



Data Protection and Privacy Policy

Purpose and Scope

This policy applies to Growing Resilience in Teens (GRIT), a Charitable Incorporated Organisation, registered number 1176272.

As a charity that processes personal data, particularly data about vulnerable individuals in our community, we are committed to ensuring that all teams involved in supporting these individuals understand our and those of our team in keeping personal data protected and meeting our legal obligations. This policy sets out our approach to meeting these commitments. Failure to follow the principles and controls set out in this policy could result in the charity being fined by the Information Commissioner's Office, being liable for compensation to individuals who are impacted by the failure, and the individual(s) responsible for the failure may be in breach of their contract with GRIT.

This policy applies to all individuals working within the charity, including Trustees, employees, contractors, volunteers, business partners, or other participants (collectively "colleagues"), and particularly those who have access to personal data we process in providing our support and services.

1. What is Personal Data and Special Category Personal Data?

Personal Data is any data that relates to a living individual who can be identified either directly from that information or indirectly from that data and other data that GRIT has access to.

Examples of where we might collect data that does not directly identify an individual is where we collect information about visitors to our website or take photographs or videos of individuals.

Special Category Data is personal data that is particularly sensitive, such as health data, data about someone's religion or ethnicity or their sexual preferences.

2. Aims

The aims of this policy are to:

Set out our approach to compliance with all aspects of data protection legislation and to ensure our colleagues understand the role they have to play in supporting our compliance, the limitations around the use and disclosure of the data we hold and how to obtain further guidance where needed.

3. Policy

UK Privacy and Data Protection laws centre around the UK General Data Protection Regulation which establishes a number of key principles that apply to the processing of personal data. These principles are:

3.1 Fair & Lawful Processing

Personal data must only be used in a legal and fair way, and we must be transparent about what we use it for.

We must ensure that personal data is only used for appropriate and ethical purposes and in line with the expectations of the individuals concerned (for example, for reasons we have set out in our Privacy Statement).

3.2 Proportionality and Data Quality

We must ensure that the personal data we collect is proportionate to what it is needed for.

We must keep personal data accurate and up to date.

We must only retain personal data for as long as there is a genuine need to keep the data.

3.3 Individual Rights

We must ensure that we respect the rights individuals have over the use of their data and have established procedures in place to ensure that these can be met.

3.4 Technical & Organisational Measures

We must keep personal data safe and secure.

We must ensure that any changes we make to our procedures and technology which impact on the use or storage of personal data are properly assessed to ensure that they can meet our privacy obligations.

GRIT does not permit the use of personal devices (e.g., laptops, phones, tablets) for storing or processing personal data relating to service users unless explicitly authorised by the Operations Manager. Where Bring Your Own Device (BYOD) is permitted, the device must be password protected, have up-to-date antivirus software, and data must only be accessed via secure, approved applications (e.g., encrypted cloud platforms). No personal data should be downloaded or stored locally on personal devices.

3.5 Accountability

The GRIT Trustees are accountable for ensuring that we have proper controls in place to meet the principles set out above and for ensuring that the Charity is able to provide evidence of its compliance. However, all our colleagues are responsible for supporting the Charity in meeting these obligations.

4. Meeting the Policy Principles

4.1 Lawful, fair and transparent processing

Our Obligations: We have a record of what personal data we hold and why we need it. This information is set out in our Privacy Statement which is available on our website and is provided to all of the individuals whose personal data is in our care.

It is the responsibility of the business Administrator to regularly check this record to ensure it's up to date.

Your Obligations: Any team member involved in making any changes to the data we process, must check in with the Operations Manager (or Data Protection Lead if differs) or a Trustee to ensure that it's an appropriate change and so that we can update our records where needed.

4.2 Proportionality and Data Quality

Our Obligations: We have procedures in place to ensure that we only record relevant information about individuals and checks to ensure that the data we have collected is accurate.

We have a data retention program in place which sets out specified time periods of retention (depending on the nature of the data and what we need it for). Information about the relevant

Registered office: Hitchin Youth Trust, 111 Walsworth Rd, Hitchin SG4 9SP

Telephone: 07514 472024 (24hr voice message) Email: hello@gritcharity.org Website: www.gritcharity.org Registered charity 1176272

retention times are shown in Appendix (i) to this Policy.

