

Xpact Data Protection and Privacy Policy

1. Introduction

Xpact is committed to protecting the privacy and personal data of all individuals we work with, including children, young people, adults at risk, parents/carers, mentors, staff, and contractors. We comply fully with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy sets out how we collect, store, use, and share personal information in a safe, lawful, and transparent way.

2. Who This Policy Applies To

This policy applies to:

- Children and young people receiving mentoring services
- Parents and carers of those under 18
- Staff, mentors, volunteers, and contractors
- Visitors to our website
- Partner organisations or referrers (e.g., schools or youth services)

3. What Data We Collect

We may collect and process the following types of personal data:

a. For Children and Young People:

- Full name and date of birth
- Contact details (if appropriate)
- Parent/carer contact information
- Medical or support needs (if shared voluntarily or required for safeguarding)
- Session logs, progress notes, and mentor feedback
- Consent forms and media permissions
- IP address and online identifiers (when using our platforms)

b. For Parents/Carers:

- Full name and contact details
- Relationship to the child
- Consent records
- Communication history

c. For Mentors, Staff and Contractors:

- Name, contact information, DBS status
- Employment history and qualifications
- Safeguarding declarations and training records
- Session attendance logs
- Online accounts (e.g., platform usernames if required for mentoring)

4. Lawful Basis for Processing

We only collect and use personal data where we have a lawful basis to do so, including:

- Consent – For example, where we seek permission to contact a child or share media
- Contractual necessity – To manage mentor agreements and deliver services
- Legal obligation – To comply with safeguarding and DBS requirements
- Vital interests – To protect a child or adult at risk in an emergency
- Legitimate interests – For internal evaluation, training, or service improvement (always balanced against individual rights)

We process special category data (e.g., health, ethnicity) only when strictly necessary and with additional safeguards.

5. How We Use Personal Data

We use data for the following purposes:

- To deliver safe and effective mentoring services
- To contact parents/carers in emergencies or for routine updates

- To manage staff and mentor onboarding, training, and supervision
- To fulfil legal and safeguarding obligations
- To improve our services and training
- To maintain accurate records of interactions, concerns, or progress

We do not use personal data for marketing unless we have explicit consent.

6. How We Store and Protect Data

We take data security seriously. We store personal information:

- On secure, encrypted cloud-based systems
- With access restricted to only those who need it
- With password-protected devices and two-factor authentication
- In compliance with UK GDPR data minimisation and retention standards

We never store unnecessary data and review records regularly to ensure accuracy and relevance.

7. Data Retention

We retain data only as long as necessary for the purpose it was collected. For example:

Data Type	Retention Period
Child and session records	6 years after service ends
Staff/mentor records	6 years after contract ends
Safeguarding records	25 years or in line with legal guidance
Consent forms	Duration of service + 1 year
Financial records	7 years (for tax/audit purposes)

At the end of the retention period, data is securely deleted or anonymised.

8. Data Sharing

We only share personal data when:

- There is a safeguarding concern or legal obligation (e.g., police, social services)
- We have explicit consent to share it
- It's necessary to deliver our services (e.g., using a third-party platform like Zoom or Minecraft)
- We work with partner agencies (e.g., schools) under agreed data-sharing terms

We do not sell or trade any personal information.

9. Use of Third-Party Platforms

Where we use platforms such as:

- Online gaming tools (e.g., Minecraft, Roblox)
- Communication platforms (e.g., Discord, Zoom)
- Cloud-based services (e.g., Google Workspace, Notion, Microsoft 365)

We ensure:

- All platforms meet industry-standard security requirements
- Access is restricted and monitored
- Children are never required to use unsafe or unmoderated tools
- No personal data is unnecessarily shared within these platforms

A separate Online Safety Policy governs safe platform use and moderation.

10. Your Rights (Data Subjects)

Under UK GDPR, individuals (or parents/carers acting on behalf of children) have the right to:

- Access their personal data ("Subject Access Request")

- Request correction of inaccurate data
- Request deletion (in certain circumstances)
- Restrict or object to processing
- Withdraw consent at any time (where applicable)
- Complain to the Information Commissioner's Office (ICO)

11. Data Breaches

If a data breach occurs that poses a risk to rights and freedoms, we will:

- Notify affected individuals as soon as possible
- Report to the ICO within 72 hours if required
- Document all breaches and outcomes

12. Policy Review and Updates

We review this policy annually or following:

- Changes in data protection law
- Introduction of new technologies or platforms
- Changes in organisational structure or services

Last Reviewed: October 2025

Next Review Due: October 2026

13. Contact Us

If you have any questions or concerns about this policy or your data, please contact:

Xpact Data Protection Lead: H Starton

Contact: Info@xpactforimpact.co.uk