



The **Daffodil** Project CIC

Data Protection & GDPR Policy

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1. Policy Statement

The Daffodil Project CIC is committed to protecting the **privacy and personal data** of all individuals involved in our work, including children, families, staff, volunteers, supporters, and partners. We aim to ensure all data is collected, stored, processed, and shared **lawfully, transparently, and securely** in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

2. Scope

This policy applies to:

- All staff, directors, and volunteers who have access to personal or sensitive data
 - All data we collect in relation to children, parents/carers, volunteers, staff, partners, and donors
 - Any processing of personal data undertaken by the organisation
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3. Legal Framework

This policy complies with the following legislation and guidance:

- **UK GDPR (UK General Data Protection Regulation)**
 - **Data Protection Act 2018**
 - **Freedom of Information Act 2000**
 - **Children Act 1989 & 2004** (for child data and safeguarding responsibilities)
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4. Data We Collect

We may collect and process the following types of personal data:

- Names, contact details, and emergency contacts
 - Health or medical information (for safeguarding purposes)
 - DBS information (for volunteers and staff)
 - Photographs and video (with consent)
 - Attendance records
 - Behavioural and safeguarding records (e.g. via CPOMS)
 - Financial information (e.g. for donations or expense reimbursements)
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5. Lawful Basis for Processing

Our processing of data is based on one or more of the following legal bases:

- **Consent** (e.g. media use, communications)
- **Contractual obligation** (e.g. agreements with staff or partners)
- **Legal obligation** (e.g. safeguarding, health & safety compliance)
- **Vital interests** (e.g. emergency contact in medical situations)
- **Legitimate interest** (e.g. project development and impact tracking)

6. How We Use and Store Data

- All personal data is **stored securely** in password-protected systems or locked cabinets
- Electronic data is stored on secure cloud-based systems
- Paper files are stored in locked drawers/cabinets
- Data is retained **only as long as necessary**, in line with our retention schedule
- CPOMS is used to securely record safeguarding and behaviour incidents

6.1 Surveillance and CCTV

The Daffodil Project CIC operates on premises where closed-circuit television (CCTV) is in use. The CCTV system is **owned and managed by Miers Court Primary School**, who act as the **data controller** for any images captured. The Daffodil Project CIC does not operate, control, or store CCTV recordings, and does not have routine access to footage.

Where footage is required for safeguarding or security purposes, requests will be made formally to Miers Court Primary School in line with their policies and procedures. Parents, carers, staff, or visitors wishing to exercise their data subject rights in relation to CCTV footage should direct their request to Miers Court Primary School as the responsible data controller.

Summary:

- CCTV on site is managed and controlled by **Miers Court Primary School**.
- The Daffodil Project CIC is not the data controller for CCTV images.
- Access to footage is via formal request to the school.
- Data subject rights (access, erasure, etc.) must be exercised through the school.

7. Data Sharing and Third Parties

We will only share personal data when:

- We are legally required to (e.g. in a safeguarding case)
- It is necessary for delivering services (e.g. liaising with a school)
- Consent has been given (e.g. for marketing or funding use)
- All third-party providers we use (e.g. software, payroll) are GDPR compliant

8. Data Subject Rights

Individuals have the right to:

- **Access their personal data**
- **Rectify inaccurate data**
- **Request erasure of data** (in certain circumstances)
- **Object to or restrict processing**
- **Withdraw consent** at any time
- **Request data portability**

Requests should be sent to:

 office@thedaffodilproject.co.uk

9. Confidentiality

- All staff and volunteers must sign a **confidentiality agreement**
 - Sensitive data (e.g. health, safeguarding, SEND records) is handled with extra care
 - Data is not shared outside the organisation without appropriate permissions
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10. Breach Management

- Any suspected data breach must be reported **immediately to the Director**
 - Serious breaches will be reported to the **ICO (Information Commissioner's Office)** within 72 hours
 - An incident log will be maintained
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11. Staff and Volunteer Responsibilities

All personnel must:

- Complete basic **data protection training**
 - Understand the importance of **data minimisation** and **accuracy**
 - Never leave personal data unattended or unsecured
 - Always lock screens when away from devices
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12. Monitoring & Review

- This policy is reviewed **annually** or sooner in line with changes in legislation
 - All staff and volunteers will be required to re-read and confirm compliance annually
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Signed:

Magdalena Van De Voort



Director, The Daffodil Project CIC

Date: January 2025