



DATA PROTECTION & GDPR POLICY

Policy owner	Board of Directors
Policy lead	Andrew Ferguson, Founder and Director
Version	1.0
Effective date	24 July 2026
Review date	24 July 2027, or sooner following a material change or incident
Applies to	Directors, workers, volunteers, contractors, participants, visitors and partner organisations

1. Policy Statement

The Joinery Hub Glasgow CIC is committed to handling personal information lawfully, fairly, transparently and securely. We will collect only the information we need, use it for clear and legitimate purposes, keep it accurate where reasonably possible, protect it from unauthorised access or loss, and retain it only for as long as necessary.

This policy supports compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable privacy and information-handling requirements. It should be read alongside the Hub's safeguarding, equality and diversity, health and safety, complaints and records-management arrangements.

2. Purpose

- Collect and use personal information responsibly
- Identify an appropriate lawful basis for processing
- Protect confidential and sensitive information
- Respond to requests from individuals about their personal information
- Manage data sharing, retention, deletion and security incidents
- Ensure everyone handling information on behalf of the Hub understands their responsibilities

3. Scope

This policy applies to personal information held in paper or electronic form and to information handled through email, cloud storage, websites, forms, photographs, attendance records, referral information, workshop records, CCTV where used, and other systems operated for the Hub. It applies to directors, workers, volunteers, contractors and anyone processing personal data on the Hub's behalf.

4. Data Protection Principles

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date where necessary
- Kept for no longer than needed
- Handled securely and protected against unauthorised or unlawful processing, accidental loss, destruction or damage
- Managed in a way that allows the Hub to demonstrate accountability

5. Personal Information We May Hold

- Names, contact details and emergency-contact information
- Dates of birth or age information where relevant to programme eligibility or safeguarding
- Attendance, referral, participation, progression and feedback records
- Information needed to make reasonable adjustments or support safe participation
- Records of training, volunteering, contractor or governance activity
- Photographs, video or testimonials where appropriate permission has been obtained
- Financial and transaction records where required for grants, purchases, donations or services
- Safeguarding, incident, accident or complaint information where necessary

We will avoid collecting excessive information. Where special category data is required, for example health information needed to support safe participation, the Hub will handle it with additional care and ensure an appropriate legal condition applies.

6. Lawful Bases

The Hub will identify an appropriate lawful basis before processing personal data. Depending on the circumstances this may include consent, contractual necessity, compliance with a legal obligation, protection of vital interests, performance of a task in the public interest where applicable, or the Hub's legitimate interests where those interests are not overridden by the rights and freedoms of the individual.

Consent will only be used where it is genuinely optional and can be withdrawn. Where consent is withdrawn, this will not make earlier lawful processing invalid. Safeguarding or legal obligations may require information to be retained or shared without consent.

7. Children, Vulnerable Participants and Safeguarding Information

Information about children, adults at risk and people receiving additional support will be handled carefully, shared only on a need-to-know basis and protected with appropriate access controls. The Hub will not promise absolute confidentiality where there is a safeguarding concern, a serious risk of harm, a legal requirement to disclose information or another overriding lawful basis for sharing.

8. Fair and Transparent Information

Where the Hub collects personal information directly, people will be told in clear language what information is being collected, why it is needed, how it will be used, who it may be shared with, how long it is likely to be retained and how to raise a concern or exercise their rights. This may be provided through forms, notices, emails, programme information or a privacy notice.

9. Information Sharing

Personal information will not be disclosed casually. Information may be shared with referral partners, funders, service providers, professional advisers, insurers, emergency services, social work, Police Scotland or other bodies where there is a lawful and proportionate reason. The Hub will share the minimum information necessary and use secure methods where appropriate.

Where a third-party supplier processes personal data for the Hub, the Hub will take reasonable steps to use reputable providers and ensure appropriate data-protection terms or contractual arrangements are in place.

10. Data Security

- Password protection and appropriate account access controls
- Multi-factor authentication where available and appropriate
- Locking devices and securing paper records when unattended
- Limiting access to people who need the information for their role
- Keeping software and devices reasonably up to date
- Using secure methods when sending confidential information
- Avoiding unnecessary storage of personal data on personal devices or unapproved systems
- Secure disposal of paper and electronic records when no longer required

11. Email, Photographs, Websites and Digital Services

Email addresses and contact lists will be handled carefully and recipients will not be exposed unnecessarily. Group emails containing personal addresses should normally use BCC where recipients do not need to see one another's addresses.

Photographs, video and participant stories will only be used where there is an appropriate lawful basis and clear permission where required. The Hub will be especially cautious about images or information relating to children or people whose circumstances could make identification harmful.

If the Hub operates online forms, websites, analytics, mailing tools, cloud platforms or similar services, privacy and cookie information will be provided where required and settings will be reviewed proportionately.

12. Individual Rights

People have data-protection rights that may include the right to be informed, access their personal data, ask for inaccurate data to be corrected, request erasure or restriction in certain circumstances, object to certain processing, and receive certain data in a portable form. Rights depend on the circumstances and lawful basis being used.

Requests should be sent to info@thejoineryhubglasgow.co.uk. The Hub will verify identity where necessary, respond without undue delay and normally within the statutory timeframe. If a request is complex or a lawful exemption applies, the person will be informed as appropriate.

13. Data Retention and Disposal

The Hub will not keep personal information indefinitely simply because storage is available. Retention periods will reflect the reason the information was collected, legal and regulatory requirements, safeguarding needs, insurance requirements, contractual or funder requirements, and the need to establish, exercise or defend legal claims.

When information is no longer required, paper records will be securely destroyed and electronic records will be deleted or anonymised where reasonably practicable. Some records may need to be retained for longer where safeguarding, legal, finance or insurance considerations apply.

14. Personal Data Breaches

A personal data breach includes accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. Examples include sending information to the wrong person, losing a device or paper file, unauthorised account access, or accidentally publishing confidential information.

Any suspected breach must be reported immediately to the Data Protection Lead. The Hub will take prompt steps to contain the incident, assess the risk, record what happened and decide whether notification to the Information Commissioner's Office (ICO) and/or affected individuals is required. Where a report to the ICO is legally required, it will be made without undue delay and, where feasible, within 72 hours of becoming aware of the breach.

15. Responsibilities

Board of Directors

- Approve and review this policy
- Ensure proportionate arrangements exist for privacy, security and records management
- Consider significant data-protection risks and incidents

Data Protection Lead

- Coordinate day-to-day data-protection arrangements
- Respond to rights requests and data incidents
- Maintain appropriate records and guidance
- Seek specialist advice where a matter is complex or high risk

Everyone handling personal information for the Hub must follow this policy, keep information confidential, use approved systems and report mistakes, losses or suspected breaches promptly.

16. Training and Review

Data-protection awareness will be included in induction or role guidance where relevant. The Board will review this policy at least annually and sooner following a significant breach, material change in activities or systems, or relevant change in law or guidance.

17. Complaints and Regulator

Questions or complaints about how the Hub handles personal information should first be raised with the Data Protection Lead at info@thejoineryhubglasgow.co.uk. Individuals also have the right to raise concerns with the Information Commissioner's Office (ICO).

18. Related Documents

- Safeguarding and Child Protection Policy
- Equality and Diversity Policy
- Health and Safety Policy and workshop risk assessments
- Complaints Policy and Procedure
- Participant consent, media and emergency-contact forms
- Privacy notices and retention arrangements where applicable

Approval

This policy is approved on behalf of The Joinery Hub Glasgow CIC.

Name	Andrew Ferguson
Position	Founder and Director
Approval	Approved electronically for publication
Date	24 July 2026