

GDPR Data Protection Policy – Ochil Youths Community Improvement (OYCI)

1. Introduction

OYCI is committed to protecting the privacy and personal data of all individuals whose data it collects and processes. This policy outlines how OYCI complies with the UK General Data Protection Regulation (UK-GDPR).

2. Organisational Identity

Legal Name: Ochil Youths Community Improvement

Registered Address: Ben Cleuch Centre, Park Street, Tillicoultry, FK13 6AG

Legal Structure: Registered Charity

Data Protection Contact: Shona Ulrichsen – Chief Officer

3. Data Controller and Data Processors

The Board of Trustees acts as the Data Controller for OYCI. There are currently no designated Data Processors. Data processing is supported by cloud-based services including Bookeo (booking system), Mailchimp (communications), and Microsoft Teams.

4. Types of Personal Data Collected

OYCI collects personal data including names, contact information, school details, medical information, consent forms, and photographs. Special category data such as health information is collected to support the needs of children and young people. OYCI applies the principle of data minimisation by ensuring that only data which is adequate, relevant, and limited to what is necessary is collected. Data collection forms are regularly reviewed to remove unnecessary fields, and staff are trained to avoid collecting excessive or irrelevant information.

5. Purpose Limitation

OYCI collects and processes personal data only for specific, explicit, and legitimate purposes. These include managing bookings and participation in youth activities, communicating with young people and their parents or guardians, ensuring the health, safety, and wellbeing of participants, meeting legal and safeguarding obligations, reporting to funders and partners (in anonymised or aggregated form where possible), and promoting OYCI's work, with consent, through photographs and testimonials. Personal data is not further processed in a manner that is incompatible with these purposes. If new purposes arise, individuals will be informed and, where required, consent will be obtained.

6. Lawful Basis for Processing

OYCI relies primarily on consent as the lawful basis for processing personal data. Consent forms are used for communications and participation in activities.

7. Data Subjects

OYCI collects and processes data for the following groups:

Young people and parents – approximately 400 individuals

Staff – approximately 20 individuals

8. Data Storage and Security

Personal data is stored in cloud-based systems including Bookeo, Mailchimp, and Teams. Security measures include password protection. Personal devices are used for data processing.

9. Data Retention

OYCI retains personal data for up to 2 years for dormant customers. All customers are asked to review their data annually. A data cleansing process is conducted every three months to identify and delete dormant records.

10. Individual Rights

OYCI informs individuals of their rights through privacy notices. While there is currently no formal process for handling subject access requests, individuals may contact the Chief Officer to exercise their rights.

11. Third Parties

OYCI may share personal data with schools when necessary, such as for processing awards. It is recommended that data processing agreements be established with these third parties. Where relevant, and if there exists a conflict, Child Protection legislation and policy supersedes GDPR.

12. Data Breaches

OYCI is setting up a Google Form to document data breaches. Shona Ulrichsen is responsible for reporting breaches to the Information Commissioner's Office (ICO).

13. Privacy Notices

OYCI provides privacy notices at the time data is collected. These notices are available via forms and the organisation's website. The notices include information about regular data cleansing and the handling of photographs, which are stored securely and used only with consent.