

Creating Adventures

Data Protection Policy

Last updated: 1st September 2025

Next Review Date: 1st September 2026

1. Introduction

1.1 Creating Adventures (“we”, “us”, “our”) is a Charitable Incorporated Organisation (Charity No. 1167842) whose aim is to provide free activities for adults with autism and learning disabilities in Warrington, enriching their lives and fostering belonging. ([Creating Adventures](#))

1.2 The purpose of this policy is to set out how we collect, use, store, share and protect personal data, both through our website (www.creatingadventures.org.uk) and through our database system (CiviPlus) [Privacy Policy](#), in line with UK data protection law in particular the UK GDPR and Data Protection Act 2018.

1.3 We are committed to ensuring that personal data is handled lawfully, transparently, securely, and in ways that respect the rights of the individuals whose data we hold.

2. Definitions

- **Personal Data:** any information relating to an identified or identifiable person.
 - **Special Category Data (Sensitive Data):** includes e.g. health, disability, mental health, needs, etc.
 - **Processing:** obtaining, recording or holding data, or use of data.
 - **Data Controller:** we determine how and why personal data is processed.
 - **Data Processor:** a third party processing data on our behalf, under our instruction.
 - **Data Subject:** an individual whose data we process.
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3. Data Controller

Creating Adventures is the Data Controller in respect of all personal data collected through our website, physical forms, via volunteers, members, supporters and those interacting with us in other ways.

Where we use third-party processors (e.g. CiviPlus, email newsletter providers, etc.), those act under our instructions and under contracts that ensure they meet data protection standards.

4. What Personal Data We Collect and Why

We collect different types of personal data for different purposes. Here's a non-exhaustive list of what we collect, how, and why:

Type of Data	Source	Purpose / Use	Legal Basis
Contact details (name, address, telephone, email)	Members, supporters, volunteers, staff, via website forms, physical forms, phone calls	To register as a member, to inform about activities, newsletters, to communicate about participation, emergencies, etc.	Consent, contract (for services, membership), legitimate interests (keeping people informed)
Demographic / background data, health or disability information, care/support needs etc.	Members, volunteers etc., via forms or in person	To ensure safe and appropriate provision of activities, to tailor support, comply with safeguarding, risk assessment	Consent, possibly legal obligation in some cases (health & safety, safeguarding)
Financial data (if making donations, paying fees)	Donors, participants	Processing payments, accounting, audit	Contract / legal obligation
Website interaction and usage data (cookies, IP address, device etc.)	Web visitors via our website	To improve the website, track usage, ensure security, for analytic purposes	Legitimate interests / possibly consent
Photographs / videos of participants	Taken during activities or events, sometimes with permission	Promotion / marketing, keeping records, celebrating achievements	Consent (explicit)

5. Collection Methods; Role of CiviPlus

5.1 We collect personal data:

- Directly from individuals (members, volunteers, donors) via forms (online & paper), via email or phone.
- Via our website interactions (contact forms, newsletter sign-ups, cookies).
- From third parties only in limited circumstances and with valid consent or legal justification.

5.2 CiviPlus Database / CRM:

- We use CiviPlus to store and manage our contacts, members, volunteers, donors, supporters, and records of their participation, preferences, consent statuses, communications history etc.
 - When someone fills in a webform (including via the website), the data may be automatically stored in CiviPlus. If they are a returning contact, new info may be merged/appended to their record. (guide.civi.plus)
 - We keep records of permissions/consents in CiviPlus so that we can track what people have agreed to (e.g. newsletters, photography use etc.)
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6. Lawful Bases & Consent

6.1 We ensure that all processing of personal data is done under one (or more) of the lawful bases permitted under the UK GDPR, such as:

- Consent: where individuals have given their clear permission for us to process their data for a specific purpose (e.g. receiving our newsletter, being photographed).
- Contract: where processing is necessary to fulfil a contract with the individual (e.g. membership, activity participation).
- Legal obligation: where we are required by law to process data (e.g. safeguarding, health & safety).
- Legitimate interests: for purposes such as administration, communicating with supporters, maintaining relationships etc., provided that those interests are not overridden by individuals' rights and interests.

6.2 Consent is:

- Freely given, specific, informed, and unambiguous.
 - Documented (we record what people have consented to, when, and what information they were given).
 - Able to be withdrawn at any time, and we make this easy.
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7. Data Minimisation and Accuracy

7.1 We will only collect personal data that is necessary for the specific purposes we have identified. We will avoid collecting more information than we need.

