Investing in Children

Privacy Policy

Organisational Policy | Investing in Children CIO

Organisation	Investing in Children CIO
Registered Charity	1213379
Registered Office	The Sjovoll Centre, Front Street, Framwellgate Moor, Durham DH1 5BL
Contact	info@investinginchildren.net	0191 307 7030
Reviewed by	Helen Mulhearn, Co-Director
Review date	May 2026
Next review	May 2027

Investing in Children CIO is committed to protecting the privacy and personal data of the individuals we work with — including children and young people, parents and guardians, staff, volunteers, trustees, partners and supporters. This policy explains how we collect, use, protect and share personal data, and sets out the rights of individuals in relation to their information.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025 (DUAA), which amended and updated the UK GDPR from 5 February 2026. We also comply with all relevant safeguarding and charity legislation.

1. Our Commitment

Investing in Children works with children and young people to promote their rights and participation in decisions affecting their lives. Because our work often involves children and vulnerable individuals, we take the protection of personal data extremely seriously.

We ensure that personal data is always processed fairly, lawfully and transparently, and that it is kept only for as long as necessary for the purpose for which it was collected.

2. What Personal Data We Collect

We may collect and process the following types of personal data, depending on your relationship with us:

Category	Examples
Contact information	Name, address, email address, telephone number
Personal information	Date of birth, age range, gender, ethnicity (where relevant for monitoring purposes)
Special category data	Health information, disability information, safeguarding-related information. Processed under Article 9(2)(b) UK GDPR (employment and social protection obligations) and/or Article 9(2)(g) (substantial public interest — safeguarding of children and young people). Appropriate safeguards are always in place.
Programme and participation data	Records of participation in projects or events, feedback and evaluation responses, consultation responses, media consent forms
Children and young people	The above, plus parental or guardian contact details to ensure safe participation in activities

3. How We Collect Information

We collect personal information when individuals:

- Participate in projects, events or consultations
- Register for programmes or services
- Contact us directly
- Apply for employment or volunteering
- Work with us as a partner organisation
- Make a donation or support our work
- Use our website

Where children or young people are involved, information may be provided by parents, guardians or responsible professionals.

4. Our Lawful Basis for Processing

The UK GDPR requires us to identify a lawful basis for every purpose for which we process personal data. The table below sets out our purposes and the lawful basis we rely on for each. Where more than one basis may apply, the most relevant is shown.

Purpose	Lawful Basis (Article 6 UK GDPR)	Special Category Basis (Article 9, if applicable)
Delivering participation programmes and services	Consent (Art. 6(1)(a)) or Legitimate interests	—

	(Art. 6(1)(f))	
Safeguarding children and young people	Legal obligation (Art. 6(1)(c)) and/or Vital interests (Art. 6(1)(d))	Substantial public interest — safeguarding (Art. 9(2)(g)); or Recognised legitimate interest — safeguarding condition (Art. 6(1)(ea), DUAA 2025)
Communicating with participants and stakeholders	Legitimate interests (Art. 6(1)(f)) or Consent (Art. 6(1)(a))	—
Managing staff, volunteers and trustees	Contract (Art. 6(1)(b)) and Legal obligation (Art. 6(1)(c))	Employment and social protection obligations (Art. 9(2)(b))
Monitoring and evaluating our work; reporting to funders	Legitimate interests (Art. 6(1)(f))	Substantial public interest — research and statistical purposes (Art. 9(2)(j)), where applicable. Data is anonymised or aggregated wherever possible.
Complying with legal and regulatory obligations	Legal obligation (Art. 6(1)(c))	Legal claims and regulatory requirements (Art. 9(2)(f)), where applicable
Processing donations and financial transactions	Contract (Art. 6(1)(b)) and Legal obligation (Art. 6(1)(c))	—
Media and photography (images of children/young people)	Consent (Art. 6(1)(a))	Explicit consent (Art. 9(2)(a))

Where we rely on legitimate interests as our lawful basis, we have carried out a Legitimate Interests Assessment to ensure our interests do not override the rights and freedoms of the individuals concerned. Where we rely on the Recognised Legitimate Interest (safeguarding) basis introduced by the Data (Use and Access) Act 2025, no balancing test is required but we still ensure processing is necessary and proportionate.

Where we rely on consent, you have the right to withdraw it at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

5. Sharing Personal Data

Investing in Children does not sell personal data.

Information may be shared with:

- Partner organisations delivering projects on our behalf

- Funders — usually anonymised data only
- Local authorities or safeguarding partners where necessary
- Regulators and statutory bodies where required by law
- Trusted service providers who support our systems and operations

Information may also be shared where there is a safeguarding concern involving a child or young person, in accordance with our Safeguarding and Child Protection Policy.

6. Data Security

We take appropriate technical and organisational measures to protect personal data, including:

- Secure IT systems and access controls
- Restricted access to personal data on a need-to-know basis
- Staff training in data protection
- Secure document storage
- Data protection policies and procedures

Only authorised individuals have access to personal data necessary for their role.

7. Data Retention

Personal data is retained only for as long as necessary and in accordance with our legal and regulatory obligations. Typical retention periods are:

Record Type	Retention Period
Programme records	Up to 6 years after the programme ends
Financial records	Minimum 6 years, in line with HMRC requirements
Safeguarding records	Retained in line with current safeguarding guidance — typically until the child reaches age 25, or longer where required
Employment records	Up to 6 years after employment ends

8. Your Rights

Under the UK GDPR, individuals have the following rights in relation to their personal data:

Your Right	What it means
Right of access	You may request a copy of the personal data we hold about you (a Subject Access Request). We will respond

	within one calendar month.
Right to rectification	You may ask us to correct any inaccurate or incomplete personal data we hold.
Right to erasure	You may ask us to delete your personal data where there is no longer a lawful reason for us to hold it.
Right to restrict processing	You may ask us to pause how we use your data while a complaint or query is being resolved.
Right to object	You may object to processing based on legitimate interests or for direct marketing purposes.
Right to data portability	You may request your personal data in a structured, machine-readable format where processing is based on consent or contract.

To exercise any of these rights, please contact us using the details below. We will not charge a fee for handling requests in ordinary circumstances.

9. Complaints

If you have concerns about how your personal data is handled, please contact us in the first instance:

- Email: info@investinginchildren.net
- Post: The Sjovoll Centre, Front Street, Framwellgate Moor, Durham DH1 5BL

You also have the right to complain directly to the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

10. Policy Review

This policy will be reviewed at least annually and updated as necessary to ensure continued compliance with legislation and best practice. This includes monitoring updates to the UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025, and ICO guidance. The current version and review date are shown on this document.

Policy Sign-Off

Reviewed by	Helen Mulhearn, Co-Director
Review date	May 2026

Next review	May 2027

Version	2.1 — Updated May 2026 (lawful basis table added; DUAA 2025 referenced; Article 9 conditions stated)

Date: 14 May 2026