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UK GDPR and Data Protection Policy

Introduction

The UK General Data Protection Regulation (“UK GDPR”) together with the Data Protection Act 2018 provides the legal framework for managing and protecting personal data within the United Kingdom. These laws require organisations to have a clear understanding of the personal data they hold, the lawful basis for processing it, and to ensure that personal data is only used for specified and legitimate purposes.

Drop Zone Youth Projects is committed to ensuring that all personal data is processed lawfully, fairly, transparently and securely. Appropriate technical and organisational measures will be implemented to protect personal data against unauthorised or unlawful processing, accidental loss, destruction or damage.

The organisation will maintain procedures for identifying, reporting, managing and, where required, notifying personal data breaches to the Information Commissioner’s Office (ICO).

This policy sets out the responsibilities of employees, volunteers, trustees, managers and third parties who process personal data on behalf of Drop Zone Youth Projects.

Purpose

The purpose of this UK General Data Protection Regulation Policy is to ensure that Drop Zone Youth Projects, including employees, sessional staff, volunteers, partners (and their staff) and the Board of Trustees, understand their obligations under UK GDPR and the Data Protection Act 2018.

Drop Zone Youth Projects holds and processes personal information about people we provide services for carry out other business with, including:

- Customers
- Trustees
- Suppliers
- Employees
- Young people

People who provide us with their personal data expect us to protect their data and only use it for the lawful purposes we collected it for.

Scope

All the personal data we hold must be dealt with lawfully and properly. We need to ensure we collect it, store it and process it in a manner that safeguards the privacy of the individuals. The rules relating to the processing of data are governed by the UK GDPR and the Data Protection Act 2018. The Regulation sets out a framework based on a set of data protection principles.

This policy identifies designated personnel and their responsibilities.

Procedures relating to the collection, processing, storage, retention and disclosure of personal information are referenced in this policy.

Supporting legislation

The legislation below informs Drop Zone Youth Projects' data protection arrangements.

Legislation	Purpose
UK General Data Protection Regulation (UK GDPR)	Provides the legal framework for the processing and protection of personal data within the United Kingdom.
Data Protection Act 2018	Supplements the UK GDPR and sets out exemptions, enforcement powers and additional data protection provisions under UK law.
Human Rights Act 1998	Article 8 provides individuals with the right to respect for their private and family life, home and correspondence.
Crime and Disorder Act 1998	Section 115 permits the sharing of information with relevant authorities where necessary for the purposes set out within the Act and associated legislation.
Freedom of Information Act 2000 (where applicable)	Provides public access rights to certain organisational information, subject to exemptions.

This policy also reflects amendments introduced through the Data (Use and Access) Act 2025 where applicable.

Definitions

Personal Data

Personal data for GDPR purposes is defined as:

data which relate to a living individual who can be identified –

(a) from those data, or

(b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,

also includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

Also includes:

Name

Address

Email Address

Photograph

Bank details

National insurance number

Medical information
Posts on social media sites
Computer IP address

Special category data

UK GDPR also makes provision for handling special category data (formerly sensitive data). These types of data could create more significant risks to a person's fundamental rights and freedoms. For example, by putting them at risk of unlawful discrimination and therefore needs more protection. For example, information about an individual's:

Special category data includes

- Biometric data used for identification
- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Genetic data
- Health data
- Sex/Sexual orientation

The Data controller

Drop Zone Youth Projects is the data controller and is accountable for ensuring the data is processed correctly and securely.

Data processors

Any worker with line management responsibility, this includes supervisors.

All staff, including temporary/sessional staff, trustees, and volunteers working for Drop Zone Youth Projects

Information Asset

Data on any media format created, processed and used by Drop Zone Youth Projects. Media formats may vary from paper copies; electronic files stored on hard drives, USB flash memory devices, CD's, DVD's, back-up tapes etc.; to voice mail. An alternate definition - Information that has value to the extent that it enables an entity to achieve goals and thus is an asset like people, money, and material.

