



Confidentiality and Data Protection Policy

Last update: Feb 2026

Next update: Feb 2027

Definitions

Charity	Refers to URBOND, a registered charity in the United Kingdom.
GDPR	General Data Protection Regulation, as incorporated into UK law post-Brexit.
Responsible Person	Refers to Ousmane Drame, Chief Executive Officer (CEO).
Register of Systems	A record of all systems and contexts in which personal data is processed by the Charity.

Purpose of this Policy

This policy outlines how URBOND processes personal data and complies with data protection legislation in the UK, including the GDPR and the Data Protection Act 2018.

Confidentiality and Privacy

URBOND is committed to maintaining confidentiality and protecting the privacy of all individuals who engage with our services, particularly families, children, and young people.

- Information shared with the Charity is treated with respect and only accessed on a need-to-know basis.



- Personal information will not be disclosed to third parties without the consent of the individual (or their legal guardian, if applicable), unless there is a safeguarding concern, legal obligation, or risk of harm.
- Safeguarding concerns override confidentiality and may require data sharing with appropriate authorities.
- Personal information is stored securely and processed in compliance with the UK GDPR and Data Protection Act 2018.
- Individuals have the right to know how their information is used, and to request corrections or deletions where appropriate.

This commitment to confidentiality and privacy ensures that service users feel safe and supported when engaging with URBOND.

Data protection principles

URBOND is committed to processing personal data lawfully, fairly, and transparently. In line with Article 5 of the GDPR, personal data shall be:

- 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.
- Kept only as long as necessary.
- Processed securely, ensuring protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

General provisions

- This policy applies to all personal data processed by URBOND.
- The Responsible Person is accountable for ensuring ongoing compliance.
- This policy shall be reviewed at least once a year.
- URBOND is registered with the Information Commissioner's Office (ICO) as a data controller.



Lawful, fair and transparent processing

- URBOND maintains and reviews a Register of Systems annually.
- Individuals have the right to access their personal data. Requests will be responded to promptly and in line with legal requirements

Lawful Bases for Processing

Personal data must be processed on a lawful basis: consent, contract, legal obligation, vital interests, public task or legitimate interests. The lawful basis must be recorded in the Register of Systems.

- Where consent is the lawful basis, clear opt-in consent will be documented.
- Individuals will have the right to withdraw consent, and systems will reflect such changes promptly.

Data minimisation

- The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy

- Reasonable steps are taken to ensure data accuracy and to keep it up to date.

Archiving / removal

- A data retention policy is in place to avoid retaining data longer than necessary.
- Each data category is assessed to determine retention period, purpose, and legal obligation.

Data Security

- Data is stored securely using up-to-date software.
- Access is restricted to staff who need it.



- Deletion of data is conducted securely and irreversibly.
- Regular data back-ups and a disaster recovery plan are in place.

Data Breach Procedures

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website: [UK GDPR data breach reporting \(DPA 2018\) | ICO](#)).

Reason of collecting personal information:

We use personal data for the following purposes:

- Enable access and engagement with our services.
- Monitor participation and progress.
- Provide tailored support.
- Evaluate service quality.
- Protect the welfare of children and young people.
- Fulfil legal and contractual obligations.

Information collected:

- Personal identifiers (e.g. name, DOB, address, contact details)
- Emergency contacts
- Ethnicity, language, and other characteristics
- Safeguarding and child protection information
- Education and employment status
- Medical details (e.g. allergies, medications)
- Attendance and participation records
- Agency referrals and assessments
- Behavioural records
- Photographs (with consent)



How we collect your data:

Data is collected through consent forms, referrals, and assessments. We carry out annual checks to ensure data remains accurate and up to date.

Sharing information

Information is only shared with relevant partners and with appropriate consent, unless legally required. All transfers are conducted securely. We may share data with:

- Schools, colleges, and training providers
- Local authorities
- Children and family support services
- Referring agencies

Requesting access to your personal data

Under data protection legislation, you have the right to access your data. To make a Subject Access Request, please contact: **Ousmane Drame – CEO, URBOND**

This policy was last reviewed on: Feb 2026

Signed:

Ousmane Drame

A handwritten signature in black ink, appearing to read "Ousmane Drame", is enclosed in a thin black rectangular border. The signature is fluid and cursive, with a long horizontal stroke at the end.