

GDPR POLICY

FOR COLLECTING AND HANDLING INFORMATION

Promoting Wellbeing for All



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POLICY REVIEW

This policy will be reviewed annually or sooner if there are changes in legislation or organisational structure.

**UPDATED:
DECEMBER 2024**



POLICY STATEMENT

This policy outlines how Pausa Life complies with the General Data Protection Regulation (GDPR) when collecting, storing, and processing information about young people and vulnerable adults. It ensures the safeguarding of personal data and the involvement of parents, guardians, or authorised representatives where required.

SCOPE

This policy applies to all employees, volunteers, and representatives of Pausa Life who handle the personal data of individuals under the age of 18 and vulnerable adults.



|| Pausa Life

7 KEY PRINCIPLES



1

LAWFULNESS, FAIRNESS, & TRANSPARENCY

- Data will be collected and processed lawfully, fairly, and transparently.
- Information will be provided in clear and plain language suitable for young people, vulnerable adults, and their parents, guardians, or authorised representatives.

2

PURPOSE LIMITATION

- Data will only be collected for specified, explicit, and legitimate purposes.
- Any further processing will be consistent with these purposes unless consent is obtained.

3

DATA MINIMISATION

- Only the data necessary for the intended purpose will be collected and processed.

4

ACCURACY

- Data will be accurate and kept up to date. Inaccurate data will be corrected or deleted promptly.

7 KEY PRINCIPLES



5

STORAGE LIMITATION

- Data will be retained only for as long as necessary to fulfil the purpose of collection.
- Retention periods will comply with legal and organisational requirements.

6

INTEGRITY AND CONFIDENTIALITY

- Data will be processed securely to protect against unauthorised access, loss, or damage.

7

DATA MINIMISATION

- Pausa Life will demonstrate compliance with GDPR through documentation and audits.

CONSENT AND PERMISSION

When processing data about individuals under the age of 18 or vulnerable adults, Pausa Life will:

OBTAIN CONSENT

Obtain explicit consent from a parent or guardian for children under the age of 13.

For young people aged 13-17, consent will be sought from the young person, with parental or guardian consent obtained where legally required or appropriate.

For vulnerable adults, consent will be obtained from the individual or, where appropriate, their authorised representative.

PROVIDE CLEAR EXPLANATIONS

Ensure young people and vulnerable adults understand how their data will be used.

Provide clear explanations to parents, guardians, or authorised representatives about the purpose and necessity of the data collection.

NORMALISATION OF DATA

Unless explicit permission is given, all data used for reporting, analysis, or publication will be anonymised to protect individuals' identities.





DATA COLLECTION & USE

TYPES OF DATA COLLECTED



- Contact information (e.g., name, address, phone number)
- Health or medical details (if relevant to activities or services)
- Emergency contact details
- Responses to questionnaires and follow-up information if permission is given.

PURPOSE OF DATA COLLECTION



- To deliver services or activities
- To ensure the safety and wellbeing of participants
- To gather feedback through questionnaires and conduct follow-ups with appropriate permissions
- To comply with legal obligations (e.g., safeguarding requirements)

DATA PROTECTION MEASURES

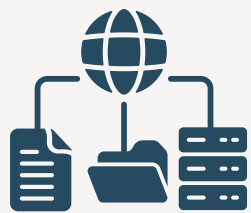


STORAGE AND SECURITY



- Data will be stored securely, using password-protected systems such as HubSpot and locked storage for physical records.
- Access will be restricted to authorised personnel only.

DATA SHARING



- Data will not be shared with third parties without explicit consent unless required by law or for safeguarding purposes.

DATA BREACH RESPONSE



- Any data breaches will be reported to the Data Protection Officer immediately and, if necessary, to the Information Commissioner's Office (ICO) within 72 hours.

DESIGNATED SAFEGAURDING TEAM

ESTA BORDONI & ADAM BATES

Data Protection Officers

Phone: 07396 799 318

Email: esta.bordoni@pausa.life



Rights of Young People, Vulnerable Adults, and Their Representatives Under GDPR, young people, vulnerable adults, and their parents, guardians, or authorised representatives have the following rights:

1. Access

- To request access to the data held about them.

2. Rectification

- To request corrections to inaccurate or incomplete data.

3. Erasure

- To request the deletion of data where appropriate.

4. Objection

- To object to data processing for specific purposes.

5. Data Portability

- To request transfer of data to another organisation in a structured format.

Requests can be made in writing to the Data Protection Officers at Phone: 07396 799 318, Email: esta.bordoni@pausa.life.

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CONTACT INFORMATION :

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Phone: 07396 799 318

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