Data Subject

The data subject is any living individual about whom data is processed.

Processing

Processing in relation to data (or information) means virtually any use that can be made of the data, from collecting the data, using it, storing it, and destroying it. It is difficult to envisage any action involving data, which does not amount to processing within this definition.

Manual Data

Manual data refers to structured paper records and filing systems that fall within the scope of the UK GDPR and Data Protection Act 2018.

Data Protection Principles

Under UK GDPR, personal data must be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of data subjects for no longer than is necessary;
- f) processed securely using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage;
- g) transferred outside the United Kingdom only where appropriate safeguards and lawful transfer mechanisms are in place in accordance with UK GDPR.

Lawful basis for processing data

The lawful reasons for processing data are:

- 1: We have positive consent from the data subject or legal guardian if under 16 (consent by default is not permitted e.g. pre-ticked boxes)
- 2: Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
- 3: Processing is necessary for compliance with a legal obligation.
- 4: Processing is necessary to protect the vital interests of a data subject or another person.
- 5: Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- 6: Processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

Governance of personal data

The board of trustees

The board of trustees has overall responsibility for data protection

CEO (Data Protection Officer)

The CEO acts as Drop Zone Youth Projects' designated leads for data protection compliance. Their role is to

- to inform and advise the controller or the processor and the employees who are processing personal data of their obligations pursuant to this Regulation;
- to monitor compliance with the UK GDPR and other data protection laws, including managing internal data protection activities, awareness- raising and training of staff involved in the processing operations, and the related audits;
- to provide advice where requested as regards the data protection impact assessment and monitor its performance pursuant to Article 35;
- to cooperate with the supervisory authority (the ICO in the UK);
- to act as the contact point on issues related to the processing of personal data
- Shall in the performance of his or her tasks have due regard to the risk associated with processing operations, considering the nature, scope, context and purposes of processing

All correspondence with the Information Commissioner on Data Protection matters will be dealt with by the Data Protection Officer.

Requests for personal data are referred to the Data Protection Officer.

The Corporate Support Manager will provide advice in all matters relating to GDPR

Information Sharing Agreements will be signed on behalf of Drop Zone Youth Projects by a Data Protection officer

Line Staff

All line staff are responsible for ensuring that this policy is communicated and implemented within their area of responsibility. They are responsible for the quality, security, and management of personal data in use in their area.

They also need to ensure that their staff are aware of their responsibilities under UK GDPR. Advice or assistance regarding this policy or UK GDPR in general is available from the Data Protection Officer.

Line staff are responsible for reporting all data protection and information related incidents to the Data Protection Officer, and for ensuring that they are properly investigated

Trustees

Trustees acting for or on behalf of Drop Zone Youth Projects must be aware of their obligations and responsibilities with regard to the collection and processing of personal data under the provisions of the UK GDPR and the Data Protection Act 2018 and it is the intention of Drop Zone Youth Projects to comply with all aspects and requirements of the Act.

Trustees have an individual responsibility to keep themselves aware of Drop Zone Youth Projects policies, including data protection and information security policies.

Trustees are expected to co-operate in full with any investigation undertaken by (or on behalf of) Drop Zone Youth Projects into an alleged breach of the regulation.

All Staff

All staff have a responsibility to ensure they are aware of their obligations and responsibilities under Drop Zone Youth Projects GDPR Policy.

All staff should notify their line manager if they feel they do not have sufficient knowledge regarding UK GDPR so specific training can be provided.

Staff Members are expected to co-operate in full with any investigation undertaken by (or on behalf of) Drop Zone Youth Projects into an alleged breach of the regulation.

UK GDPR Awareness

Training

Drop Zone Youth Projects will ensure that staff, volunteers and trustees are made aware of their responsibilities in relation to UK GDPR and data protection legislation through training and induction procedures.

This policy will be reviewed annually and agreed by the Board of Trustees.