November '25	Laura Stockton - GDPR & compliance lead. Updated contact details.	DS



Growing Futures Data Protection Policy

1. Introduction

At Growing Futures, we are committed to protecting the privacy and personal data of all individuals who interact with our organisation, including children, parents/carers, staff, and volunteers. This Data Protection Policy sets out our procedures and responsibilities to ensure the proper handling, processing, and security of personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Policy Statement

Safeguarding personal data is essential to maintaining trust and transparency. Growing Futures is committed to ensuring that personal data is:

- Processed lawfully, fairly, and transparently
- Collected and used only for specified, explicit and legitimate purposes
- Kept secure and protected against unauthorised access, loss or misuse

All staff are expected to adhere to this policy and to handle personal data responsibly at all times.

3. Key Principles

Growing Futures adheres to the UK GDPR principles. Personal data shall be:

- **Lawful, fair and transparent:** Processed lawfully, fairly and in a transparent manner.
- **Purpose limitation:** Collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.
- **Data minimisation:** Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy:** Accurate and, where necessary, kept up to date.
- **Storage limitation:** Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which it is processed.
- **Integrity and confidentiality:** Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.



4. Data Collection and Use

4.1 Types of Data Collected

We may collect and process (as appropriate and necessary):

- Contact information (e.g. name, address, phone number, email)
- Demographic information (e.g. date of birth, gender)
- Educational information (e.g. school records, educational needs, EHCP details where relevant)
- Health information (e.g. medical conditions, allergies, relevant health needs)
- Attendance records (e.g. participation in activities, sessions attended, timetables)

4.2 Legal Basis for Processing

We process personal data on one or more of the following legal bases:

- **Consent:** The data subject (or parent/carer where appropriate) has given clear consent for specific purposes.
- **Contract:** Processing is necessary for the performance of a contract or to take steps at the request of the data subject before entering into a contract.
- **Legal obligation:** Processing is necessary to comply with a legal obligation to which Growing Futures is subject.
- **Vital interests:** Processing is necessary to protect someone's vital interests (e.g. in a medical or safeguarding emergency).
- **Legitimate interests:** Processing is necessary for the legitimate interests of Growing Futures or a third party, except where these are overridden by the rights and freedoms of the data subject.

5. Data Security

We are committed to keeping personal data secure and have put in place appropriate technical and organisational measures, which may include:

- Secure storage of physical records (e.g. locked cabinets, restricted access)
- Encryption and secure storage of digital records
- Password protection and user access controls
- Limiting access to personal data to authorised personnel only



- Regular review of security practices and access permissions

6. Data Subject Rights

Individuals whose data we hold (“data subjects”) have the following rights under UK GDPR:

- **Right to be informed:** To be informed about the collection and use of their personal data.
- **Right of access:** To request access to their personal data and information about how it is processed.
- **Right to rectification:** To request correction of inaccurate or incomplete data.
- **Right to erasure (“right to be forgotten”):** To request deletion of their personal data in certain circumstances.
- **Right to restrict processing:** To request restriction of processing in certain situations.
- **Right to data portability:** To obtain and reuse their personal data for their own purposes across different services, where applicable.
- **Right to object:** To object to processing in certain circumstances, including processing based on legitimate interests or direct marketing.

Requests relating to these rights should be made to the Data Protection Officer/Lead (see Section 9).

7. Data Breaches

In the event of a personal data breach, Growing Futures will:

- Promptly assess the nature and seriousness of the breach
- Where required, report the breach to the Information Commissioner’s Office (ICO) within 72 hours of becoming aware of it
- Where the breach is likely to result in a high risk to the rights and freedoms of individuals, inform affected data subjects without undue delay
- Record all breaches and near-misses in a data breach log and review them to improve practice

8. Review and Monitoring

This Data Protection Policy will be reviewed regularly and at least within the organisation’s policy review cycle, or sooner if there are significant changes in data protection law, guidance, or our



practices. Any necessary updates will be made to maintain compliance and strengthen our approach to data protection.

9. Contact Information

For any questions, concerns, or requests regarding this Data Protection Policy or the way Growing Futures processes personal data, please contact:

Data Protection Lead (GDPR):

Name: Laura Stockton

Role: Data Protection Lead

Email: laura@growingfuturescornwall.com

Alternative Contact:

Name: Daniel Stockton

Role: Founding Director, Growing Futures Cornwall

Phone: 07488 268935

Email: dan@growingfuturescornwall.com