Your Obligations:

Operations Manager or Trustees are the only individuals that should update young adult records. Any other colleagues are not permitted to make any changes to the personal data we hold about individuals without the prior approval of the relevant Coach or Trustee.

Personal data must never be stored in files, applications, or databases outside of those approved by the Trustees as this may lead to personal data being retained beyond the permitted period. In the absence of a CRM, GRIT will password protect any documents containing personal data and store them in secure, access-controlled folders, ensuring they are regularly reviewed and deleted in line with our Data Protection and Privacy Policy.

4.3 Individual Rights

Our Obligations: We understand that individuals have rights over their personal data and we are ready to react to any individuals who wish to exercise their rights in respect of their own personal data. Requests are handled by the Trustees directly.

Your Obligations: It is the responsibility of every team member to make themselves aware of the rights individuals have and bring these to the attention of a Trustee immediately. Contact the Operations Manager for more information about these rights if you are ever asked about them by a young adult or guardian.

4.4 Technical and Organisational Measures

Our Obligations: We understand our obligations to protect the personal data we hold. These include ensuring only those that need access to certain records are able to access them and that personal data is only stored within approved applications.

Where we agree to use external communication tools, such as WhatsApp, we only permit their use on the basis that the individuals within a group agreed to participating and that no identifiable personal data is ever shared through this medium

Your Obligations: Colleagues must ensure that they never share records they have access to with other colleagues who don't have access, without prior authorisation from the Operations Manager.

All colleagues are responsible for ensuring that personal data is only recorded within approved applications and databases. Personal data must not be stored on personal devices or shared using private email accounts. Where colleagues take written notes during conversations, these should be transferred to the relevant approved files as soon as possible and the notes securely destroyed immediately thereafter.

Colleagues who use external communication tools must ensure that no identifiable personal data is shared within the app and ensure that any relevant communications are replicated within the approved internal databases where appropriate.

4.5 Accountability

Our Obligations: We will provide training, guidance and information to all teams on how to manage personal data that we collect to ensure that we use this in an ethical, transparent and compliant manner.

Your Obligations: All GRIT staff, trustees, volunteers are required to adhere to the GRIT Data Protection Policy and to undergo mandatory GDPR training. This will be provided during the induction period with refresher training being provided on a regular basis. Failure to attend the training or pass the training checks will be considered to be a breach of contract.

5. Status of this Policy

We expect everyone involved in GRIT to take their obligations to protect the personal data in our care and to follow the rules and any guidance we provide in this regard. Failure to do so will result in a breach of contract, which might result in us taking action or stopping someone from volunteering or otherwise working with us.

6. Further Information

If you have any questions about the information contained within this Policy, have concerns that we may have breached our obligations or just need to talk something through, please contact:

GRIT Management Team
18 Chiltern Rd
Hitchin
Herts SG4 9PJ

7. APPENDIX (i)

Retention Times for Young Adult Personal Data

Nature of the Data	Retention Time	Justification
Referrals where no Coaching Contract is agreed	6 Months after last contact with Young Adult	Individuals who do not progress to a coaching contract will be asked to reapply from scratch should they reengage with us after this period.
All Personal Data, Special Category Data and Coaching Data of Young Person entering into a Coaching Contract	7 Years after the Young Adults 24 th Birthday	Individuals who are offered a coaching contract can engage and re-engage with the Charity at any time up to the age of 24. The data is then retained for 7 years after this date to reflect any statute of limitations that may be relevant.
Contracted Coach Data	7 Years after termination of relationship with the individual	Term reflects any statute of limitations that may be relevant
Trustee Data	Lifetime of the Charity plus 7 years	This term reflects the obligations that Trustees have to the Charity and their accountability

Registered office: Hitchin Youth Trust, 111 Walsworth Rd, Hitchin SG4 9SP

Telephone: 07514 472024 (24hr voice message) Email: hello@gritcharity.org Website: www.gritcharity.org Registered charity 1176272

- Created by Clare Powell and Tom Gutteridge (2019/2020)
- Updated by: Rebecca Kelly on 31/10/24
- Approved by Dr Louise Randall, Chairman

Signature:

Date:

27/6/2025

Dr Louise Randall

- Next review date: 31/10/26