



CIC NUMBER:
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Project Dragonfly CIC

GDPR Policy

Project Dragonfly CIC UK GDPR & Data Protection Act 2018 Compliance

1. Who We Are

Project Dragonfly CIC is a Community Interest Company based in the United Kingdom. We provide support to children, young people, parents, carers, and families through:

- One-to-one referral-based support
- Parent and carer support groups
- Activity sessions and community-based programmes

Project Dragonfly CIC is the **data controller**, meaning we decide how and why personal information is used.

2. The Information We Collect

We only collect information that is necessary for delivering our services safely and effectively.

Children and Young People

- Name, date of birth, gender
- Contact details (where appropriate)
- School or educational setting
- Relevant health, wellbeing, or behavioural information
- Information shared by parents, carers, or professionals
- Notes from sessions or support work

Parents, Carers, and Families

- Name and contact details
- Relationship to the child
- Referral information
- Support needs and relevant background information
- Attendance at groups or sessions

Professionals and Referrers

- Name, role, organisation, and contact details

Digital Contact

- Information submitted through online forms
- Cookies or analytics data (if used on our website)

3. How We Use Personal Data

Project Dragonfly CIC uses personal information to:

- Provide one-to-one support
- Assess needs and plan appropriate interventions
- Deliver group sessions and community activities
- Communicate with families and professionals
- Monitor attendance and engagement
- Meet safeguarding responsibilities
- Evaluate and improve our services
- Comply with legal and regulatory requirements

We do **not** use personal data for marketing without explicit consent.

4. Lawful Bases for Processing

Under UK GDPR, Project Dragonfly CIC relies on the following lawful bases:

- **Consent** – when families agree to participate in our services
- **Legitimate interests** – delivering community support in a safe, effective way
- **Legal obligation** – safeguarding, reporting concerns, or meeting statutory requirements
- **Vital interests** – protecting someone in an emergency
- **Public task** – where we work with local authorities or statutory partners

We take extra care when processing children's data.

5. Sharing Personal Information

We only share information when necessary and appropriate, such as with:

- Local authority safeguarding teams
- Schools or educational settings
- Health or social care professionals
- Referral agencies
- Emergency services (if someone is at immediate risk)

We never sell personal data or share it for marketing purposes.

Whenever possible, we will discuss information sharing with the family unless doing so would place someone at risk.

6. How We Store and Protect Data

Project Dragonfly CIC uses a range of security measures to protect personal information:

- Password-protected systems
- Encrypted devices
- Restricted access for staff and volunteers
- Secure storage for paper records
- Regular data protection training
- Clear retention and deletion procedures

7. How Long We Keep Information

We keep personal data only for as long as necessary:

- Support records for children and families: **up to 7 years** after support ends
- Safeguarding records: **in line with statutory guidance**
- Referral forms and attendance records: **up to 3 years**
- Financial/administrative records: **6 years**

When no longer needed, information is securely deleted or destroyed.

8. Your Rights Under UK GDPR

You have the right to:

- Access your personal data
- Request corrections to inaccurate information
- Request deletion (in certain circumstances)
- Object to or restrict processing
- Withdraw consent at any time
- Request data portability
- Raise concerns with the Information Commissioner's Office (ICO)

Children's rights may be exercised by a parent or carer depending on age and capacity.

9. Safeguarding and Confidentiality

Because Project Dragonfly CIC works with children and vulnerable families, confidentiality is essential. However, if we believe a child or adult is at risk of harm, we may need to share information with safeguarding agencies. We always follow statutory safeguarding procedures.

10. Contact Us

For questions about this policy or to exercise your data rights, contact:

Data Protection Lead

Project Dragonfly CIC / Julie Oakley MBE

c/o 27 Sandhurst, Yate, South Gloucestershire BS37 4JQ

julie@projectdragonflycic.co.uk

If you are unhappy with how we handle your data, you can contact the **Information Commissioner's Office (ICO)**.