ARC INITIATIVE

Privacy and Data Protection Policy

How Arc Initiative collects, uses and protects personal information

Policy detail	Information
Policy owner	Chidi O'Hanekwu
Data protection contact	Chidi O'Hanekwu, Chief Executive Officer, chidi@arcinitiative.co.uk
Version	2.0
Last updated	September 2026
Next review due	September 2027, or sooner if the law, our systems or our programmes change
Applies to	Everyone whose personal information Arc Initiative holds, and everyone who handles personal information on our behalf

1. Who we are

Arc Initiative is a Charitable Incorporated Organisation registered with the Charity Commission for England and Wales.

Detail	Information
Charity number	1199808
Information Commissioner's Office registration number	ZB529797
Registered office	167 to 169 Great Portland Street, 5th Floor, London, W1W 5PF
Email	info@arcinitiative.co.uk
Telephone	0207 459 4879

Arc Initiative is the data controller for the personal information covered by this policy. This means we are responsible for deciding what personal information we collect, why we collect it, how it is used and how it is protected.

We handle personal information responsibly, fairly and securely, in line with the UK General Data Protection Regulation and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, together with the Privacy and Electronic Communications Regulations and other applicable law.

This policy explains how we collect, use, store and share personal information relating to young people, parents and carers, referrers, volunteers, mentors, employees, job applicants, donors, supporters, partners and anyone else who engages with us. It sits alongside our Cookies Policy, which explains how our website uses cookies and similar technologies.

2. For our young people

Arc Initiative works with young people aged 16 to 25, including care leavers and care-experienced young people, and with some young people under 18. We want you to understand what happens to the information you give us.

- We ask for information about you so that we can run our programmes, workshops, mentoring and activities safely
- If you are under 18, we may ask for details of your parent, carer or another appropriate emergency contact
- If you are care-experienced or have a leaving care personal adviser, we may ask for their details so that we can work together with them, and only with your agreement unless there is a safeguarding reason
- We may ask about things such as your health, additional needs or access requirements so that we can support you properly
- We may ask about your background so that we can understand whether our programmes are reaching the young people they are designed to support
- You do not have to answer optional equality and monitoring questions, and choosing not to answer will not stop you taking part
- We will only share information where there is a proper reason to do so
- If we are seriously worried about your safety or someone else's safety, we may need to share relevant information with safeguarding professionals, even if you have not given permission
- We will never sell your personal information
- You can ask us what information we hold about you, and ask us to correct anything that is wrong
- We will ask separately for your permission before using your photograph or video for publicity, marketing or promotional purposes
- Saying no to photographs or videos will not affect your place on an Arc Initiative programme

If there is anything in this policy you do not understand, speak to a member of the Arc Initiative team and we will explain it in a way that makes sense to you. We can give you a short, plain version of this policy on request.

3. The information we may collect

Young people taking part in our programmes

- Full name, date of birth and age
- Home address or postcode
- Telephone number and email address
- School, college or educational setting
- Parent or carer details where appropriate, and emergency contact details
- Leaving care personal adviser or allocated worker details where relevant
- Programme or activity applied for or attended, and attendance information
- Progress, achievements and programme outcomes
- Feedback and evaluation information
- Education, employment or training status
- Career interests and aspirations
- Accessibility or additional support requirements

- Dietary requirements or allergies
- Relevant medical information where required for your safety
- Communication preferences
- Photographs, video or testimonials where separate permission has been given

We may also ask for equality, diversity and demographic information, such as ethnic background, gender, disability or additional needs, socio-economic information, eligibility for free school meals where relevant, care experience, young carer status, education or employment status, and other information relevant to the eligibility criteria of a particular funded programme.

We collect this information to understand who we are reaching, identify barriers young people may be experiencing, improve our services and provide evidence to the organisations that fund our work. Where these questions are optional, we make that clear.

Information received through referrals

Young people may be referred to us by schools and colleges, alternative provision settings, local authorities, leaving care teams, youth services, youth offending and justice services, social care services, charities and community organisations, health and wellbeing services, and employment organisations.

A referring organisation may provide name and contact information, the reason for the referral, relevant educational information, support needs, risk information, safeguarding information, accessibility requirements, and relevant health or wellbeing information. We only seek or keep information that is relevant to our work with the young person. Where information about criminal offences or involvement with the justice system is provided, we process it only where it is necessary and lawful and appropriate safeguards are in place.

