



Auntie's Cookery Academy

Data Protection and Privacy Policy (GDPR)

1. Purpose and Statement of Intent

Auntie's Cookery Academy is dedicated to empowering vulnerable people (aged 18–25) through practical cookery, life skills and hands-on support. To do this well, we sometimes need to collect and process personal information about learners, staff, volunteers and partners.

We're committed to handling all personal data responsibly, transparently, and in line with privacy rights. This policy explains how we protect people's data and comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope

This policy applies to **all personal data processed by Auntie's Cookery Academy**, whether digital or paper-based. It covers:

- Learners enrolled in our 12-week course or participating in our social enterprise
- Staff (including tutors and instructors)
- Volunteers
- Trustees and suppliers
- Visitors to our venues or public-facing events
- Any other individuals whose personal information we handle through our activities

We are mindful of additional access and support needs individuals may have—particularly for those with physical disabilities, long-term health conditions or neurodivergent traits—and take care to handle all personal data sensitively and inclusively.

3. Data Protection Principles

We follow the core principles of data protection as set out in the GDPR:

- **Lawfulness, fairness and transparency**
- **Purpose limitation** (only using data for the purpose it was collected)
- **Data minimisation** (only collecting what we actually need)
- **Accuracy** (keeping information up to date)
- **Storage limitation** (not holding on to it longer than necessary)



- **Integrity and confidentiality** (security)
 - **Accountability** (being able to demonstrate compliance)
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4. Types of Personal Information We May Collect

Depending on the context, we may collect:

- **Basic identifiers** – name, contact details, date of birth, etc.
- **Emergency contacts**
- **Educational or employment history** (where relevant to programme entry or support)
- **Bank or financial details** (for bursary or salary purposes)
- **Health information**, including physical or mental health needs, neurodivergent traits or disability-related adjustments
- **Special category data** – like ethnicity or religion (where relevant to safeguarding, reporting or inclusion monitoring)
- **Safeguarding or incident records** (where required)
- **Criminal offence information** (for staff or volunteers in safeguarding or regulated roles)
- **Cookies and website usage data**

We only collect sensitive data when there's a clear reason for doing so—usually with your consent, unless a legal duty applies.

5. How Personal Information is Collected

We collect data in a few different ways:

- Directly from individuals (e.g. during sign-up, onboarding or email contact)
 - From third parties (e.g. referrers, employers or safeguarding agencies)
 - Automatically via our website (e.g. cookies, analytics tools)
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6. Legal Basis for Processing

We only process personal data when we have a legal basis for doing so. This might include:

- **Fulfilling a contract** – e.g. enrolling someone in a course or paying a tutor
- **Legal obligation** – e.g. safeguarding, insurance, or charity reporting
- **Legitimate interest** – e.g. improving our programmes, responding to enquiries
- **Consent** – for anything optional or where sensitive data is involved



Consent can be withdrawn at any time by contacting us.

7. What We Use Personal Information For

We use personal data to:

- Deliver and evaluate our programmes
- Support learners effectively (including making reasonable adjustments)
- Monitor safety and wellbeing
- Process payments and reimbursements
- Maintain HR, volunteer, and supplier records
- Promote events and services (if consent has been given)
- Meet our legal duties (especially around safeguarding and funding)

We also retain anonymised data to help understand trends, improve our offer and report impact.

8. Sharing Personal Information

We may share data with:

- Our own staff and volunteers – on a strict need-to-know basis
- Awarding bodies – to issue certificates
- Work placement hosts – where a learner is involved
- Funding bodies – to meet reporting requirements
- Support agencies – to coordinate care
- Service providers – like cloud storage or payroll systems
- Authorities – where legally required (e.g. police, social services, HMRC)

We never sell data or share it for marketing purposes. We don't store personal data outside the UK.

9. Data Security and Storage

We take data security seriously:

- All digital systems are password-protected and, where needed, encrypted
- Paper records are stored securely
- Only trained, authorised individuals can access sensitive data
- Personal devices are not used to store identifiable data



- We regularly review and update our data protection practices
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10. Data Retention

We aim to **only keep personal information for as long as we genuinely need it**, and no longer.

- For **learners**, personal data is normally held for **no more than 12 months** after their involvement ends
- In most cases, we are acting as a **data processor** on behalf of a partner organisation (who sets the retention policy)
- We retain **anonymised learner data** for evaluation and reporting (this contains no personal identifiers)
- **Safeguarding records** are usually retained for up to **six years**, in line with statutory guidance
- For **staff, volunteers, trustees, partners and suppliers**, records may be held for up to **seven years** to meet legal or audit requirements

When personal data is no longer needed, we delete or anonymise it securely.

11. Your Rights

You have rights under data protection law, including:

- **Right to access** your personal data
- **Right to correct** inaccurate data
- **Right to erasure** (in some cases)
- **Right to object** to processing
- **Right to restrict** how data is used
- **Right to withdraw consent** at any time
- **Right to request data portability**

To exercise any of these, contact our Data Protection Officer at:

hello@auntiescookeryacademy.org

12. Website and Cookies



We use cookies on our website to help improve your experience and track usage patterns. You can choose to accept or reject them through your browser settings. Declining cookies may limit some features.

13. Questions or Complaints

If you're concerned about how your data is being used, we encourage you to speak with us first by contacting the DPO. If you're still not happy, you can contact the Information Commissioner's Office (ICO): www.ico.org.uk

14. Responsibilities

- **Leadership/Trustees** – overall responsibility for upholding this policy
 - **Data Protection Officer (DPO)** – oversees data handling and responds to queries
 - **Programme staff** – make sure data is handled lawfully and securely
 - **Everyone else** – must follow guidance, report concerns, and keep information safe
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15. Policy Review

This policy will be reviewed **at least once every 12 months**, or sooner if:

- Relevant laws, regulations, or guidance change;
- A serious incident, complaint, or near miss occurs;
- Feedback from learners, staff, or partners suggests improvements; or
- Operational changes make an update necessary.

This includes review following changes in ICO guidance or data breach incidents.

Signed: 

Printed Name: Emily-Jane Dale

Job Title: CEO and Chair

Date: 29th October 2025