



Cuddington & Sandiway Youth Club Confidentiality and Data Protection Policy

Cuddington & Sandiway Youth Club

Cuddington & Sandiway Youth Club is committed to providing a safe environment for young people, workers and volunteers. Cuddington & Sandiway Youth Club recognises that trust is essential to good youth work and is the foundation of all relationships within Cuddington & Sandiway Youth Club. Maintaining confidences is an integral part of building trust between young people, team members and the organisation, and will be respected at all times, apart from where it conflicts with reporting child protection concerns.

In addition, the Data Protection Act places an obligation on all organisations to implement the 7 guiding principles when obtaining, handling and storing personal information. We embed these principles into our daily work through the following standards:

- **Lawfulness, fairness, and transparency:** We process data fairly and have a clear legal basis for doing so.
- **Purpose limitation:** We only collect information for specific, stated purposes.
- **Data minimisation:** We only collect the minimum amount of personal data necessary.
- **Accuracy:** We take reasonable steps to keep our records accurate and updated.
- **Storage limitation:** We do not hold personal data longer than necessary.
- **Integrity and confidentiality (Security):** We protect data against unauthorised access, loss, or damage.
- **Accountability:** We take responsibility for how we handle data and maintain clear documentation of our compliance.

Cuddington & Sandiway Youth Club therefore states:

Young People

Cuddington & Sandiway Youth Club is committed to ensuring that young people can share information with adult team members in a confidential manner.

Young people can expect that any information they give to an adult team member is treated as sensitive and confidential and will not be shared UNLESS:

- The adult team member believes that the young person, or another young person, is in danger or is being harmed. In this case, the young person will be

told that the information must be shared with the appropriate agencies and encouraged to agree with this.

- The young person discloses that they are involved, or plan to become involved, in acts of terrorism.

Workers/Volunteers

All workers/volunteers at Cuddington & Sandiway Youth Club are expected to uphold the organisation's commitment to confidentiality. This means that adult team members are expected to:

- Keep records, files and documents stored in a safe and secure manner
- Not discuss any information given by a young person in confidence, unless they have a child protection concern or the young person gives their permission
- Tell a young person when information cannot be kept confidential (i.e. a child protection concern)
- Encourage a young person to talk to other people (e.g. parents or guardians) or professionals where they feel it would be in the young person's interest

Workers/volunteers can expect that the organisation will:

- Provide them with a suitable means for storing confidential documents
- Ensure that their own information (e.g. medical or emergency contact information, information contained in their personnel file) is stored securely, is kept confidential and only seen by colleagues in relation to their role
- Safely destroy personal information when the worker/volunteer ceases to work/volunteer for the organisation, except where employment law or financial regulations require records to be retained for a standard period (typically 6 years for financial or core personnel data)
- Take disciplinary action where the Confidentiality Policy is not upheld (unless due to child protection concerns or a court order has been issued)

Parents/Guardians

Parents/Guardians of young people attending Cuddington & Sandiway Youth Club can expect that the information they provide (e.g. medical information, contact information) will:

- Be kept in a secure, confidential manner and only used for the purpose provided (i.e. to safeguard the health and wellbeing of the young person)
- Enable the club to ensure that parents/guardians receive information from the club that is necessary, e.g. newsletters, letters and emails regarding information about upcoming events and club activities.
- Not be sold

Data Retention and Storage Timelines

To maintain compliance, data will not be kept indefinitely. Cuddington & Sandiway Youth Club applies the following retention periods:

- General Attendance and Contact Details: Retained for up to 3 years after the young person ages out (at 18 years old) of Cuddington & Sandiway Youth Club attendance, then securely destroyed.
- Safeguarding and Child Protection Records: Kept securely until the young person reaches the age of 25 (in line with standard UK youth sector safeguarding practices), at which point they are permanently destroyed.

Your Rights Under UK GDPR

Individuals (including young people, parents/guardians, and workers/volunteers) have legal rights regarding their data. You have the right to request access to the information we hold about you (a Subject Access Request), request that incorrect data be corrected, or request data deletion where appropriate. To exercise these rights, please contact the Cuddington & Sandiway Youth Club Lead Youth Worker, Alison Wright, via alisonwrightpersonal@gmail.com.

APPENDIX ONE – The Seven Golden Rules of Information Sharing

The "Seven Golden Rules of Information Sharing" are a framework originally published by the UK Government (frequently utilised in safeguarding and data protection) to help professionals balance an individual's right to privacy with the need to protect vulnerable people from harm.

The seven rules are:

1. Data protection laws are not barriers: Legislation like GDPR and the Data Protection Act are designed to ensure the right information is shared in the right way, not to stop justified information sharing.
2. Be open and honest: Unless it creates a safety risk, be clear with individuals and their families from the outset about what information you hold and why you might need to share it.
3. Share with consent wherever possible: Seek informed consent from the beginning. However, if safety is at risk, you can still share information without consent if you have a lawful basis to do so.
4. Consider safety and well-being: Always base your decisions on the safety and well-being of the individual and anyone else who may be affected by their actions.
5. Seek advice if in doubt: You do not have to share identifying details to ask a manager, safeguarding lead, or agency (like the police) for advice on handling a specific situation.
6. Ensure information is necessary, proportionate, and secure: Only share what is strictly necessary to address the situation and only share it with the relevant people who need to know, in a timely and secure manner.
7. Keep a record: Always document your decisions and the reasons behind them, including exactly why you chose to share the information or why you decided not to.

Policy Control and Approval Record

This policy was formally reviewed, approved, and adopted by the Management Committee of Cuddington & Sandiway Youth Club.

- Date of Committee Approval: 08/09/2026
- Next Mandatory Review Date: September 2027