

Privacy Policy

Effective Date: 01/01/2026

Review Date: 01/01/2027

1. Introduction:

Green Roots Connections (“we”, “us”, or “our”) is a registered limited company by guarantee with Company House provides inclusive social events, peer-led activities, for neurodivergent and disabled young people. We are committed to protecting and respecting your privacy and complying with our obligations under:

- The UK General Data Protection Regulation (UK GDPR).
- The **Data Protection Act 2018**.
- The **Privacy and Electronic Communications Regulations (PECR)**.
- Other relevant safeguarding and children’s data protection legislation.

This Privacy Policy outlines how we collect, use, store and protect your personal data, and your rights in relation to that data.

2. Who We Are:

- **GREEN ROOTS CONNECTIONS**
Company Registration Number: **17071795**.
- Registered Address: 122 Rosemary Avenue, Hounslow TW4 7JW
Website: www.greenrootsconnections.uk
- Website: <https://greenrootsconnections.uk>
- Email: admin@greenrootsconnections.uk

We are the **data controller** for the purposes of data protection law.

3. What Data We Collect.

- We may collect and process the following personal and sensitive data from parents, carers, and young people:
- **Personal Data:**
 - Parents/guardians full names
 - Contact details (phone number, email address, home postcode)
 - Child’s full name, age, gender, pronouns
 - Emergency contact details
 - Attendance records for sessions or events

Special Category (Sensitive) Data:

- Diagnoses, medical or access needs (e.g., autism, epilepsy, mobility support, communication skills)
- Personal preferences and interests
- Information relevant to safeguarding (e.g., risk assessments or behaviour concerns)
- Consent forms for media use, activity participation, and data sharing

4. How We Collect Data.

We collect personal data in the following ways:

- Through online registration forms
- During event sign-ups and workshops
- Through direct communication with parents/guardians
- Through safeguarding professionals (with lawful basis)
- From feedback forms, surveys, or check-ins

5. Lawful Basis for Processing.

- We process personal and special category data under the lawful bases defined by the UK GDPR:
- **Data Type**
- **Lawful Basis**
- **Description**
- Registration data.
- Consent / Contract.
- You provide consent or sign up for our services.
- Health and support needs.
- Explicit Consent.
- We require your explicit consent to store and use this data.
- Safeguarding information.
- Legal Obligation / Public Task.
- Required to comply with child protection and safety laws.
- Emergency contact details.
- Vital Interests.
- In case of emergency to protect life or wellbeing. Communications (email/message).

- Consent / Legitimate Interests to keep you informed about sessions and updates.

6. What We Use Your Data For.

We use your personal data to:

- Register young people for events and workshops
- Provide inclusive and safe environments
- Implement safeguarding procedures and duty of care
- Communicate with families about schedules, changes, or emergencies
- Create anonymized monitoring reports for funders or impact assessments
- Fulfil our legal and regulatory obligations as a CLG
- Respond to incidents, complaints or concerns

7. Sharing of Data.

We will never sell or rent your personal information. We may share data only when:

- **You give explicit consent**, e.g., sharing phone numbers for lift-shares or social reasons prior to an event
- **Required by safeguarding legislation**, e.g., referral to a social worker or NHS
- **With trusted service providers**, such as therapeutic facilitators or venue partners (under data processing agreements)
- **When legally obligated**, e.g., to a court or regulatory authority

All third-party providers are required to comply with UK GDPR and process your data securely.

8. How We Store and Secure Your Data.

We store personal data securely using encrypted and password-protected systems, including:

- Limited access to authorised team members.
- **Google Workspace** with two-factor authentication
- Lockable filing cabinets for physical records (e.g., consent forms)
- We carry out regular data audits and have policies in place for handling data breaches, in line with ICO guidance.

9. Data Retention.

We retain data only as long as necessary:

- **Data Type**
- **Retention Period**

Registration and participation data:

- 5 years from last contact.
- Safeguarding records: 7–25 years (as per legal requirement).
- Communications and feedback: 1–2 years.
- Consent forms: Duration of engagement, then securely deleted.

Once data is no longer needed, it will be securely deleted or anonymized.

10. Website, Cookies & Digital Data.

When you visit our website, we may collect:

- **Cookies:** small data files stored on your device (only with your consent via cookie banner)
- **Analytics data:** usage patterns to help us improve services (non-identifiable).

