

Data Protection & Privacy Policy

1. Purpose

The Walrus Cruise is committed to protecting personal data and respecting the privacy of children, parents, volunteers, Trustees and supporters. This policy explains how personal data is collected, used, stored and protected in accordance with UK data protection law.

This policy supports the safeguarding and safe operation of the charity and should be read alongside:

- the Safeguarding Policy;
- the Online Communication, Images & Digital Conduct Policy;
- the Volunteer Leader Policy.

Where there is any conflict, safeguarding considerations take precedence.

2. Scope

This policy applies to all personal data processed by The Walrus Cruise, including data relating to:

- children and young people (Crew);
- parents and carers;
- volunteer Leaders and Trustees;
- donors, supporters and enquirers.

It applies to data held in electronic form, paper records and verbal records where these are recorded or acted upon.

3. Legal Framework

The Walrus Cruise processes personal data in accordance with:

- the UK General Data Protection Regulation (UK GDPR);
- the Data Protection Act 2018.

For the purposes of data protection law, The Walrus Cruise is the **Data Controller**.

4. Data Protection Principles

All personal data will be:

1. processed lawfully, fairly and transparently;
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 only as long as necessary;
6. processed securely.

5. Lawful Bases for Processing

The Walrus Cruise processes personal data using one or more of the following lawful bases:

- **Consent** – e.g. use of images, optional communications;
- **Contract** – e.g. participation in a Cruise;
- **Legal obligation** – e.g. safeguarding, insurance, accounting;
- **Vital interests** – e.g. medical emergencies;
- **Legitimate interests** – e.g. safe operation of activities, volunteer management.

For children's data, particular care is taken to ensure processing is fair, necessary and proportionate.

6. Categories of Personal Data

The charity may process:

- contact details;
- dates of birth and age-related information;
- medical and health information (where necessary for safety);
- safeguarding records;
- DBS-related information;
- photographs and video images;
- training, qualification and experience records;
- correspondence and complaints records.

Medical and safeguarding data are treated as **special category data** and handled with enhanced security and confidentiality.

7. Consent

Where consent is relied upon:

- it will be freely given, specific and informed;
- parental consent will be obtained for children;
- consent may be withdrawn at any time.

Withdrawal of consent does not affect processing already carried out where another lawful basis applies (e.g. safeguarding or legal obligations).

8. Data Sharing

Personal data will not be shared with third parties except where:

- required for safeguarding purposes;
- required by law or statutory authorities;
- necessary for insurance or emergency medical treatment;
- essential to the operation of the Cruise (e.g. boatyards), and only where appropriate safeguards are in place.

The Walrus Cruise does not sell personal data.

9. Data Security

Appropriate technical and organisational measures are in place to protect personal data, including:

- restricted access to sensitive information;
- secure storage of paper records;
- password protection for electronic data;
- careful use of personal devices in line with charity policies.

All Trustees and volunteers are expected to handle personal data responsibly and confidentially.

10. Data Retention

Personal data is retained only for as long as necessary for the purpose for which it was collected, and in accordance with legal, safeguarding and operational requirements.

Indicative retention periods are as follows:

- Safeguarding records: retained for a minimum of 6 years after the individual reaches the age of 18, or longer where required by safeguarding guidance or ongoing concerns.
- Medical information: retained for the duration of the Cruise and up to 18 months afterwards, unless required for safeguarding or insurance purposes.
- Volunteer records and DBS-related information: retained while the individual is an active volunteer and for up to 6 years afterwards.

- Images and video: retained only while they remain relevant for their original purpose and in line with consent given.
- Financial records: retained in accordance with statutory requirements.

Secure destruction methods are used when data is no longer required.

11. Individual Rights

Individuals (or parents/carers on behalf of children) have the right to:

- access their personal data;
- request correction of inaccurate data;
- request deletion of data where appropriate;
- restrict or object to certain processing;
- lodge a complaint with the Information Commissioner's Office.

Requests should be made in writing and will be responded to within the required timescales.

12. Data Breaches

Any actual or suspected data breach must be reported immediately to the Commodore or a Trustee.

Appropriate action will be taken, including notification to the Information Commissioner's Office where legally required.

13. Responsibilities

The Trustees are responsible for ensuring that:

- this policy is implemented and reviewed;
- personal data is handled lawfully and safely;
- volunteers receive appropriate guidance.

All volunteers and Trustees have a responsibility to comply with this policy.

14. Review

This policy will be reviewed at least every three years, or sooner if required by changes in law or guidance.

Last updated: February 2026