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		Date of issue	21/06/2026	Date for next review	21/06/2027
Title		Data Protection Policy			
Approved by		Jackie Pugh, Kate Peake (Directors)			

Data Protection Policy

1. Introduction

Free Cakes for Kids Limited is committed to protecting the privacy, confidentiality and security of the personal information entrusted to us by volunteers, donors, referring organisations, families and children who receive support through our service.

Free Cakes for Kids Limited acts as a Data Controller under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This means we determine the purposes and means of processing personal data and are responsible for ensuring that personal information is handled lawfully, fairly and transparently.

We collect and process personal information to:

- Match volunteers with local groups..
- Communicate with referring organisations and partner agencies.
- Manage volunteers, supporters and donors.
- Administer and improve our services.
- Meet our safeguarding, legal, financial and regulatory obligations.

We are committed to ensuring that personal information is:

- Processed lawfully, fairly and transparently.
- Collected only for specified and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date where appropriate.
- Stored securely and protected from unauthorised access.

- Retained only for as long as necessary.
- Disposed of securely when no longer required.

This policy applies to all directors, volunteers, contractors and anyone acting on behalf of Free Cakes for Kids Limited who handles personal information.

Free Cakes for Kids Limited is committed to the principles of privacy by design and by default, ensuring that data protection considerations are embedded into our activities and decision-making processes.

Anyone who believes this policy has not been followed in relation to their personal data should contact the Data Protection Officer.

Data Protection Officer:

Jackie Pugh
Group Coordinator
Free Cakes for Kids Limited

2. Data We May Hold

We only collect personal information that is necessary to deliver our services and operate the organisation effectively.

We may process personal information relating to:

- Volunteers.
- Referring organisations and professionals.
- Donors and supporters.
- Individuals making enquiries.

This may include:

- Name.
- Email address.
- Telephone number.
- Organisation name and contact details.
- Records of communications and correspondence.
- Safeguarding information where necessary.

Where safeguarding concerns arise, we may process special category personal data or other sensitive information where permitted by law and necessary to protect a child's welfare.

3. Lawful Basis for Processing

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

- Legitimate Interests – to coordinate volunteers, manage referrals and deliver cakes to children.
- Consent – where individuals voluntarily provide information or request contact from a local group.
- Legal Obligation – where we are required to comply with legal, safeguarding, financial or regulatory requirements.
- Vital Interests – where processing is necessary to protect an individual's safety or wellbeing.

Where consent is relied upon, individuals may withdraw their consent at any time. Withdrawal of consent will not affect processing carried out before consent was withdrawn.

4. Data Retention and Deletion

General Rule: Personal data and contact details are retained whilst volunteers and referring agencies are actively involved with the group.

Contacts are deleted if they have not been actively involved with the group in the previous 12 months, for example:

- No volunteering activity
- No communication relating to the organisation
- A volunteer asks for their data to be deleted

Emails will be retained for up to 12 months.

Volunteers will be asked every 12 months if they wish to remain an active member. Details will be deleted if:

- The volunteer asks to be removed from the list
- The volunteer doesn't respond but has not been active for a period of time

Exceptions: Data and emails may be retained longer if necessary for:

- Safeguarding matters
- Complaints or disputes
- Legal obligations
- Financial records or donations
- Insurance requirements
- An individual asks to be kept on our list despite not currently being an active member. This status will be reviewed every 12 months or until the individual asks to be removed.

Emails and contacts will be deleted manually.

Data will be deleted securely when it is no longer required.

5. Individual Rights

Individuals have the right to:

- Access personal information we hold about them
- Correct inaccurate information
- Request deletion where appropriate
- Restrict processing
- Object to certain processing activities

Requests should be made in writing to the Data Protection Officer.
Subject Access Requests will be responded to within one month.

6. Responsibilities of Volunteers

Volunteers must:

- Handle personal information responsibly
- Access data only when necessary
- Not share data with unauthorised individuals
- Keep data secure
- Report data breaches or loss immediately to the Data Protection Officer

Volunteers must report any suspected data breach, loss of information, or unauthorised disclosure as soon as possible and within 24 hours of becoming aware of the issue.

Volunteers must treat all information relating to families, referrals, and other volunteers as confidential and must not share this information outside the organisation unless authorised.

Failure to comply may result in the volunteer being unable to continue with the organisation.

7. Responsibilities of Referring Organisations

Referring organisations must:

- Ensure information provided is accurate
- Inform Free Cakes for Kids Limited of any changes to delivery or contact information

The organisation is not responsible for inaccuracies in information supplied by referrers.

8. Data Security

We take reasonable steps to keep data secure, including:

- Limiting access to authorised volunteers

- Password-protecting systems and documents
- Secure storage of digital and paper records
- Secure deletion when data is no longer needed

9. Use of Portable Devices

Volunteers using laptops, tablets, phones, or other portable devices must ensure:

- Devices are password protected
- Devices are not left unattended in public
- Data is processed privately
- Data is deleted when no longer required

Loss or theft of devices containing personal data must be reported immediately to the Data Protection Officer.

10. Disclosure of Information

Personal information will only be shared where necessary and appropriate, including:

- Where consent has been provided.
- Where there is a safeguarding concern.
- Where disclosure is required by law.

Individuals requesting that their details be passed to a local Free Cakes for Kids group will be deemed to have consented to the sharing of relevant contact information for that purpose.

Information will never be sold or shared for marketing purposes.

11. ICO Registration

Free Cakes for Kids Limited will comply with all applicable requirements relating to registration with the Information Commissioner's Office (ICO), including payment of any data protection fees where required by law.

The Board of Directors will review the organisation's data processing activities periodically to ensure ongoing compliance.

12. Privacy Notices

We provide a privacy notice to all individuals whose data we collect, explaining:

- What data is collected
- How it will be used
- How long it will be retained

- Who will see it
- Their rights and how to exercise them
- How to contact the Data Protection Officer

13. Data Retention Schedule

A retention schedule is maintained to ensure all data is deleted or archived securely, including:

Data Type	Retention Period	Reason / Legal Basis
Volunteer contact info	12 months inactivity	Operational management
Emails about cake requests	12 months	Operational
Safeguarding records	25 years / indefinitely	Legal / safeguarding
Financial records	7 years	Legal / HMRC

14. Breach Notification Procedure

In the event of a data breach:

- Report immediately to the Data Protection Officer
- Log the breach and assess impact
- Notify the ICO within 72 hours if there is a risk to individuals' rights
- Inform affected individuals if high risk

15. Disposal of Personal Data

When no longer required, data will be securely:

- Deleted from electronic systems
- Shredded or disposed of as confidential waste

16. Review

This policy will be reviewed annually or sooner if:

- Legislation changes
- Operational practices change
- A data protection incident occurs

17. Linked Policies

- Confidentiality Policy