Data Protection and Privacy Policy

Circle of Life Rediscovery CIC (CLR) is registered with the Information Commissioner's Office (ICO). We are committed to protecting your privacy and handling your personal information fairly, lawfully, and transparently in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

What personal data we collect

We collect personal data that you provide to us, which may include:

- Contact details (name, address, phone number, email address, date of birth).
- Date of birth, health or dietary information (where relevant to participation in our programmes). **Health, wellbeing, dietary, or access needs information**, where relevant to safe participation in our programmes (this is treated as *special category data*)
- Payment details and financial details(where necessary for training, courses or events including bursaries and payment plans).
- Images or video, only where you have given explicit consent.
- For staff and volunteers: information needed for safer recruitment and safeguarding (e.g. NI number, references, DBS checks). **Staff and volunteer information** required for safer recruitment and safeguarding, including National Insurance number, references, and Disclosure and Barring Service (DBS) checks as well as training certificates, insurance and risk assessments

How we use your personal data

We use your data to:

- Deliver our programmes, training, community activities and events.
- Manage participation safely, including safeguarding and health considerations.
- Communicate with you about our work, events, and training (only where you have consented to receive communications, or where we rely on legitimate interests).
- Fulfil our legal and regulatory obligations, including safeguarding duties.

Legal bases for processing

We rely on the following legal bases:

- **Consent** – e.g. for newsletters, marketing communications, or the use of photographs and video. You can withdraw consent at any time.

- **Legitimate interests** – e.g. to run our events and programmes safely, manage bookings, or communicate with you in ways you would reasonably expect.

- **Legal obligation** – e.g. where we are required to share safeguarding concerns with statutory authorities.

- **Contract** – e.g. where you have booked onto a paid training course and we need your details to deliver the service.

Sharing your data

We will never sell or trade your personal information.

We may share personal data only with trusted third parties who support our operations, such as:

- IT and email service providers
- Event booking and payment platforms
- Accountants, insurers, or professional advisers

These providers only process data on our instructions and are contractually required to protect it.

Where information is transferred outside the UK (for example, where servers are based overseas), we ensure that appropriate safeguards are in place, in line with UK GDPR.

Storing your data

- Personal information is stored securely on encrypted systems with access restricted to authorised personnel only.

- Paper records are kept locked and destroyed securely when no longer needed.

- We retain personal data only for as long as necessary for the purposes collected. For example:

    - Safeguarding concerns around adult behaviour: until retirement age or for 10 years, whichever is longer
    - Safeguarding: Up to 25 years (or if related to a child, until the individual reaches 25)
    - Accident and incident records (adults): 3 years.
    - Accident and incident records (children and young people): until the individual is at the age of 25.
    - DBS Certificates held as Staff Records: Duration of employment plus 6 years

- Risk assessments related to programmes and staff delivery: minimum 5 years after the last review
- Staff and volunteer records: 7 years after employment or volunteering ends
- Staff and volunteer recruitment records: for unsuccessful applicants, 12 months after recruitment decision
- Training and booking records: 7 years.
- Financial records and payments: 7 years
- Mailing list data: until consent is withdrawn or you unsubscribe.
- Images and video recordings: until consent is withdrawn or content is no longer required.

Your rights

You have the following rights under the UK GDPR:

- To access the personal data we hold about you.
- To have inaccurate data corrected.
- To request erasure of your data ("the right to be forgotten").
- To restrict or object to processing in certain circumstances.
- To request transfer of your data to another provider ("data portability").
- To withdraw your consent at any time.
- To lodge a complaint with the **Information Commissioner's Office (ICO)** if you are unhappy with how we handle your data.

For more information on your rights, visit the ICO website: https://ico.org.uk.

Contact us

If you have questions about this policy, or wish to exercise your data rights, please contact us at:

info@circleoflifferediscovery.com

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