

Confidentiality and Data Protection Policy and Procedures

Last Updated: February 2026

Purpose

Kids is a charity that works with a range of disabled children, young people and families. Collecting and processing sensitive and other personal data and confidential information is fundamental to providing our services. We apply a privacy-by-design model to all personally identifiable data.

This is in order to:

- meet legislative requirements
- protect people that use our services from harm and to provide them with an effective service
- protect the personal data of our supporters and of our employees, sessionals and volunteers
- ensure that personal data processed by Kids is accurate and up to date
- implement guidance on contacting people electronically for direct marketing purposes.

This policy aims to protect the privacy and confidentiality of all personal information related to the children, families, employees, and volunteers associated with our organisation

Scope

This policy is available to anyone whose personal data we process or may process. It must be implemented by

- Trustees,
- All employees (permanent, casual and sessional),
- All volunteers,
- All contractors and sub-contractors.

Definition of Confidential Information

Confidential information includes, but is not limited to:

- Personal details of children and their families (names, addresses, email address, medical records)
- Employee, sessional and volunteer information
- Financial records

- Sensitive data that could identify individuals or compromise privacy.

Responsibilities

All employees and volunteers are responsible for ensuring that confidential information is handled, stored and shared appropriately, complying with this policy and reporting any breaches.

Data Protection Compliance

Kids charity complies with the UK Data Protection Act 2018 and UK GDPR. We ensure personal data is::

- Processed lawfully, fairly, transparently,
- Collected for specified purposes,
- Is adequate, relevant,
- Accurate, up to date,
- stored securely.

Lawful Basis for Processing

We rely on lawful bases under Article 6 UK GDPR including Consent, Contract, Legal Obligation, Vital Interests, and Legitimate Interests. For Special Category Data, we rely on Article 9 conditions including Explicit Consent, vital Interests, Health/Social Care, Safeguarding and Substantial Public Interest.

Consent

Consent must be obtained from a parent or legal guardian for children's data. Individuals must be informed about how their data is used before collecting storing or sharing any personal data.

Consent may be withdrawn at any time.

Breach of Confidentiality

In the event of a confidentiality breach:

- Any Breach must be reported immediately to the DPO at DPO@kids.org.uk
- Colleagues must read and follow the Data Breach Policy
- Investigate the breach and complete the Serious Incident requiring investigation (SIRI) form.
- Notify affected individuals and relevant authorities as required by law.
- Review and update any security measures to prevent future breaches.

Training and Awareness

Mandatory training is required for all employees and volunteers on joining Kids and must be refreshed annually thereafter.

Data Subject Rights

Individuals have rights to be informed, access data, rectification, erasure, restriction, objection, data portability, and rights connected to automated decisions. Any requests must be submitted to the DPO.

Data Retention and Secure Deletion

Data is kept only as long as necessary, according to our retention schedule, and securely deleted afterwards.

Security Measures

Security measures include access controls, encryption, password and MFA requirements, secure storage for paper files, and secure device and data transfer protocols.

Data Sharing and Third Parties

We share data only when lawful and necessary. Third-party processors must have Data Processing Agreements ensuring GDPR compliance.

International Data Transfers

Transfers outside the UK require adequacy decisions or appropriate safeguards, including Standard Contractual Clauses.

Data Protection Impact Assessments (DPIAs)

DPIAs are undertaken for high-risk processing including children's data, health data and new technologies.

Limits to Confidentiality

Confidentiality may be overridden where there is safeguarding risk, risk of serious harm, crime, terrorism reporting obligations or court/legal requirements.

Policy Governance and Review

This policy is owned by the COO, approved by the Board of Trustees. Kids is registered with the ICO (number Z8457417) as a data controller.

Review and Updates

This policy will be reviewed annually and updated as necessary to ensure it remains effective and compliant with current laws and best practices.