Parents, carers and emergency contacts

Where appropriate, particularly for participants under 18, we may collect name, relationship to the young person, telephone number, email address, emergency contact information and relevant communication or consent records. We use this to deliver programmes safely, share important information and respond in an emergency.

Volunteers, mentors, facilitators and staff

- Name and contact information
- Curriculum vitae or employment history, skills and experience
- References and availability
- Training records
- Emergency contact details
- Identification and right to work information where applicable
- Disclosure and Barring Service status and safeguarding vetting information where required
- Records relating to programme allocation and delivery
- Expenses or payment information where relevant
- Feedback, supervision or performance information

Job applicants

If you apply for a paid role, we may collect your name and contact details, curriculum vitae, application information, employment and education history, references, interview notes, right to work information, relevant

qualifications, and safeguarding and vetting information where required. Information about unsuccessful applicants is normally deleted in line with our retention schedule unless we have permission, or another lawful reason, to keep it for longer.

Donors and supporters

Where you donate to or support Arc Initiative, we may collect your name, address, email address, telephone number, donation amount and date, donation history, payment information, Gift Aid declaration, taxpayer status where required for Gift Aid, and communication preferences. Where a donation is made through a third-party fundraising or payment platform, that provider processes your payment details under its own privacy arrangements. We do not need to keep full card details where payments are handled by an authorised payment provider.

Events and activities

Where you register for an event, workshop or activity, we may collect your name and contact details, booking information, organisation, school or employer where relevant, dietary requirements, accessibility requirements, emergency information where appropriate, and attendance information.

When you contact us

If you contact us by telephone, email, social media, our website or another channel, we may keep your name and contact details, a record of your enquiry, our correspondence, and any information you choose to give us. We keep this only for as long as it is reasonably needed for the purpose you contacted us about.

Our website

When you use our website, some technical information may be collected automatically, including internet protocol address, browser and device information, pages visited, date and time of visits, approximate location derived from technical information, and how you interact with the site. Our Cookies Policy explains what cookies and similar technologies we use, which ones need your consent, and how to change your choices.

4. Why we use personal information, and our lawful bases

Data protection law requires us to have a lawful basis for using personal information. Depending on the circumstances, we rely on one or more of the following.

What we do	Lawful basis
Registering participants, communicating with them, managing attendance, delivering workshops and mentoring, tracking outcomes and providing support	Legitimate interests in delivering our charitable purposes. Another basis may apply depending on the programme and the relationship with the participant
Safeguarding children, young people and adults at risk, and responding to emergencies	Legal obligation, legitimate interests or vital interests, depending on the circumstances. Safeguarding is also one of the recognised legitimate interests set out in data protection law following the Data (Use and Access) Act 2025
Collecting health, disability and additional support information so that we can make reasonable adjustments and manage risk	Legitimate interests or vital interests, together with an additional condition for special category data such as explicit consent, safeguarding, or substantial public interest
Equality, diversity and impact monitoring	Consent where we ask for it, or another appropriate condition. Monitoring questions are optional and we anonymise or aggregate wherever possible
Reporting to funders on the reach and impact of our work	Legitimate interests in administering funding and evidencing our charitable activities, or another basis depending on the funding agreement
Processing donations, keeping financial records, administering Gift Aid and meeting accounting and tax obligations	Legal obligation, contract or legitimate interests, depending on the activity
Recruiting and managing staff, facilitators, mentors and volunteers, including vetting	Legitimate interests, steps connected with entering into a contract, and legal obligation where applicable
Sending newsletters, fundraising messages and other communications	Consent, or legitimate interests where the law permits. Every message includes a clear way to opt out
Keeping our systems, premises and people safe, and defending legal claims	Legitimate interests and legal obligation

Special category and criminal offence information

Some personal information receives extra protection, including information about race or ethnic origin, health, disability where it reveals health information, religion or philosophical beliefs, sexual orientation, political opinions, trade union membership, and genetic or biometric information used for identification. We are most likely to hold information about ethnicity, health, disability and additional support needs.

Where we process special category information we identify both a lawful basis and an additional condition, such as explicit consent, safeguarding of children and individuals at risk, or substantial public interest. Where we hold information about criminal offences, including from safeguarding referrals or vetting checks, we process it only where the law allows and we apply additional access restrictions. We keep an appropriate policy document covering this processing where the law requires one.

Automated decision-making and artificial intelligence

We do not use solely automated decision-making or profiling to make decisions about a young person's eligibility for our programmes that have legal or similarly significant effects on them. Decisions about people are made by people. Where staff use artificial intelligence tools to help with general work such as drafting, they must not enter personal information, safeguarding information or anything that could identify a young person. If this position changes, we will update this policy and explain how those decisions are made and how to challenge them.

