



GDPR and RECORD KEEPING

GDPR and Record Keeping Policy

Last Updated: May 2026 Review date: May 2028

1. PURPOSE OF THIS POLICY

This policy explains how Sweet Science Foundation collects, stores, uses, shares, retains, and disposes of personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, safeguarding responsibilities, and charity governance requirements.

Sweet Science Foundation is committed to:

- Protecting the privacy and rights of children, young people, parents/carers, staff, volunteers, trustees, and partners.
- Ensuring personal information is processed lawfully, fairly, and transparently.
- Maintaining accurate and secure records.
- Supporting safeguarding and welfare responsibilities.
- Ensuring all records are retained appropriately and destroyed securely.

Sweet Science Foundation will ensure that all personal data that it holds will be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- d) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- e) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- f) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- g) personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public

interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the UK-GDPR in order to safeguard the rights and freedoms of individuals; and

- h) 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, using appropriate technical or organisational measures.

This policy applies to:

- Trustees
- Employees
- Volunteers
- Sessional workers
- Contractors
- Partner organisations handling data on behalf of the charity

2. SCOPE

This policy covers all records held by Sweet Science Foundation, including:

- Participant records
- Consent forms
- Safeguarding records
- Mentoring notes
- Attendance registers
- Incident and accident reports
- Staff and volunteer records
- Recruitment documents
- Trustee records
- Financial records
- Monitoring and evaluation data
- Digital communications
- CCTV or photographic records (where applicable)

The policy applies to both electronic records and paper-based records

3. LEGAL AND REGULATORY FRAMEWORK

This policy is based on:

UK GDPR

Data Protection Act 2018

Children Act 1989 and 2004

Working Together to Safeguard Children

Charity Commission guidance

HMRC record retention requirements

Safeguarding obligations for organisations working with children and young people

4. DATA PROTECTION PRINCIPLES

Sweet Science Foundation will ensure personal data 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.
- Retained only as long as necessary.
- Processed securely and confidentially.
- Managed in a way that demonstrates accountability.

5. LAWFUL BASES FOR PROCESSING

Sweet Science Foundation will obtain, hold and process all personal data in accordance with the UK-GDPR for the following lawful purposes. In all cases the information collected, held and processed will include Contact Information

The charity may process personal data under the following lawful bases:

a) Consent

Used for:

Photography and media permissions

Marketing communications

Optional surveys and testimonials

Consent must be:

Freely given

Specific

Informed

Unambiguous

Withdrawable at any time

b) Legitimate Interests

Used for:

Running mentoring and boxing programmes

Maintaining attendance records

Communicating with participants and families

Programme evaluation and reporting

The charity will ensure legitimate interests do not override the rights of children and families.

c) Legal Obligation

Used for:

Safeguarding referrals

Health and safety compliance

Employment obligations

Financial and charity reporting

d) Vital Interests

Used where processing is necessary to protect someone's life or wellbeing, including emergency safeguarding situations.

6. SPECIAL CATEGORY DATA

Sweet Science Foundation may process special category data including:

- Health information
- Ethnicity data
- Disability information
- Behavioural or safeguarding concerns

This information will only be processed where necessary and lawful, including for:

- Safeguarding children
- Ensuring safe participation
- Equality monitoring
- Providing appropriate support

Access to special category data will be restricted to authorised personnel only.

7. DATA COLLECTED

Sweet science Foundation collects a variety of personal data commensurate with the variety of purposes for which the data are required in the pursuit of its charitable objects.

All personal data will be collected, held and processed in accordance with the relevant Data Privacy Notice provided to data subjects as part of the process of collecting the data.

A Data Privacy Notice will be provided, or otherwise made accessible, to all persons on whom Sweet Science Foundation collects, holds and processes data covered by the UK-GDPR. The Data Privacy Notice provided to data subjects will detail the nature of the data being collected, the purpose(s) for which the data are being collected and the subjects rights in relation to the use of the data and other relevant information in compliance with the prevailing UK-GDPR requirements.

The charity may collect the following information:

- Participants and Families
- Name
- Date of birth
- Address
- Emergency contacts
- School information
- Attendance records
- Medical information
- Risk assessments
- Mentoring notes
- Safeguarding concerns
- Progress reports
- Staff and Volunteers
- Contact details
- DBS information
- Employment history
- References
- Payroll information
- Training records
- Disciplinary records
- Trustees
- Governance records

- Contact information
- Declarations of interest

8. SAFEGUARDING RECORDS

Safeguarding records are highly confidential and must be handled carefully.

Requirements

Records must be factual, accurate, dated, and signed.

Opinions must be clearly identified as opinion.

Safeguarding files must be stored separately from general participant records where possible.

Access is limited to safeguarding leads and authorised personnel.

Information will only be shared on a need-to-know basis.

Retention

Safeguarding records should normally be retained until the participant reaches age 25, or longer where required by law, insurance, or ongoing safeguarding concerns.

9. RECORD KEEPING STANDARDS

All records must:

- Be clear, accurate, and professional.
- Be written objectively.
- Include dates and names of the person making the record.
- Avoid discriminatory or inappropriate language.
- Be updated promptly.

Staff and volunteers must never:

- Alter records improperly
- Remove information without authorisation
- Share confidential information inappropriately
- Keep unofficial personal files about participants
- 10. Storage and Security
- Electronic Records

Electronic records must be:

- Password protected
- Stored on secure systems
- Backed up appropriately
- Access restricted according to role

Where cloud storage is used, the organisation will ensure providers comply with UK GDPR standards.

