

DATA PROTECTION POLICY

Cycling Without Age Oxfordshire

Registered Charity | Community Interest Organisation | Oxfordshire, England

Document Details	
Policy Owner	Chair & Trustee Board, Cycling Without Age Oxfordshire
Approved By	Trustee Board
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Next Review Date	Annually (by March each year)
Applies To	All trustees, hub coordinators, volunteer pilots, and any person acting on behalf of the charity

1. Introduction and Purpose

Cycling Without Age Oxfordshire ("the Charity") is a community-led charitable organisation providing free trishaw rides to socially isolated, elderly, and vulnerable adults across Oxfordshire. We operate four hubs — Central Oxford, Kidlington/Woodstock, Wallingford, and Didcot — and our work brings us into contact with personal data relating to our passengers, volunteer pilots, hub coordinators, partner organisations, and supporters.

This policy sets out how the Charity collects, uses, stores, and protects personal data, and the responsibilities of everyone who handles that data on our behalf. It has been prepared in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Compliance with this policy is mandatory for all trustees, hub coordinators, volunteer pilots, and anyone acting on behalf of the Charity.

2. Definitions

Term	Definition
The Charity	Cycling Without Age Oxfordshire, a registered community interest charitable organisation.
UK GDPR	The UK General Data Protection Regulation, retained in UK law under the Data Protection Act 2018.
Personal Data	Any information that can identify a living individual, directly or indirectly (e.g. name, contact details, health information, DBS reference).
Special Category Data	Sensitive data including health conditions, disability information, and criminal records (DBS checks). Requires additional protection.

Data Subject	Any individual whose personal data is processed by the Charity (e.g. passengers, volunteers, contacts).
Processing	Any operation performed on personal data including collection, storage, use, sharing, and deletion.
Responsible Persons	The Chair and Trustee Board of Cycling Without Age Oxfordshire, who are accountable for this policy.
Hub Coordinators	Volunteers who manage trishaw sessions at each of the four Oxfordshire hubs and may handle personal data in that role.
ICO	The Information Commissioner's Office, the UK's independent authority for data protection.

3. Data Protection Principles

In accordance with Article 5 of the UK GDPR, the Charity is committed to ensuring that all personal data is:

- Processed lawfully, fairly, and transparently in relation to the individual;
- Collected for specified, explicit, and legitimate purposes, and not further processed in a manner incompatible with those purposes;
- Adequate, relevant, and limited to what is necessary for the purposes of processing (data minimisation);
- Accurate and kept up to date — reasonable steps will be taken to erase or correct inaccurate data without delay;
- Kept in an identifiable form for no longer than necessary for the stated purpose (storage limitation);
- Processed securely, protecting against unauthorised or unlawful access, accidental loss, destruction, or damage.

The Trustee Board (Responsible Persons) is accountable for ensuring these principles are upheld across all hubs and activities.

4. Data We Collect and Why

The Charity collects only the personal data necessary to deliver our services safely and effectively. The categories of data we process are set out below.

4.1 Passengers and Ride Recipients

We collect this data to coordinate safe trishaw rides and monitor the wellbeing of vulnerable individuals:

- Full name and preferred name
- Contact telephone number (and, where relevant, contact details of a carer or family member)
- Care home or residential address (where rides are arranged through a partner organisation)

- Any relevant health or mobility considerations shared voluntarily, to ensure the ride is safe and comfortable
- Ride history — dates and locations of trishaw sessions (used for service monitoring and reporting to funders)

The lawful basis for processing passenger data is legitimate interests (delivering our charitable mission) and, where health information is provided, explicit consent.

4.2 Volunteer Pilots and Hub Coordinators

We collect this data to manage our volunteer workforce, ensure safeguarding compliance, and coordinate hub operations:

- Full name and contact details (email address and telephone number)
- Emergency contact information
- DBS (Disclosure and Barring Service) check reference number and clearance date
- Training completion records
- Hub assignment and availability preferences (managed through the Book2Go platform)
- Next of kin details (held securely for emergency purposes only)

The lawful basis for processing volunteer data is legitimate interests (safe delivery of our service) and legal obligation (DBS compliance and safeguarding of vulnerable adults).

4.3 Partner Organisations

We hold professional contact information for representatives of our partner organisations, including care homes (such as Auditcare Care Homes), parish councils, and NHS social prescribing teams. This is processed on the basis of legitimate interests to maintain operational relationships.

4.4 Donors and Supporters

We collect name and contact details for donors and supporters where they have provided consent. Donation records processed through PayPal are subject to PayPal's own privacy terms, but we retain donation amounts for our charity accounts. We do not store payment card details.

