



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

Data Protection Policy

Last updated	8 th January 2026
--------------	------------------------------

Definitions

Charity	Bromley Family Link
GDPR	General Data Protection Regulation.
Responsible Person	Rebecca Owlett
Register of Systems	Means a register of all systems or contexts in which personal data is processed by the Charity.

Introduction

Family Link is committed to protecting the privacy and personal data of all children, young people, parents and carers, staff, volunteers, trustees, supporters, donors, and partners.

We recognise our responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and are committed to handling personal data lawfully, fairly, transparently, and securely.

This policy explains how Family Link collects, uses, stores, shares, and protects personal data.

Family Link also monitors changes to UK data protection law, including the Data Use and Access Act 2025, and updates its policies and practices accordingly.



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

Scope of this Policy

This policy applies to:

- All Family Link staff, volunteers, trustees, interns, and contractors
- All families, children and young people using Family Link services
- All supporters, donors, applicants, and website users
- All personal data processed by Family Link, whether held electronically, on paper, or in any other format

Controller and Contact Details

Family Link is the data controller for the personal data it processes.

Full legal name: Family Link

Registered charity number: 801156

Data Protection Lead: Rebecca Owlett

Email: askfamilylink@gmail.com

Postal address: 46 Homemead Road, Bromley, BR2 8BA

Telephone: 07368 975310

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection (www.ico.org.uk). We would, however, appreciate the opportunity to address your concerns before you contact the ICO.

Lawful Bases for Processing

Family Link will only process personal data where there is a lawful basis under UK GDPR.

These include:

- Consent
- Performance of a contract
- Compliance with a legal obligation



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

- Vital interests (including safeguarding)
- Public task
- Legitimate interests (including safeguarding, crime prevention, and service delivery)

Where consent is used, it will be freely given, informed, and capable of being withdrawn at any time.

The Data We Collect

Personal data means any information relating to an identified or identifiable individual.

Family Link may collect, use, store, and share the following categories of personal data, depending on your relationship with us:

Supporters, Donors, and Enquirers

- Name, address, email address, and telephone number
- Records of enquiries and communications
- Records of events attended or campaigns supported
- Gift Aid status (UK taxpayer confirmation)
- Donation and payment information (processed securely; card details are not retained)

Families, Children, and Young People

- Names, dates of birth, gender, and contact details
- Parent, guardian, or legal representative details
- Medical, disability, and additional needs information (where necessary)
- Safeguarding and welfare records
- Photographs and videos (with appropriate consent)



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

Applicants, Staff, Volunteers, and Trustees

- Contact details and date of birth
- Qualifications, experience, and suitability for roles
- References and referee details
- DBS and safeguarding information where required
- Emergency contact information
- Equality and diversity monitoring information (anonymised where possible)

Special Category Data

Family Link may process special category data, such as health or disability information, where this is necessary for:

- Providing safe and appropriate services
- Safeguarding children and vulnerable individuals
- Meeting legal or regulatory obligations

Such data is handled with additional care and security. Where required, explicit consent will be obtained unless another lawful basis applies.

How We Use Personal Data

Family Link uses personal data to:

- Deliver services, activities, and support
- Safeguard children and young people
- Communicate with families, staff, volunteers, and supporters
- Manage recruitment, volunteering, and employment
- Fundraise and manage donations



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

- Comply with legal, regulatory, and safeguarding obligations
- Improve our services and activities

Data Sharing

Family Link will only share personal data where it is lawful and necessary. This may include sharing with:

- Local authorities, social services, police, and safeguarding partners
- Healthcare or education professionals where appropriate
- Service providers acting on our instructions

We do not share sensitive personal data without consent unless there is a legal or safeguarding obligation to do so.

Children's Data

Family Link works directly with children and young people and takes additional care when processing their data.

- Children under the age of 13 require parental or guardian consent before their data is collected or processed
- We only collect information that is necessary
- We always prioritise safeguarding at all times
- We use clear, age-appropriate information where possible

Data Protection Principles

Family Link processes personal data in accordance with the UK GDPR principles. Personal data must be:

1. Processed lawfully, fairly, and transparently



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Kept for no longer than necessary
6. Processed securely, ensuring integrity and confidentiality
7. Accountable

Data Security

Family Link has appropriate technical and organisational measures in place, including:

- Secure storage of paper records
- Password-protected systems and devices
- Role-based access controls
- Regular data protection training
- Procedures for reporting and managing data breaches

Any actual or suspected data breach must be reported immediately and will be notified to the ICO within 72 hours where legally required.

Data Retention

Personal data is retained only for as long as necessary for the purposes it was collected, in line with our retention schedule and legal requirements.

Individual Rights

Under data protection law, individuals have the right to:

- Be informed about how their data is used



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

- Access their personal data
- Have inaccurate data corrected
- Request erasure of data (where applicable)
- Restrict or object to processing
- Data portability (where applicable)
- Withdraw consent at any time

Requests should be made in writing and will normally be responded to within one month.

Marketing and Opt-Out

You may opt out of receiving communications from Family Link at any time by using the unsubscribe links in our communications or by contacting us directly.

Website, Cookies, and Third-Party Links

Please see our Cookie Policy for details of information collected through our website. Family Link is not responsible for the privacy practices of third-party websites.

Responsibilities

- The Board of Trustees has overall responsibility for data protection compliance
- Staff and volunteers must follow this policy and report concerns
- Appropriate data protection training is provided

Review of this Policy

This policy will be reviewed at least annually or sooner if there are changes to legislation or Family Link's activities.



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

Policy approved and adopted by the Family Link Board of Trustees

On the: 29 April 2015

Reviewed: 8th January 2026 by Trustee – Paula Hollywood

Current Play Leaders – Kenzie / Megan / Renée / Emma

Current Safeguarding Trustee – Julia James – 07894 672019

Policy due for review: 8th January 2027