



DIVINE BUZZ – DATA PROTECTION POLICY

(Aligned with UK GDPR & Data Protection Act 2018)

1. Purpose of This Policy

Divine Buzz is committed to protecting the rights and privacy of all individuals whose personal data we process. This policy sets out how we collect, use, store, share, and protect personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- ICO guidance and safeguarding requirements

This policy applies to all **staff, contractors, volunteers, trustees, and anyone working on behalf of Divine Buzz.**

2. Scope

This policy covers all personal data processed by Divine Buzz, including data relating to:

- Staff, contractors, and volunteers
- Children and young people attending our programmes
- Parents, carers, and families
- Donors, funders, and partners
- Visitors, suppliers, and stakeholders

It applies to all data held in:

- Paper files
- Digital systems
- Email accounts
- Mobile devices
- Cloud-based platforms
- CCTV and access systems



3. Definitions

Personal Data

Any information that identifies an individual (e.g., name, address, email, phone number, ID numbers).

Special Category Data

Sensitive information requiring extra protection, including:

- Health
- Race or ethnicity
- Religion or belief
- Sexual orientation
- Biometric data
- Safeguarding information

Processing

Any action performed on data, including collecting, storing, sharing, deleting, or analysing.

Data Subject

The individual whose data is being processed.

Data Controller

Divine Buzz — responsible for determining how and why data is processed.

Data Processor

Any third party processing data on our behalf (e.g., payroll providers, IT services).

4. Data Protection Principles

Divine Buzz adheres to the seven principles of UK GDPR. Personal data must be:

1. **Processed lawfully, fairly and transparently**
2. **Collected for specified, explicit and legitimate purposes**
3. **Adequate, relevant and limited** to what is necessary
4. **Accurate and kept up to date**
5. **Kept no longer than necessary**
6. **Processed securely**
7. **Handled with accountability**, demonstrating compliance at all times

5. Lawful Bases for Processing

Divine Buzz processes personal data under the following lawful bases:



- **Contract** – to deliver employment or volunteer agreements
- **Legal obligation** – safeguarding, right-to-work checks, tax requirements
- **Legitimate interests** – operational management, security, programme delivery
- **Consent** – optional activities such as marketing or photography
- **Vital interests** – protecting someone’s life in an emergency
- **Public task** – where delivering services in the public interest

Special category data is processed only when:

- Explicit consent is given
- Required for employment law
- Necessary for safeguarding or substantial public interest
- The individual has made the information public

6. Roles and Responsibilities

Directors and Senior Leaders

- Ensure compliance with UK GDPR
- Approve policies and oversee data protection governance
- Respond to data breaches and ICO communications

All Staff, Contractors and Volunteers

Must:

- Follow this policy and all data protection procedures
- Complete mandatory data protection and safeguarding training
- Report data breaches immediately
- Handle personal data securely and confidentially

Data Protection Lead (if appointed)

- Oversees day-to-day compliance
- Maintains records of processing activities
- Supports staff with data protection queries

7. Data Collection and Use

We collect personal data only when necessary for:

- Recruitment, HR, and volunteer management
- Safeguarding and welfare



- Programme delivery and attendance
- Communication with families and stakeholders
- Monitoring, evaluation, and reporting
- Legal and regulatory compliance

Data must only be used for the purpose for which it was collected.

8. Data Sharing

We may share data with:

- Regulatory bodies (e.g., DBS, local authorities)
- Emergency services
- IT and HR service providers
- Funders (anonymised where possible)
- Prospective employers (references)

We **do not** share data with third parties for marketing.

We **do not** transfer data outside the UK/EEA without appropriate safeguards.

All third-party processors must sign a **Data Processing Agreement (DPA)**.

9. Data Security

Divine Buzz uses appropriate technical and organisational measures to protect data, including:

- Password-protected systems
- Encrypted devices
- Secure cloud storage
- Access controls and role-based permissions
- Locked filing cabinets
- CCTV and access logs
- Staff training in data protection and safeguarding

Personal data must **never** be stored on personal devices without authorisation.

10. Data Retention

Data is retained only as long as necessary.

Standard retention periods include:

- Personnel files: **6 years** after employment/volunteering ends



- Safeguarding records: **up to 75 years**, depending on case type
- Financial records: **6 years**
- Attendance registers: **3 years**
- CCTV footage: **30–90 days**, unless required for investigation

After the retention period, data is securely destroyed.

11. Data Subject Rights

Individuals have the right to:

- Be informed
- Access their data
- Rectify inaccuracies
- Request erasure (where applicable)
- Restrict processing
- Data portability
- Object to processing
- Challenge automated decision-making

Requests must be responded to within **one month**.

12. Data Breach Procedure

A data breach includes:

- Loss of data
- Unauthorised access
- Accidental disclosure
- Cyber-attack
- Theft of devices

All breaches must be reported **immediately** to the Director or Data Protection Lead.

Where a breach poses a risk to individuals, the ICO must be notified within **72 hours**.

A record of all breaches will be maintained.



13. Training and Awareness

All staff, contractors, and volunteers must complete:

- Induction training on data protection
- Annual refresher training
- Safeguarding training (as required)

Additional training is provided for those handling sensitive data.

14. Monitoring and Review

This policy is reviewed **annually** or sooner if:

- Legislation changes
- ICO guidance updates
- A significant incident occurs
- Organisational changes require it

15. Contact

For questions or concerns about data protection, individuals may contact:

Divine Buzz – Ellen Otchere

Signature:

Email: Divinebuzz

Contact details: **07951922324**

Address: 11 Pellipar Gardens, SE18 5EG

Date of last review: 30/01/2026

Date of next review: 30/01/27