



Staff Handbook

GDPR/Data Protection Policy

GDPR/DATA PROTECTION POLICY

In order to make it easier for all staff to keep themselves informed of Bowerbirdy's policies and any changes made to them, we will highlight any changes made from one update to the other.

New text will be highlighted as follows: **This is new text xxx xxx xxx.**

Any old text that has been deleted will be highlighted as follows: **This is old text that has been deleted yyy yy yyyyyy.**

We hope this will help you to quickly be able to identify any changes made to our policies.

Our GDPR/Data Protection Policy

This policy applies to all staff, including senior managers, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of Bowerbirdy.

Introduction

1. Bowerbirdy is a for-profit organisation run by:-
Mr John-Paul White; Bowerbirdy Ltd (Company reg.10132196).
2. Bowerbirdy is based at:-
The Incuba
1Brewers Hill Road
Dunstable
LU6 1AA
3. Bowerbirdy is managed by a management team (the Team), which includes a Data Protection Lead (DPL) with overall responsibility for data compliance.
4. The Team has adopted this GDPR/Data Protection Policy and expects every adult working or helping at Bowerbirdy to support and comply with it.

Purpose of the Policy

1. This policy is intended to ensure that personal data collected, stored and processed by Bowerbirdy is handled in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
2. This policy explains our responsibilities as a data controller, outlines the rights of individuals (including children and their parents/carers), and sets out the procedures for collecting, storing, sharing and protecting data.

Scope

This policy covers all personal data held or processed by Bowerbirdy, including:

- Names, addresses, contact details and health information of children and parents/carers
- Staff and volunteer records
- Incident logs and safeguarding records
- Registration and attendance forms
- Email correspondence, feedback forms, and photos
- Any other personal or sensitive data collected for the purpose of delivering our services

Principles

Bowerbirdy complies with the data protection principles set out in the GDPR. Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and, where necessary, kept up to date

5. Kept in a form which permits identification of data subjects for no longer than is necessary
6. Processed in a manner that ensures appropriate security of the personal data

Children's Data

1. Bowerbirdy recognises that children's data requires additional protections. We only collect information that is necessary for the delivery of our services, such as emergency contact details, medical information, and consent forms.
2. Data is collected with the consent of a parent or legal guardian and stored securely. It is only shared with staff or emergency services where strictly necessary.
3. No data is ever sold or shared with third parties for marketing or commercial purposes.

Lawful Bases for Processing

Bowerbirdy processes data under the following lawful bases:

- Consent: e.g. photo consent, email communications
- Contractual obligation: for staff, freelancers, and certain parents
- Legal obligation: e.g. safeguarding, tax and employment law
- Vital interests: e.g. medical emergencies
- Legitimate interest: e.g. collecting feedback to improve services

Subject Access Requests

1. Individuals (or their parents/carers if under 13) have the right to request access to the personal data we hold about them.
2. Requests should be made in writing to the Data Protection Lead. We will respond within 30 calendar days.

Data Retention

Bowerbirdy keeps personal data only for as long as is necessary. The retention periods are as follows:

- Child registration and attendance records: 3 years
- Safeguarding records: 6 years (or until the child turns 25)
- Staff/volunteer records: 6 years after leaving
- Financial records: 6 years

Data Security

1. All data is stored securely, whether electronically or in hard copy.
2. Staff are trained in data handling, and access is limited based on role and necessity.
3. All devices are password protected and encrypted where appropriate.
4. Any data breaches will be reported in line with ICO guidelines.

Photography and Media

1. We obtain consent from parents/carers before taking or using photos of children.
2. Consent can be withdrawn at any time by contacting the Data Protection Lead.
3. Photos may be used for promotional purposes on our website, social media, and printed materials.

Sharing Data

1. Bowerbirdy does not share personal data with third parties unless there is a clear legal or safeguarding requirement.
2. Where services are delivered in partnership (e.g. with local councils), only the minimal necessary data is shared under formal agreements.

Breach Reporting

Any breach of this policy, or actual or suspected data breach, must be reported immediately to the Data Protection Lead. We will assess the breach, notify the ICO where required, and inform individuals if their data rights have been affected.

Other Related Policies

This policy should be read in conjunction with:

- Safeguarding Children Policy
- At Work Policy
- E-Safety Policy
- Complaints Procedure
- Whistleblowing Policy
- Staff Support and Supervision
- Induction and Training Policy



Legal Framework

This policy complies with:

- Data Protection Act 2018
- UK GDPR
- Human Rights Act 1998
- Children Act 2004
- Working Together to Safeguard Children (2018)

Contact Details

Data Protection Lead (DPL)

Name: John-Paul White

Phone/email: 07931 425625 / john-paul@bowerbirdy.co.uk

Deputy DPL

Name: John Dixon-Bruce

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NOTE: This Policy was approved by the following officer on 01/01/2026 and is due for review every 1 year:
John-Paul White

