Thread CIC – GDPR and Data Protection Policy

📍 Thread CIC, Nidderdale, North Yorkshire

Version: 1.0
Effective Date: 1/9/2025
Review Date: 1/9/2026
Approved by: Kerry Thorpe, Founder & Director

1. Policy Statement

Thread CIC is committed to protecting the rights and privacy of all individuals associated with our organisation, including students, parents/carers, staff, volunteers, and community partners. We collect, process, and store personal data responsibly and in line with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and other relevant legislation.

We recognise that we handle sensitive information – particularly relating to children, health, and safeguarding – and take our duty of care seriously.

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2. Scope

This policy applies to:

- All staff, volunteers, and directors at Thread CIC.
- All personal data processed by Thread CIC, including digital records, paper files, and photographs.
- All activities involving the collection, storage, sharing, or disposal of personal data.

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3. Key Principles

Thread CIC is committed to processing data in accordance with the following principles:

1. **Lawfulness, fairness, and transparency** – data will only be collected and used for specific, legitimate purposes and with clear communication.
2. **Purpose limitation** – data will only be used for the purpose for which it was collected.
3. **Data minimisation** – only the data that is necessary will be collected.
4. **Accuracy** – data will be kept accurate and up to date.
5. **Storage limitation** – data will not be kept longer than necessary.
6. **Integrity and confidentiality** – data will be kept safe and secure at all times.

7. **Accountability** – Thread CIC will take responsibility for and demonstrate compliance with GDPR principles.

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4. Types of Data Collected

Thread CIC may collect and process the following types of data:

- **Student/participant data** – names, contact details, medical needs, SEN/SEND information, safeguarding records, photographs (with consent), attendance.
- **Student Artwork-** Where children's artwork includes their own image (e.g. self-portraits, photography, or mixed media pieces), Thread CIC will only store, display, or share this work with prior written consent from a parent or carer. Images will be stored securely and used only for the purposes agreed in the consent form.
- **Parent/carer data** – names, contact details, emergency contact details, consent forms.
- **Staff/volunteer data** – personal details, DBS information, training records, emergency contacts, references.
- **Operational data** – workshop bookings, evaluation forms, attendance registers, funding and partnership agreements.

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6. How is Data used

- To communicate about workshops and programmes.
- For funding applications/impact reporting (anonymised where possible).
- To comply with legal and regulatory requirements.
- For safeguarding and welfare

7. Legal Basis for Processing Data

Thread CIC processes personal data under the following lawful bases:

- **Consent** – when permission is explicitly given (e.g. for photos, newsletters).
- **Contract** – to deliver services or workshops booked.
- **Legal obligation** – to comply with safeguarding, HMRC, or regulatory requirements.
- **Vital interests** – to protect someone's life in an emergency (e.g. medical records).
- **Legitimate interests** – where processing is necessary for organisational purposes, provided it does not override individual rights.

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8. Data Security

- Paper records will be kept in locked storage.
- Digital data will be stored on password-protected systems with limited access.

- Sensitive data (e.g. safeguarding, health) will only be shared with authorised staff on a need-to-know basis.
- Staff and volunteers must not store personal data on personal devices unless authorised and encrypted.
- Data breaches will be reported immediately to the Data Protection Officer (DPO) and to the ICO if necessary.

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9. Data Retention

Thread CIC will retain personal data only for as long as necessary:

- Student and parent/carer records – up to **6 years after leaving Thread** (or in line with safeguarding requirements).
- Volunteer and staff records – up to **6 years after leaving**.
- Financial/tax records – retained for **6 years** as required by HMRC.
- Safeguarding records – retained in line with statutory guidance (currently until the subject reaches the age of 25).
  Data will be securely destroyed when no longer needed.

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10. Data Sharing

Thread CIC will only share personal data when:

- Required by law or safeguarding duty.
- With consent (e.g. sharing photos on social media/website).
- With trusted third-party providers (e.g. booking platforms, funding partners), under strict data processing agreements.

We will never sell personal data to third parties.

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11. Rights of Individuals

Under GDPR, all individuals have the following rights:

- Right to be informed about how their data is used.
- Right of access to their data.
- Right to rectification of inaccurate data.
- Right to erasure (“right to be forgotten”) where applicable.
- Right to restrict or object to processing.
- Right to data portability.

- Right to complain to the **Information Commissioner's Office (ICO)** if they believe their rights have been breached.

Requests will be dealt with promptly and within **one calendar month**.

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12. Roles and Responsibilities

- **Directors** – ensure overall compliance with GDPR.
- **Data Protection Officer (DPO)** – Kerry Thorpe is responsible for monitoring compliance, handling subject access requests, and reporting breaches.
- **Staff and Volunteers** – must follow this policy and complete data protection training.

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13. Monitoring and Review

- This policy will be reviewed annually or sooner if legislation changes.
- Regular audits of data handling will be carried out to ensure compliance.

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14. Related Policies

- Safeguarding & Child Protection Policy
- Health & Safety Policy
- Complaints Procedure
- Social Media Policy
- Parent consent forms

Approved by: K Thorpe **Signed:** *Kerry Thorpe*
Date: 2/9/25

For further guidance or to raise a concern, contact:

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