



Data Protection Policy

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Definitions

Charity	Means [URBOND], a registered charity.
GDPR	Means the General Data Protection Regulation
Responsible Person	Means [Ousmane Drame]
Register of Systems	Means a register of all systems or contexts in which personal data is processed by the Charity.

Document description:

This document explains how URBOND process personal data.

Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals.
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or



- historical research purposes or statistical purposes shall not be incompatible with the initial purposes.
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - 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.
 - 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; 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 GDPR in order to safeguard the rights and freedoms of individuals; and
 - 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.”

General provisions

- This policy applies to all personal data processed by the Charity.
- The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Charity shall register with the Information Commissioner’s Office as an organisation that processes personal data.

Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- The Register of Systems shall be reviewed at least annually.



- Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

Lawful purposes

- All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information: [A guide to lawful basis | ICO](#)).
- The Charity shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

Data minimisation

- The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy

- The Charity shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

Archiving / removal

- To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.



- The archiving policy shall consider what data should/must be retained, for how long, and why.

Security

- The Charity shall ensure that personal data is stored securely using modern software that is kept up to date.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When personal data is deleted, this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website: [UK GDPR data breach reporting \(DPA 2018\) | ICO](#)).

Reason of collecting personal information:

We use personal data for the following purposes:

- to enable access and engagement in URBOND services,
- to monitor and report on engagement and progress,
- to provide appropriate support,
- to assess the quality of our services,
- to keep children and young people safe,
- to meet any legal and contractual obligations placed upon us for data collection.



Information collected:

- Personal identifiers and contacts (such as name, date of birth, contact details and address)
- Emergency contact details – names, addresses and phone numbers of two contacts (indicated by parents/carers)
- Characteristics (such as ethnicity and language)
- Safeguarding and child protection information (such as court orders and professional involvement, incident and safeguarding reports and plans)
- Education, training and employment status (including any special support needs)
- Medical information (such as doctors information, allergies, medication and dietary requirements)
- Attendance (such as sessions attended, session notes)
- Any previous or current agency support.
- Referral and assessment information (including from other organisation and agencies)
- Behavioural information (such as incidents, exclusions and sanctions)
- Photographs

How we collect your data:

We collect your data via consent forms, referral forms and assessments when you start your support and engagement with our Charity. One of the key GDPR principles is that data held is accurate and in order to achieve this each year we will seek confirmation of certain personal data.

Sharing information

We share information to ensure that you are receiving appropriate support. We do not share information about you with anyone without consent, unless the law and our policies allow us to do so. All data is transferred securely.

We routinely share information with:



- Schools, colleges and training providers
- The local authority
- Children and family support services
- Referring agencies

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information that we hold about you i.e. Subject Access Request. To make a request for your personal data, or be given access to your child/young person's record, please contact Ousmane Drame – URBOND Chief Executive Officer (CEO).