5. Photography, video and testimonials

We may use photography, video, audio recordings or testimonials to celebrate young people's achievements, show the impact of our work and promote our charitable activities.

- We obtain permission before using identifiable photographs, video or testimonials for publicity or marketing, and we record that permission
- For a participant under 18, we obtain permission from a parent, carer or person with parental responsibility as well as from the young person
- Taking part in photography or filming is optional and never affects someone's place on a programme
- We never publish a young person's care status, safeguarding information or other personal circumstances alongside their image or name without their specific, informed agreement
- Permission can be withdrawn at any time by contacting info@arcinitiative.co.uk. Withdrawal applies to future use wherever reasonably possible. We cannot always recall material already printed or published, but we will take reasonable steps to stop further use

6. Who we may share information with

We do not sell personal information. We share it only where there is a genuine and lawful reason.

- Referring organisations, including schools, colleges, local authorities, leaving care teams, youth services and community organisations, where we share only what is necessary, such as attendance, participation or relevant progress information
- Programme and delivery partners who deliver workshops, mentoring, employment opportunities or work experience with us, limited to what they need to deliver the activity safely
- Safeguarding organisations, including children's social care, adult social care, local authority safeguarding teams, the police, health professionals, schools and colleges and other appropriate agencies. Where safeguarding requires us to share information, consent may not be required and there may be circumstances in which we cannot tell the person beforehand
- Funders, normally in anonymised or aggregated form. Where a funding agreement requires identifiable information, we make sure there is a lawful basis and that people are told
- Professional advisers and regulators, including accountants, auditors, insurers, legal advisers, HM Revenue and Customs, the Charity Commission and the Information Commissioner's Office
- Service providers who help us operate, including email and communications systems, website hosting, online forms, cloud storage, information technology support, finance systems, payment processing, fundraising platforms, survey and evaluation tools, video conferencing and analytics

Where another organisation processes information on our behalf, we put a written contract in place requiring appropriate security and confidentiality, and we check that those arrangements are being followed.

Sharing information outside the United Kingdom

Some technology and service providers may process or store information outside the United Kingdom. Where that happens, we make sure an appropriate legal transfer mechanism is in place, such as adequacy regulations or the International Data Transfer Agreement or addendum, together with any additional safeguards required. We consider where data is stored when choosing systems.

7. How long we keep personal information

We do not keep personal information indefinitely. We keep it only for as long as it is reasonably needed for the purpose it was collected, or where we have a legal, contractual, safeguarding or regulatory reason to keep it for longer.

Type of record	Retention
Participant programme records	Normally up to 6 years after the participant's last significant contact with us, or until the young person reaches the age of 25 where that is later, unless a different period is justified
Safeguarding and child protection records	Kept securely in line with safeguarding requirements and statutory guidance, the nature of the concern and our safeguarding responsibilities. These records are often kept substantially longer than ordinary programme records
Equality and monitoring information	Only as long as needed for evaluation, reporting and impact measurement, and converted to anonymous statistics wherever practical
Photography, video and consent records	While the material is in use, and for a reasonable period afterwards to evidence the permissions that applied
Donation, finance and Gift Aid records	Normally at least 6 years, in line with accounting and HM Revenue and Customs requirements. Enduring Gift Aid declarations may be kept longer
Newsletter and marketing records	While a person remains subscribed, with a minimal suppression record kept afterwards so that we respect a request not to be contacted
Unsuccessful job or volunteer applications	Normally up to 12 months after the recruitment process, unless there is a legitimate reason or permission to keep them longer
Recruitment and vetting records for people appointed	For the duration of the engagement and normally up to 6 years afterwards. Disclosure and Barring Service certificate information is not retained beyond what is necessary to record the outcome of the check
Event booking information	Normally up to 2 years after the event, unless it forms part of another record
Financial and accounting records	Normally at least 6 years, or longer where required by law

When information is no longer required, we securely delete, destroy or anonymise it.