We comply with PECR and give you the option to opt in/out of non-essential cookies. A full Cookie Policy is available on our website.

11. Your Rights Under the UK GDPR.

You have the following rights regarding your personal data:

- **Right to access** – request a copy of the data we hold about you
- **Right to rectification** – correct inaccurate or incomplete data
- **Right to erasure** – request deletion of data in certain circumstances
- **Right to restrict processing** – request we stop using your data in certain ways
- **Right to object** – object to how we process data where lawful basis is legitimate interest
- **Right to data portability** – request your data in a transferable format
- **Right to withdraw consent** – where processing is based on consent
- **Right to complain** – to the Information Commissioner's Office (ICO).

You can exercise any of these rights by contacting us directly at admin@greenrootsconnections.uk.

- If you are not satisfied with our response, you can contact the Information Commissioner's Office at:
- www.ico.org.uk | Tel: 0303 123 1113

12. Children's Data and Consent.

Where the data subject is under the age of 13, we require parental or guardian consent to collect and process their personal data. For young people aged 13 and over, we may accept consent directly from the young person, in line with UK data protection law and safeguarding best practice.

This decision will also take into account the individual's capacity to understand the nature and implications of consent, which will be assessed on a case-by-case basis in consultation with primary caregivers or support professionals as appropriate.

We take extra care when processing children's data, in accordance with:

- The Age Appropriate Design Code
- UK GDPR principles of transparency and fairness
- Our internal Safeguarding and Consent Policy.

13. Data Breach Procedures.

In the event of a data breach, we will:

- Inform affected individuals without undue delay if the breach is likely to result in a high risk to their rights and freedoms
- Notify the Information Commissioner's Office (ICO) within 72 hours if the breach is significant
- Take appropriate measures to investigate and mitigate the effects of the breach, including offering support to affected individuals

We will also make clear how individuals can seek support if their data is compromised.

14. Use of Images and Media.

- Green Roots Connections values the privacy and dignity of all individuals, particularly the young people we support. Any photographs, videos, or other media taken during our events, workshops or activities will be used only with explicit consent. This section outlines how we handle images and media:

Types of Media Collected:

- **Photographs:** Pictures taken during events, workshops, and activities
- **Videos:** Recordings of sessions, performances, or activities
- **Audio:** Recordings made as part of therapeutic or group discussions, with prior consent.
- **Consent for Use:**
- **Prior Consent:** We will ask for your explicit consent before using any images or videos that include young people. Consent will be obtained through a specific consent form detailing how and where the media will be used (e.g., on our website, social media, promotional materials).
- **Withdrawal of Consent:** Individuals (or their guardians, if applicable) may withdraw consent at any time by contacting us directly. Upon withdrawal, we will make reasonable efforts to remove the media from public-facing platforms where it has been used.

Use of Media:

- **Promotional Use:** Images and videos may be used to promote our services, share success stories, or raise awareness of our work through our website, social media platforms, newsletters, or brochures
- **Internal Use:** Some images or videos may be used for internal training, evaluation, or reporting purposes

Sensitive Media:

We recognise the potential for some individuals to have specific preferences or restrictions regarding the use of images or media. If a participant has additional needs, such as a requirement for anonymity or restrictions on sharing media, we will always ensure that these are respected in accordance with the consent provided.

Safeguarding and Privacy:

We are committed to safeguarding the privacy of all individuals. No media will be shared or published without prior consent, and any media used will be handled with sensitivity and care, in compliance with our **Safeguarding and Consent Policy**.

15. Support for Users with Accessibility Needs.

We are committed to ensuring that all users, including neurodivergent and disabled individuals, can easily understand and navigate our Privacy Policy. If you require assistance in accessing, understanding or exercising your data protection rights, or if you need information presented in an alternative format,

please contact us at admin@greenrootsconnections.uk. We are happy to provide extra support where needed to ensure accessibility and clarity.

16. Changes to This Policy.

This policy may be updated to reflect changes in law or practice. We will notify families and partners of any significant updates, and the most recent version will always be available on our website.

- **Contact Details.**

For all data protection queries or to exercise your rights, contact:

- Green Roots Connections.
- Email: admin@greenrootsconnections.uk
- Website: <https://greenrootsconnections.uk>