Paper Records

Paper files must be:

- Stored in locked cabinets
- Kept in secure offices
- Accessible only to authorised personnel
- Confidential information must not be left unattended.

Mobile Devices

Personal data accessed on phones, tablets, or laptops must be protected by:

- Passwords/PINs
- Encryption where possible
- Secure Wi-Fi usage

Lost or stolen devices containing charity data must be reported immediately.

11. DATA SHARING

Personal information may only be shared where:

- Consent has been obtained; or
- There is a safeguarding concern; or
- There is a legal obligation; or
- Sharing is necessary to protect a child or vulnerable person.

Data may be shared with:

- Schools
- Local authorities
- Social care
- Police
- Healthcare professionals
- Funding bodies (anonymised where possible)

Only relevant and necessary information will be shared.

12. PHOTOGRAPHY, VIDEO AND MEDIA

(also covered within the Sweet Science Foundation Safeguarding Children and Young People Policy, Appendix 1)

The charity may use photographs or videos for:

- Promotion
- Social media
- Funding reports
- Website content

Written consent must be obtained from parents/carers for children and young people under 18 before identifiable images are used.

The charity will never:

- Use full names alongside images without explicit permission
- Use inappropriate or exploitative images
- Share images that place children at risk

13. CONFIDENTIALITY

All staff, volunteers, and trustees must maintain confidentiality.

Confidential information must not be:

- Discussed publicly
- Shared through personal messaging apps unless authorised
- Disclosed to unauthorised individuals

Confidentiality may be breached where safeguarding or legal obligations require disclosure.

14. DATA SUBJECT RIGHTS

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate information
- Request deletion where appropriate
- Restrict processing
- Object to processing
- Withdraw consent
- Lodge complaints with the Information Commissioner's Office (ICO)

Requests should be responded to within one calendar month.

15. DATA BREACHES

In the event of any data breach coming to the attention of the Data Controller the Trustees will immediately notify the Information Commission's Office.

In the event that full details of the nature and consequences of the data breach are not immediately accessible (eg: because Data Processors do not work on every normal weekday) the Trustees will bring that to the attention of the Information Commissioner's Office and undertake to forward the relevant information as soon as it becomes available.

A personal data breach includes:

- Loss of records
- Unauthorised access
- Incorrect disclosure
- Cybersecurity incidents

All breaches must be reported immediately to the Data Protection Lead.

The charity will:

- Investigate breaches promptly
- Assess risks
- Notify the ICO where legally required
- Inform affected individuals where necessary

A breach log will be maintained.

16. RECORD RETENTION SCHEDULE

Participant registration forms	7 years after last contact
Attendance records	7 years
Accident/incident reports	7 years or until age 25 for minors

Safeguarding records	Until age 25 minimum
Staff personnel files	6 years after employment ends
DBS information	6 months (certificate details may be retained longer)
Trustee records	6 years after leaving
Financial records	6 years minimum
Insurance documentation	As required by insurer
Consent forms	Duration of involvement + 3 years
CCTV footage	Normally 30 days unless required for investigation

Retention periods may be extended where legal proceedings, safeguarding concerns, or insurance matters apply.

Personal data shall not be retained for longer than:

a) In the case of data held by subject consent:

the period for which the subject consented to the Charity holding their data;

b) in the case of data held by legitimate interest of the charity:

the period for which that legitimate interest applies. For example: in the case of data subjects who held a role, such as a volunteer, with the Charity the retention period is that for which Sweet Science Foundation reasonably has a legitimate interest in being able to identify that individual's role in the event of any retrospective query about it;

c) in the case of data held by legal obligation:

the period for which Sweet Science Foundation is legally obliged to retain those data.

Sweet science Foundation shall regularly – not less than every 6 months – review the personal data which it holds and remove any data where retention is no longer justified. Such removal shall be made as soon as is reasonably

practical, and in any case no longer than 20 working days (of the relevant Data Processor) after retention of the data was identified as no longer justified.

17. SECURE DISPOSAL OF RECORDS

When records are no longer required they must be securely destroyed.

Paper Records

Cross-cut shredding

Confidential waste disposal service

Electronic Records

Permanent deletion

Secure wiping of devices

Removal from backups where practical

Records must not be disposed of in general waste.

18. STAFF AND VOLUNTEERS RESPONSIBILITIES

All personnel must:

- Read and follow this policy
- Attend GDPR and safeguarding training
- Maintain confidentiality
- Report concerns or breaches immediately
- Only access information needed for their role
- Failure to comply may result in disciplinary action.

19. TRAINING

Sweet Science Foundation will provide regular training on:

- GDPR
- Confidentiality
- Safeguarding
- Secure handling of records
- Cybersecurity awareness

Training records will be maintained.

20. MONITORING AND REVIEW

This policy will be reviewed:

- Every 2 years
- Following significant legal changes
- After serious incidents or data breaches

The Board of Trustees is responsible for ensuring compliance and oversight.

21. CONTACT DETAILS

For questions regarding this policy or data protection matters, contact:

Data Protection Lead – Julie Callaghan

Sweet Science Foundation

25 Danemead Grove, Northolt, UB5 4NX

julie@sweetsciencefoundation.org.uk

Review

This policy will be reviewed every 2 years

Signed:

A handwritten signature in black ink, appearing to read "H. Quess", enclosed within a light gray rectangular box.

Date: 01/05/2026