7.2 We will make reasonable efforts to ensure that personal data we hold is accurate and up to date. Individuals should help by informing us of changes (address, contact info, health status etc.) as soon as possible.

8. Data Storage, Security, and Retention

8.1 Storage & Security

- We will store data securely in CiviPlus (hosted / managed under contract with appropriate security standards) and in other secure digital or physical systems.
- Access is limited to those staff and volunteers who need it to perform their duties.
- Passwords, encryption, secure backups, and other technical & organisational measures will be used to protect against unauthorized access, data loss or corruption.
- Where physical records are kept (paper forms etc.), they will be stored in locked cabinets in secure premises.

8.2 Retention

- Data will not be kept longer than necessary for the purposes for which it was collected.
- We will have specific retention periods for different categories (e.g. membership records, volunteer records, financial records, photographic material etc.), after which data is archived or securely deleted, in accordance with law and best practice.

- We will also take account of any legal, statutory, accounting or audit requirements for retaining certain records for specific minimum periods.
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9. Sharing / Disclosure of Data

9.1 We will not share personal data with third parties except in limited, well-defined, and lawful circumstances, such as:

- Where required by law (e.g. safeguarding, legal obligations).
- With service providers or subcontractors who process data on our behalf (e.g. CiviPlus, email platform, payment processors etc.), under a data processing agreement.
- With consent (for example, sharing a story or photo for marketing, or sharing contact information if someone agrees).

9.2 If over time we need to work with other organisations, partners or funders requiring data, we shall ensure that:

- Only necessary data is shared.
 - Appropriate data sharing agreements are in place.
 - Security and confidentiality are maintained.
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10. Your Rights

Individuals whose data we hold (data subjects) have the following rights under the UK GDPR:

- **Right of Access:** you can ask for a copy of the personal data we hold about you.
- **Right to Rectification:** you can ask us to correct data that is inaccurate or incomplete.
- **Right to Erasure (“right to be forgotten”):** you can ask us to delete your data in certain circumstances.
- **Right to Restrict Processing:** you can ask us to limit how we process your data.
- **Right to Data Portability:** you can ask for a machine-readable copy of your data to transmit to another controller.
- **Right to Object:** you can object to our processing of your data, for instance for direct marketing or where our basis is legitimate interests.

- **Right to Withdraw Consent:** where processing is based on consent, you can withdraw it at any time.

If you wish to exercise any of those rights, please contact: [Data Protection Contact – name, email, postal address]. We will respond in accordance with statutory timescales.

11. Cookies and Website Data

- Our website uses cookies and tracking technologies to improve experience, gather analytics etc. We inform visitors about these via cookie banners / consent mechanisms in line with current UK requirements. ([Creating Adventures](#))
 - We collect certain technical data automatically (IP addresses, device/browser data etc.), generally under our legitimate interests, or where required, after obtaining consent.
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12. Photographs, Images, Video

- When photographing or videotaping participants, we will obtain explicit consent.
 - Consent will include how the images/video may be used (e.g. promotional materials, website, social media etc.), how long they will be kept, and our policy for withdrawing such consent.
 - If individuals do not wish to be photographed or included, we will respect that.
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13. Data Breach

- We will maintain procedures to detect, report, and investigate personal data breaches.
 - If a breach is likely to result in a high risk to individuals' rights and freedoms, we will notify the Information Commissioner's Office (ICO) as required by law (within 72 hours where possible).
 - Where feasible, we will also inform affected individuals if their personal data has been compromised.
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14. Training, Responsibilities & Accountability

- We will ensure staff, volunteers and trustees understand the importance of protecting personal data, what their obligations are, and receive appropriate training.
 - We will designate someone (e.g. a Data Protection Lead or Officer) responsible for overseeing data protection compliance and this policy.
 - We will maintain internal documentation (e.g. record of processing activities) to show compliance.
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15. Changes to this Policy

- We may amend this policy from time to time (for example where legal requirements change, or our operations change).
 - When we make significant changes, we will update the “Last updated” date, and where appropriate, let data subjects / stakeholders know via our website or by email.
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16. Contact & Complaints

- If you have any questions, concerns, or complaints about how we process your personal data, or want to exercise any of your rights, please contact:

Data Protection Lead / Officer- Jenny Allcock

Creating Adventures

Orford Community Hub, Festival Ave, Warrington, WA2 9EP

Email: jenny.allcock@creatingadventures.org.uk

Telephone: 01925 500136

- If you're unhappy with our response, you also have the right to lodge a complaint with the Information Commissioner's Office:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Website: ico.org.uk

A copy of this policy will be available to view on our website:

www.creatingadventures.org.uk