



Data Protection Policy

Kate's Training CIC

1. Data Protection Policy Statement

We recognise our obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation. We are committed to protecting personal data and will apply the following principles:

- We will process personal data lawfully, fairly and transparently. Processing will take place only where:
 - a) at least one lawful basis for processing personal data applies; and
 - b) where special category data is processed, at least one additional condition for processing special category data also applies.
- Personal data will be collected only for specified, explicit and legitimate purposes and will not be processed further in a manner incompatible with those purposes.
- Personal data will be adequate, relevant and limited to what is necessary for the purposes for which it is processed.
- Personal data will be accurate and, where necessary, kept up to date.
- Personal data will be retained only for as long as necessary. Records relating to regulated training will generally be retained for three years and six months after the training, in accordance with First Aid Awards guidance and legal requirements. Community Support records will generally be retained for 7 years after a person stops using our services. Volunteer records will generally be retained for 12 months after the volunteer leaves the organisation, unless there is a reason to keep them longer, and directors' records will be retained for 10 years after the director leaves. Records relating to safeguarding concerns and mental health will be retained for 20 years. Records relating to accidents or incidents will be retained for periods ranging from 12 months to 10 years; further details are set out in the Health and Safety Policy.
- We will respect and facilitate the rights of individuals under the UK GDPR.
- We will implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- Personal data will be transferred outside the United Kingdom only where the transfer complies with applicable data protection law and appropriate safeguards are in place.

2. Lawful Bases for Processing Personal Data

Unless an exemption applies, we will identify and document at least one lawful basis before processing personal data. The lawful bases that may apply include:

- **Consent:** the individual has clearly consented to the processing of their personal data for a specific purpose.
- **Contract:** processing is necessary for a contract with the individual or to take steps at their request before entering into a contract.
- **Legal obligation:** processing is necessary to comply with a legal obligation, excluding contractual obligations. **Vital interests:** processing is necessary to protect someone's life. This basis is generally relevant only in urgent circumstances, such as sharing medical information with a hospital treating a person after a serious accident.



- **Public task:** processing is necessary to perform a task in the public interest or to exercise official functions that have a clear basis in law.
- **Legitimate interests:** processing is necessary for our legitimate interests or those of a third party, except where those interests are overridden by the individual's interests, rights or freedoms.

3. Conditions for Processing Special Category Data

Before processing special category data, we will identify and document both an Article 6 lawful basis and an Article 9 condition. Where required, we will also satisfy the relevant conditions and safeguards under the Data Protection Act 2018. The conditions that may apply include:

- a. the individual has given explicit consent to the processing of their special category data;
- b. processing is necessary to meet obligations or exercise rights in the field of employment, social security or social protection law;
- c. processing is necessary to protect the vital interests of:
 - the individual, where they are physically or legally incapable of giving consent; or
 - another person, where that person is physically or legally incapable of giving consent;
- d. processing is carried out by a not-for-profit body with appropriate safeguards and relates only to members, former members or people who have regular contact with it in connection with its purposes, without disclosure outside that body unless the individual consents;
- e. the individual has manifestly made the information public, or processing is necessary to establish, exercise or defend legal claims or for judicial functions;
- f. processing is necessary for reasons of substantial public interest, on the basis of law and with appropriate safeguards;
- g. processing is necessary for preventive or occupational medicine, medical diagnosis, the provision of health or social care, or the management of health or social care systems, subject to applicable confidentiality obligations;
- h. processing is necessary for reasons of public interest in the area of public health, with appropriate safeguards; or
- i. processing is necessary for archiving in the public interest, scientific or historical research, or statistical purposes, with appropriate safeguards.

4. Policy Administration and Contact Details

Questions about this policy or the way we handle personal data should be directed to the Data Protection Officer and policy owner, Kate Gorski, by email at kate@katestraining.uk or by telephone on 07362 512257 or 0161 706 2276.

This policy should be read alongside our other organisational policies. It will be reviewed at least every 12 months and sooner where changes in legislation, guidance or organisational practice require it.

Policy owned and approved by	Board of Directors at Kate's Training CIC
Policy team	K. Gorski, K. Metcalfe, D. Gorski, E. Adelakun
Main contact	Kate Gorski, kate@katestraining.uk , 01617062276, 07362512257
Effective date	1 st September 2026
Next review	1 st September 2027, or as and when required
Applies to	Directors, Employees, Workers, Volunteers, Trainers, Contractors