

Data Protection Policy



Centre Name	Creating Effective Generations (CEG)
Approved/Reviewed by	Charlie Aston
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1. Introduction

Creating Effective Generations (CEG) collects and processes personal data to deliver mentoring, support services, and safeguarding interventions for children, young people, and families.

This policy sets out how personal data is collected, handled, stored, and shared in line with legal requirements and best practice.

2. Legal Framework

CEG complies with:

- UK GDPR
- Data Protection Act 2018
- Safeguarding legislation including *Working Together to Safeguard Children*

3. Data Protection Principles

Personal data must be:

1. Processed lawfully, fairly and transparently
2. Collected for specific and legitimate purposes
3. Adequate, relevant and limited
4. Accurate and up to date
5. Retained only as long as necessary
6. Kept secure
7. Processed with accountability

4. Scope of Policy

This policy applies to:

- All CEG staff and volunteers
- Contractors and partner organisations
- All personal data held in any format

5. Types of Data Collected

CEG may collect and process:

General Personal Data

- Names, addresses, contact details
- Dates of birth
- Family and household information
- School or agency involvement

Special Category Data

- Safeguarding concerns
- Health and wellbeing information
- Risk assessments
- Disclosures made during mentoring sessions

Operational Data

- Session reports and case notes
- Referral information
- Communication records with professionals

6. Lawful Basis for Processing

CEG processes data under:

- **Article 6(1)(e)** – Public task (safeguarding and welfare)
- **Article 6(1)(f)** – Legitimate interests (service delivery)
- **Article 9(2)(g)** – Safeguarding children and individuals at risk
- **Article 9(2)(h)** – Health and social care purposes

Where safeguarding concerns exist, **consent is not the legal basis for processing or sharing information.**

7. Safeguarding and Information Sharing

7.1 Principle

The welfare of the child is paramount. Data protection law **does not prevent appropriate information sharing for safeguarding purposes.**

7.2 Sharing Without Consent

CEG may share information without consent where:

- A child is at risk of harm
- A disclosure of abuse (including historical abuse) is made
- A safeguarding concern requires escalation
- It is necessary to prevent or detect crime

Information may be shared with:

- Social Care
- Police
- Health professionals
- Other safeguarding partners

7.3 Sharing with Parents

Information is not always shared with parents immediately. This includes where:

- It may place the child at increased risk
- It could interfere with a safeguarding investigation
- The child has disclosed sensitive information in confidence

Decisions are made on a case-by-case basis, guided by safeguarding professionals.

8. Roles and Responsibilities

All staff and volunteers are responsible for:

- Following this policy
- Protecting personal data
- Reporting concerns appropriately

Data Protection Responsibility

Due to the size of the organisation, CEG is not required to appoint a formal Data Protection Officer (DPO).

However, CEG recognises its responsibilities under UK GDPR and assigns **overall accountability for data protection compliance to senior management**.

A designated member of staff will oversee:

- Data protection compliance
- Safeguarding-related information sharing decisions
- Data breach management
- Staff guidance and training

Where necessary, CEG will seek external advice to ensure compliance with legal and safeguarding requirements.

9. Staff Guidelines

Staff must:

- Only access data necessary for their role
- Not share data informally
- Keep information secure at all times
- Use strong passwords and secure systems
- Record information accurately and objectively
- Seek guidance when unsure

10. Data Storage and Security

Paper Records

- Stored in locked cabinets
- Not left unattended
- Shredded when no longer needed

Electronic Records

- Stored on secure systems
- Password protected and encrypted where appropriate
- Access restricted to authorised personnel

- Regularly backed up

Data must not be stored on personal devices unless authorised and secure.

11. Data Use

When using personal data:

- Access only what is necessary
- Do not share via unsecured methods
- Ensure screens are locked when unattended
- Use secure systems for communication

12. Data Accuracy

CEG will:

- Keep records up to date
- Correct inaccuracies promptly
- Avoid duplication of records
- Regularly review data

13. Data Retention

Data will be retained only as long as necessary.

Safeguarding records may be retained longer in line with legal and best practice guidance, particularly where there is risk history.

14. Subject Access Requests (SARs)

Individuals have the right to access their data.

However, CEG may restrict access where:

- It may put a child at risk
- It could impact a safeguarding investigation
- It includes third-party information

Requests will be handled in line with UK GDPR.

15. Data Sharing and Disclosure

CEG will only share data when:

- There is a lawful basis
- It is necessary and proportionate
- It is relevant to the purpose

All sharing decisions must be recorded, including:

- What was shared
- With whom
- The reason for sharing

16. Providing Information (Privacy Notice)

CEG provides individuals with a privacy notice explaining:

- What data is collected
- How it is used
- When it may be shared
- Their rights

This includes clear information that:

Data may be shared without consent for safeguarding purposes

Session information may be shared with professionals but not routinely with parents

17. Complaints

Concerns about data handling should be raised with CEG in the first instance.

01614259625

info@cegprogramme.com

Individuals can also contact the
Information Commissioner's Office (ICO) if they remain dissatisfied.