



Privacy Notice

Who We Are

Positive Young Futures CIC (PYF) provides face-to-face and online education, mentoring, and community learning for young people, including those who are in mainstream education, NEET (Not in Education, Employment or Training), home educated, or referred through County Councils and partner agencies.

We are committed to protecting your privacy and ensuring your personal information is handled lawfully, securely, and transparently in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Contact Details

Data Controller: Positive Young Futures CIC
Email: office@positiveyoungfutures.org.uk
Telephone: 07368967570

Data Protection Officer (DPO): Mr Darren cox
Darrencox@positiveyoungfutures.org.uk
ICO Registration Number: ZC010827

Purpose of This Notice

This Privacy Notice explains:

- what personal data we collect;
- why and how we use it;
- who we share it with; and
- how we protect your rights.

It applies to everyone whose personal data we process, including:

- Learners and parents/carers
- Staff, volunteers, and applicants
- Funders, donors, and supporters
- Professionals and partner organisations
- Visitors to our website or social media pages

When PYF Acts as a Data Controller or Processor

- **As a Data Controller:** PYF controls and manages data for its own learners, staff, and supporters.
- **As a Data Processor:** PYF may process personal data on behalf of Suffolk County Council or another commissioner, following their written instructions and retention policies.

When acting as a processor, PYF will only handle data as instructed, keep it secure, and support the controller in meeting all UK GDPR requirements.

What Personal Data We Collect

For learners and parents/carers

- Name, date of birth, contact details
- Parent/carer details
- Education and attendance records
- Progress, behaviour, and assessment data
- Health, medical, and safeguarding information (where necessary)
- Photographs, video, or digital work (where consented)

For staff, volunteers, and applicants

- Name, address, contact details
- Employment and reference records
- DBS and safeguarding checks
- Payroll and training records

For funders, donors, supporters, and professionals

- Contact and business details (organisation, role, email, address, phone)
- Donation, funding, or partnership details
- Communication preferences and records
- Publicly available information relevant to partnership or funding (e.g. from charity registers or websites)

For website visitors and social media users

- IP address, browser type, device information, and pages visited
- Messages or contact details submitted through online forms or direct messages
- Cookie and analytics information (anonymous where possible)

How We Collect Personal Data

We collect information in several ways:

- Directly from you (forms, email, phone, social media, in-person, referrals)
- Through our website, online platforms, or learning systems
- From partner organisations such as SCC, schools, or social services (where lawful and necessary)
- From public sources such as funder directories or charity databases (for legitimate interest purposes)

Why We Use Personal Data

We process personal information to:

- Deliver education, mentoring, and support services
- Safeguard children and young people
- Communicate with learners, families, and professionals
- Manage employment, training, and HR responsibilities
- Administer donations, contracts, or grants
- Provide updates to funders, donors, and supporters
- Promote and evidence our charitable work (with consent where required)
- Monitor website usage, improve accessibility, and manage online engagement

Lawful Bases for Processing

We process personal data under one or more of the following legal bases:

- **Public task:** to provide education and welfare services under statutory duty or local authority contract
- **Contract:** to fulfil an agreement with you or your organisation
- **Legal obligation:** to meet safeguarding, financial, audit, or reporting duties
- **Vital interests:** to protect someone's life or wellbeing
- **Legitimate interests:** for stakeholder engagement, fundraising, and service improvement
- **Consent:** for optional communications, photography, or marketing activity

Where we rely on consent, you can withdraw it at any time by contacting us.

Special Category and Safeguarding Data

PYF works with children, families, and vulnerable individuals.

We may process special category data (e.g., health, ethnicity, safeguarding) only when it is:

- necessary for safeguarding or social protection purposes;
- required under law; or
- explicitly consented to by the individual or guardian.

Such data is handled with the highest level of confidentiality and shared only with appropriate professionals when lawful and necessary to protect a child or adult at risk.

Who We Share Data With

We may share personal data, when necessary and lawful, with:

- **Local authorities**
- **Awarding bodies** and education partners

- **Social care, police, and NHS services** (for safeguarding)
- **Funding bodies and auditors** (for reporting and compliance)
- **Technology providers** (e.g. secure cloud, learning, or communication platforms)
- **Donation, event, and email systems** (for supporters, under data processing contracts)

We only share the minimum necessary data and ensure all third parties meet UK GDPR standards.

