

Data Protection & Confidentiality Policy

J&V Activity Buddies

Owner: Vendula Kufuor

Organisation: J&V Activity Buddies

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1. Purpose of This Policy

J&V Activity Buddies is committed to protecting the privacy, dignity, and personal data of all individuals we support. This includes service users with special educational needs, disabilities, and vulnerable adults.

This policy explains how we collect, use, store, and protect personal information in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

2. Scope

This policy applies to:

- All staff, volunteers, contractors, and associates of J&V Activity Buddies
- All personal data collected in connection with service users, families, carers, and professionals
- All formats of data (paper, electronic, verbal communication)

3. Legal Framework

We comply with the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998 (Article 8 – Right to privacy)
- Care Act 2014 (where applicable)
- Safeguarding Vulnerable Groups Act 2006

4. Types of Information We Collect

We may collect and process the following personal data:

- Full name, address, date of birth
- Emergency contact details
- Medical information, disabilities, and support needs
- Behavioural, care, and activity support plans
- Risk assessments
- Attendance records
- Safeguarding-related information (where necessary)
- Photographs or media (only with consent)

5. Our Principles of Data Protection

We follow the UK GDPR principles:

- **Lawfulness, fairness, and transparency** – we process data legally and openly
- **Purpose limitation** – data is used only for specified care/support purposes
- **Data minimisation** – we only collect what is necessary
- **Accuracy** – information is kept up to date
- **Storage limitation** – data is not kept longer than needed
- **Integrity and confidentiality** – data is kept secure
- **Accountability** – we take responsibility for compliance

6. How We Use Personal Data

We use personal data to:

- Provide safe and appropriate activity-based support
- Plan and deliver individual care and support sessions
- Ensure safeguarding and risk management
- Communicate with families, carers, and professionals
- Maintain legal and regulatory compliance
- Improve service quality

We will never sell or share personal data for marketing purposes.

7. Confidentiality

All personal information is treated as strictly confidential.

We will only share information:

- With consent from the service user or their legal representative

- When required for safeguarding concerns
- When required by law (e.g. court order, police request)
- With relevant professionals on a need-to-know basis

All staff must:

- Not discuss service users outside of professional duties
- Not access information without legitimate reason
- Maintain confidentiality in all verbal and written communication
- Ensure conversations are held privately and securely

8. Data Storage & Security

We take appropriate technical and organisational measures to protect data:

Electronic data:

- Password-protected systems
- Secure devices only
- Limited staff access permissions
- Encryption where appropriate

Paper records:

- Locked filing cabinets
- Restricted access office areas
- Secure storage and controlled disposal (shredding)

Mobile working:

- No leaving sensitive documents unattended
- Devices locked when not in use

9. Data Sharing

We may share information with:

- Parents or legal guardians
- Social workers and healthcare professionals
- Local authority safeguarding teams
- Emergency services

All sharing is:

- Minimum necessary

- Secure
- Recorded where appropriate

10. Consent

Where required, we obtain informed consent before:

- Taking or using photographs/videos
- Sharing personal information beyond essential care needs
- Contacting third parties

Consent can be withdrawn at any time.

11. Data Breach Procedure

In the event of a data breach, J&V Activity Buddies will:

1. Contain the breach immediately
2. Assess risk to individuals
3. Notify the Information Commissioner's Office (ICO) within 72 hours if required
4. Inform affected individuals where appropriate
5. Take steps to prevent recurrence

12. Staff Responsibilities

All staff and volunteers must:

- Complete data protection training
- Follow confidentiality rules at all times
- Report suspected breaches immediately
- Only access data relevant to their role

Failure to comply may result in disciplinary action.

13. Data Subject Rights

Individuals have the right to:

- Access their personal data
- Request corrections
- Request deletion (where applicable)

- Restrict or object to processing
- Data portability (where applicable)

Requests will be handled within legal timeframes.

14. Policy Review

This policy will be reviewed annually or sooner if legislation changes.

15. Contact Details

Data Protection Lead / Owner: Vendula Kufuor

Organisation: J&V Activity Buddies

Email/Contact: jvhummingbirdinfo@gmail.com