8. How we keep personal information secure

- Access to personal information is limited to people who genuinely need it
- Systems are password protected, access controlled and kept up to date
- Organisational accounts are used for Arc Initiative activity rather than personal email accounts
- System access is reviewed when people join, change role or leave
- Everyone receives data protection and safeguarding guidance and training

- Disclosure and Barring Service checks are completed for roles that require them
- Sensitive information is kept separately, with additional access restrictions
- We use trusted service providers and put written agreements in place
- Records are securely deleted when no longer required, and back-up and recovery arrangements are maintained
- Data protection and security arrangements are reviewed at least annually

9. Personal data breaches

A personal data breach includes information being lost, disclosed accidentally, accessed without permission, altered, destroyed or sent to the wrong person. If we become aware of a breach we will contain and investigate it, assess the effect on the people concerned, record it, take action to reduce further risk, notify the Information Commissioner's Office where the legal threshold is met, and inform affected individuals where required. Where a breach must be reported to the Information Commissioner's Office, we will do so without undue delay and, where feasible, within 72 hours of becoming aware of it.

10. Your data protection rights

Depending on the circumstances, you have the right to:

- Be informed about how your personal information is used
- Ask for a copy of the personal information we hold about you
- Ask us to correct information that is inaccurate or incomplete
- Ask us to delete personal information in certain circumstances
- Ask us to restrict how we use your information
- Object to certain uses of your information
- Object to direct marketing at any time
- Withdraw consent where we rely on consent
- Ask to receive certain information in a portable format
- Complain to us, and to the Information Commissioner's Office

Some rights are not absolute. There may be circumstances where we are required or permitted to keep or continue using information despite a request, including for safeguarding, legal or regulatory reasons. We will explain this if it applies.

Young people's rights

Children and young people have data protection rights in their own right. Where a young person understands their rights well enough to exercise them, we deal with them directly and communicate in a way they can understand. Where necessary, a parent, carer or person with parental responsibility may exercise rights on behalf of a younger child. The best interests of the young person and any safeguarding considerations always come first. In designing online services used by under 18s, we have regard to the Information Commissioner's Office code of practice on age appropriate design.

How to exercise your rights

To ask about the personal information we hold, or to exercise any of your rights, contact us at Arc Initiative, 167 to 169 Great Portland Street, First Floor, London, W1W 5PF, by email at info@arcinitiative.co.uk, or by telephone on 0207 459 4879. We may need to confirm your identity before releasing information. We normally respond to a valid request within one month.

11. How to complain to us about the use of your information

> **New requirement, in force since 19 June 2026**
>
> The Data (Use and Access) Act 2025 added a right for people to complain directly to an organisation about how it has used their personal information. Organisations must provide an accessible way to complain, acknowledge a complaint within 30 days, take appropriate steps to respond, and keep the person informed.

If you are unhappy with how we have collected, used, stored or shared your personal information, please tell us first so that we can put it right.

1. Send your complaint to info@arcinitiative.co.uk, or write to us at the address above, or telephone 0207 459 4879. If you need help to make a complaint, or need another format, tell us and we will make it possible.
2. We will acknowledge your complaint within 30 days of receiving it, and sooner wherever we can.
3. We will investigate without undue delay, keep you informed of progress, and tell you the outcome and what we have done as a result.
4. We keep a record of data protection complaints and review them so that we learn from them.
5. If you are not satisfied with our response, you can complain to the Information Commissioner's Office by telephone on 0303 123 1113, or through its website. You can complain to the Information Commissioner's Office at any time, although it will normally expect you to have raised the matter with us first.

12. Our responsibilities

Arc Initiative makes sure that personal information is used lawfully, fairly and transparently, collected for clear and legitimate purposes, relevant and limited to what is necessary, accurate and kept up to date where necessary, kept no longer than required, protected by appropriate security, and handled in a way that respects people's rights. We keep a record of our processing activities, we carry out data protection impact assessments where a new project is likely to involve high risk, and we review the information we hold, the systems we use and the organisations we share information with.

13. Changes to this policy

We review this policy at least once a year, and sooner where there are significant changes to our programmes or services, the information we collect, the technology or systems we use, the organisations we share information with, or the law and regulatory guidance. Where significant changes are made, the updated version is published with a revised date.

Version	Date	Summary of changes
2.0	September 2026	Updated for the Data (Use and Access) Act 2025, including the new complaints procedure in force from 19 June 2026 and safeguarding as a recognised legitimate interest. Added a data protection contact, a lawful basis table, criminal offence data, international transfer mechanisms, retention of recruitment and vetting records, the code of practice on age appropriate design, artificial intelligence and automated decisions, records of processing and impact assessments, and a cross-reference to the Cookies Policy
1.0	September 2026	Original Privacy and Data Protection Policy

Signed on behalf of the Board of Trustees
Stephanie Nicola

Name and role
Stephanie Nicola

Date
01/09/2026