International Transfers

All personal data is stored within the UK or EEA.

If a third-party provider (e.g. cloud service) transfers data outside the UK/EEA, it will be protected by a UK-approved safeguard such as the **International Data Transfer Agreement (IDTA)**.

10. Data Retention

We keep personal data only as long as necessary for its purpose, or as required by law.

Data Type	Retention Period	Disposal Method
Learner and parent/carer records	5 years after leaving	Secure deletion
Safeguarding files	Until learner's 25th birthday	Secure deletion
Staff records	6 years after employment ends	Secure deletion
Financial and audit records	7 years	Secure deletion
Donations and funding records	6 years after financial year end	Secure deletion
Professional and training contacts	3 years after last interaction	Secure deletion
Website analytics data	Per platform retention (anonymised)	Automatic deletion

Website, Cookies, and Analytics

Our website uses **cookies** to improve your experience.

- Essential cookies help the site function properly.
- Analytics cookies help us understand visitor numbers and site use (e.g., Google Analytics). These do not identify you personally.
You can manage or disable cookies in your browser settings at any time.

We use secure third-party platforms for newsletter subscriptions and analytics. These services collect limited engagement data (e.g., email opens and link clicks) to help us improve communications.

Social Media

If you contact PYF via social media (e.g., Facebook, Instagram, X), messages are stored securely on the platform or via our social media management tool.

Messages are not shared with other organisations and are deleted within three months unless required for safeguarding or service records.

Data Security

We have strong technical and organisational controls to protect your information:

- Encrypted devices and password-protected systems
- Role-based access controls
- Secure file storage and locked facilities
- Regular staff training and data audits
- Incident response and breach notification processes

Kajabi Online Learning Platform

Positive Young Futures CIC delivers part of its education and mentoring provision through Kajabi, a secure online learning platform. Kajabi acts as a data processor on behalf of Positive Young Futures CIC.

Kajabi's systems are hosted on Amazon Web Services (AWS) infrastructure and meet international information security standards including ISO/IEC 27001. All data transferred between users and the platform is protected using SSL encryption and multi-factor authentication.

Kajabi complies with the UK GDPR and the Data Protection Act 2018, and has a Data Processing Agreement (DPA) in place to ensure personal data is processed only as instructed by Positive Young Futures CIC.

Personal data stored on Kajabi is limited to information required for educational delivery, such as login credentials, learning progress, and communication history. No payment or highly sensitive data is stored on Kajabi.

Further details about Kajabi's privacy and security practices are available at: <https://kajabi.com/policies/privacy>.

Data Breaches

If we become aware of a data breach that poses a risk to individuals' rights or freedoms:

- We will notify the **Information Commissioner's Office (ICO)** within 72 hours (if required).
- We will inform affected individuals promptly where there is a high risk.
- All breaches are recorded and reviewed to prevent recurrence.

Your Data Protection Rights

You have the right to:

- Access your data (Data Subject Access Request)
- Rectify inaccuracies
- Request erasure where appropriate
- Restrict processing in certain cases
- Object to processing (e.g., marketing)

- Request data portability

Requests can be made to the DPO at Darrencox@positiveyoungfutures.org.uk. We will respond within one calendar month.

If you are not satisfied, you may contact the **Information Commissioner’s Office**:
0303 123 1113
www.ico.org.uk

Confidentiality and Staff Responsibilities

All staff, volunteers, and contractors:

- Sign a confidentiality agreement;
- Only access data they are authorised to;
- Complete annual data protection training; and
- Must report any suspected breach immediately to the DPO.

Failure to follow these rules may result in disciplinary action.

Fundraising, Marketing, and Communications

PYF values the support of funders and donors. We may use your contact information to:

- Thank you for your support
- Send newsletters or updates (where you have subscribed)
- Invite you to events or training sessions
- Share stories of impact (with consent)

You can unsubscribe or change your preferences at any time by emailing info@positiveyoungfutures.org.uk.

We do **not** sell or trade your personal information.

Monitoring, Audit, and Review

The DPO conducts regular audits of data protection compliance. Findings are reviewed by the Education Director and, where applicable, shared with Suffolk County Council. This Privacy Notice is reviewed annually or earlier if laws, systems, or services change.

Applies to: All staff, volunteers, contractors, learners, and partners

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