

Youth Charter Confidentiality and Data Protection Policy

The Youth Charter is committed to providing a safe environment for young people, volunteers and workers. Youth Charter recognises that trust is essential for good youth work and is the foundation for all relationships within (organisation). Maintaining confidences is an integral part of building trust between young people, volunteers and the organisation and will be respected at all times, apart from where it conflicts with reporting child protection concerns.

In addition, the Youth Charter implement's the seven key principles of the General Data Protection Regulation (GDPR).

The Youth Charter therefore states:

Young People

- The Youth Charter is committed to ensuring that young people are able to share information with youth workers in a confidential manner.
- Young people can expect that any information they give to a worker is treated as sensitive and confidential and will not be shared UNLESS:
 - The worker believes that the young person, or another young person, is in danger or is being harmed. In this case the young person will be told that the information has to be shared with the appropriate agencies and encouraged to agree with this.
 - The young person discloses that they are involved, or plan to become involved in acts of terrorism.

Workers

- All workers at the Youth Charter are expected to uphold the organisations commitment to confidentiality. This means that staff and volunteers are expected to:
 - Keep records, files and documents stored in a safe and secure manner
 - Not discuss any information given by a young person in confidence, unless they have a child protection concern or the young person gives their permission
 - Tell a young person when information cannot be kept confidential (ie. a child protection concern)
 - Encourage a young person to talk to other people (e.g. parents or guardians) or professionals where they feel it would be in the young person's interest
- Workers can expect that the organisation will:
 - Provide them with a suitable means for storing confidential documents
 - Ensure that their own information (e.g. medical or emergency contact information, information contained in their PVG Scheme Record) is stored securely, is kept confidential and only seen by colleagues in relation to their role
 - Safely destroy personal information when the worker ceases to work for the organisation
 - Take disciplinary action where the Confidentiality Policy is not upheld (unless due to child protection concerns or a court order has been issued)

Parents/Guardians

- Parents/Guardians of young people attending (organisation/club) can expect that the information they provide (e.g. medical information, contact information) will:
 - Be kept in a secure, confidential manner and only used for the purpose provided (i.e. to safeguard the health and wellbeing of the young person)

- Enable the club to ensure that parents receive information from the club that is necessary e.g. newsletters, letters and emails regarding information about upcoming events, fundraising activities, and club activities.
- Not be sold
- Will not shown to organisations without prior consent.

General Data Protection Regulation (GDPR)

Definitions

Charity	YOUTH CHARTER FOR SPORT Registered charity 1065861
GDPR	General Data Protection Regulation
Responsible Person	Geoff Thompson MBE FRSA DL, Executive Chair
Register of Systems	register of all systems or contexts in which personal data is processed by the Charity

The GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

1. Data Protection Principles

The GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

Article 5(1) requires that personal data shall 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 that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to

implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General Provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner’s Office as an organisation that processes personal data. (??)

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Data we may hold and the reason for holding it are outlined in the following table:

Data we (may) hold	Why we need it
Name	To identify a unique account holder and to check for duplicate accounts
Email & Telephone	So we can contact you if we need to discuss your account
Organisation details	To identify a unique organisation and check if it has already been registered
Username & Password	Unique login identity so we know who logged in Our Cookies are set at the login Your password is stored in a one way encrypted form which means only you know what it is An encrypted password cannot be recovered is forgotten

Date of Birth	Young People only to used anonymously for participation data
Parent details	Young People under the age of 16 years are required by GDPR to have parental consent to use online services that collect data
Session data	We record each time you login so we can record user frequency which we use to study user online behaviour
Download preferences	Show us what users prefer in terms of content so we can develop further resources
Expression of Interest	This is used to develop proposals to your needs or to respond to an enquiry. Collating this information from various requests helps us to shape our future products and services.
Terms & Conditions Checkbox	Record when and where you agreed to our Terms and Conditions
Privacy Policy Checkbox	Positive consent to our Privacy policy
Cookie consent	Positive consent to our use of cookies

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving/removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).