

## **Data Protection and Information Governance Policy**

**Last updated: 25th June 2026**

**Next review: 25th June 2027**

### **1. Our commitment**

Participation People is committed to protecting the privacy, rights and personal information of everyone we work with.

We recognise that children, young people, families, partners, clients, employees and stakeholders trust us with their information. We take that responsibility seriously and are committed to handling personal data lawfully, fairly, securely and transparently.

Good information governance supports the quality of our services, strengthens safeguarding, builds trust and helps ensure we meet our legal and ethical responsibilities.

### **2. Purpose**

This policy explains how Participation People protects personal information and ensures that information is collected, used, stored, shared and disposed of responsibly.

It demonstrates our commitment to:

- complying with UK data protection legislation
- protecting the confidentiality, integrity and availability of information
- respecting the rights of individuals
- maintaining high standards of information governance
- continually improving our data protection practices.

### **3. Scope**

This policy applies to all personal information processed by Participation People, regardless of format.

It covers information relating to:

- children and young people
- parents and carers
- employees
- volunteers
- consultants
- suppliers
- partners
- clients
- commissioners
- website users
- any other individual whose personal information we process.

It also applies to everyone working on behalf of Participation People, including employees, contractors, volunteers and third parties with authorised access to our information.

## **4. Our data protection principles**

Participation People processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are committed to ensuring personal information is:

- processed lawfully, fairly and transparently
- collected for specified, explicit and legitimate purposes
- limited to the information that is necessary
- accurate and kept up to date
- retained only for as long as necessary
- processed securely to protect against unauthorised access, loss, misuse or disclosure.

These principles guide every aspect of how we manage information across the organisation.

## **5. The information we collect**

Participation People only collects personal information that is necessary to deliver our services, meet our legal obligations and communicate effectively with the people we work with.

Depending on how you engage with us, this may include:

- your name
- email address
- telephone number

- postal address
- date of birth
- emergency contact details
- equal opportunities information (where you choose to provide it)
- photographs, videos or audio recordings (where appropriate consent has been given)
- project participation records
- correspondence you send us
- information submitted through forms on our website
- technical information such as IP addresses, cookies and website analytics.

## Website and cookies

When you visit our website, we may collect limited technical information, such as your IP address, browser type, device information and website usage data through cookies or similar technologies. This helps us understand how our website is used, improve accessibility and performance, and ensure our website functions effectively.

You can manage your cookie preferences through your browser settings or our website's cookie banner. Please see our Cookie Policy for more information.

## Why we collect it

We use personal information to:

- deliver projects, programmes and events
- communicate with participants, partners and stakeholders
- respond to enquiries
- process registrations and applications
- safeguard children, young people and adults where required
- meet contractual, legal and regulatory obligations
- improve our services and website
- send relevant updates where consent has been given.

## 6. How we protect information

Participation People uses appropriate organisational and technical measures to safeguard personal information.

These include:

- secure digital systems
- encrypted and password-protected storage
- appropriate access controls
- staff training and awareness
- secure information sharing processes
- regular review of our information security arrangements.

Access to personal information is limited to those who need it to carry out their role.

## 7. Sharing personal information

We only share personal information where there is a lawful basis for doing so.

Information may be shared:

- with trusted partners delivering services on our behalf
- where required by contract with commissioners or funders
- where required by law
- where necessary to safeguard a child, young person or adult at risk
- with an individual's consent where appropriate.

Whenever information is shared, we seek to ensure it is transferred securely and only the minimum necessary information is disclosed.

We never sell personal information or data.

## 8. Individual rights

Everyone whose personal information is processed by Participation People has rights under UK data protection legislation.

These include the right to:

- be informed about how their information is used
- access their personal information
- request correction of inaccurate information
- request deletion of information where applicable
- restrict or object to certain types of processing
- withdraw consent where processing relies on consent
- complain to the Information Commissioner's Office (ICO).

Where we rely on your consent to process personal information, you have the right to withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before consent was withdrawn.

To exercise any of your data protection rights, withdraw your consent, or ask questions about how we process your personal information, please contact us at **informationrequests@participationpeople.com**.

We are committed to responding to requests promptly and in accordance with legal requirements.

## 9. Data breaches

Participation People takes all actual or suspected personal data breaches seriously.

Where a breach occurs, we will:

- assess the risks promptly
- take appropriate action to contain the incident
- investigate the cause
- notify the Information Commissioner's Office where legally required
- inform affected individuals where there is a high risk to their rights and freedoms
- review our practices to reduce the likelihood of future incidents.

## **10. Information governance**

Good information governance is everyone's responsibility.

Participation People promotes a culture where information is handled responsibly, securely and ethically.

We regularly review our systems, policies and procedures to ensure they remain effective, proportionate and aligned with current legislation and best practice.

## **11. Roles and responsibility**

Everyone working on behalf of Participation People is responsible for protecting personal information and complying with this policy.

Our leadership team oversees our approach to information governance and ensures appropriate systems, training and resources are in place to support compliance.

Questions about this policy or requests relating to personal information can be directed to our Data Protection Officer using the contact details provided on our website.

## **12. Relevant legislation**

This policy operates alongside relevant legislation and guidance, including:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Freedom of Information Act 2000 (where applicable)
- Human Rights Act 1998
- Information Commissioner's Office (ICO) guidance.

This policy should also be read alongside Participation People's Privacy Notices, Safeguarding Policy and Artificial Intelligence Policy.

Participation People also publishes audience-specific Privacy Notices to explain how we collect and use personal information for particular groups, including children and young people. These notices should be read alongside this policy.

### **13. Review**

This policy will be reviewed annually, or sooner where legislation, regulatory guidance or organisational practice changes.