4.5 Website Visitors

Our website (www.cwaoxfordshire.org.uk or www.cyclingwithoutage.org.uk/oxfordshire) may collect anonymous usage data through standard web hosting analytics. No personal data is collected through the website without the user's active submission (e.g. via our volunteer sign-up or contact forms).

5. Lawful Basis for Processing

The Charity will only process personal data where it has a lawful basis to do so under Article 6 (and Article 9 for special category data) of the UK GDPR. The relevant bases used by the Charity are:

Lawful Basis	How We Use It
Consent	Where passengers or volunteers voluntarily share health information or sign up to receive communications from us. Consent can be withdrawn at any time.
Legitimate Interests	For operational activities where individuals would reasonably expect their data to be used (e.g. coordinating rides, contacting volunteers, maintaining partner relationships).
Legal Obligation	To fulfil our safeguarding duties, including processing DBS check information in line with statutory requirements for working with vulnerable adults.
Vital Interests	In emergency situations where sharing information may be necessary to protect someone's life or physical safety.

6. Consent

- a. Where the Charity relies on consent as the lawful basis for processing, evidence of that consent will be retained alongside the personal data.
- a. Consent must be freely given, specific, informed, and unambiguous. Pre-ticked boxes or inferred consent are not acceptable.
- a. Where volunteers register via Book2Go or our website, their submission constitutes informed consent to process their details for the stated purpose.
- a. Individuals have the right to withdraw consent at any time. Where consent is withdrawn, data will be erased (subject to any overriding legal obligation, such as DBS records).
- a. Where the Charity communicates with individuals based on their consent (e.g. newsletters or volunteer updates), a clear and simple means of unsubscribing will be provided.

7. Data Minimisation and Accuracy

- a. The Charity will only collect data that is necessary for the stated purpose. We will not collect data 'just in case'.
- a. Hub coordinators and trustees will review the data they hold regularly (at minimum annually) to ensure it remains accurate and relevant.
- a. Passengers and volunteers are encouraged to notify their hub coordinator or the Chair of any changes to their personal details.
- a. Inaccurate data will be corrected or erased promptly upon identification.

8. Data Retention

Personal data will not be retained for longer than is necessary for its stated purpose. Our retention guidelines are:

Data Category	Retention Period	Reason
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Passenger ride records	3 years from last ride	Service monitoring, funder reporting, safeguarding review
Volunteer contact details	Duration of active volunteering + 1 year	Operational continuity
DBS check records	6 months after decision (reference number only thereafter)	Legal requirement under DBS Code of Practice
Training records	Duration of active volunteering + 3 years	Safeguarding audit trail
Donor records	7 years	Charity accounting and Gift Aid requirements
Partner contact details	Duration of active partnership + 1 year	Legitimate operational interest

When data is due for deletion, it will be securely and permanently erased from all systems. Paper records will be shredded. Deletion must be sanctioned by at least two trustees.

9. Data Security

- a. All personal data held digitally will be stored securely using password-protected systems with access limited to those with a genuine operational need.
- a. The Charity uses Google Workspace (Google Drive and Gmail) as its primary digital storage environment. Access is restricted to trustees and designated hub coordinators.
- a. Book2Go is used for volunteer registration and scheduling. Volunteer data entered through Book2Go is subject to that platform's own security standards, in addition to this policy.
- a. Physical records (such as paper consent forms or ride logs) will be stored in a locked location at the relevant hub or the Chair's secure premises. Physical records will not be left unattended in vehicles or public spaces.
- a. All trustees and hub coordinators with access to personal data must use strong, unique passwords and must not share login credentials.
- a. When data is no longer required, digital data will be permanently deleted and paper records will be securely shredded.
- a. Appropriate back-up measures will be in place. Duplicate copies of critical data will be maintained securely.
- a. Any new systems or tools used to process personal data must be reviewed and approved by the Trustee Board before use.

10. Sharing Personal Data

The Charity will not sell, rent, or trade personal data. Data will only be shared with third parties in the following circumstances:

- With partner care homes or organisations, where strictly necessary to coordinate safe trishaw rides for a specific individual, and only with their knowledge;
- With statutory bodies (e.g. local authorities, NHS, police) where required by law or in an emergency to protect a person's vital interests;

- With funders or grant-making bodies, using anonymised or aggregated data only unless specific individual consent has been obtained;
- With the DBS, in fulfilment of our legal safeguarding obligations;
- With our website hosting provider and payment processor (PayPal) to the extent necessary to operate those services.

The Charity will ensure any third parties with whom data is shared are GDPR-compliant and will not process it beyond the agreed purpose.

11. Individual Rights

Under the UK GDPR, all individuals whose data we process have the following rights:

Right	What This Means for Our Data Subjects
Right of Access	You may request a copy of the personal data we hold about you at any time (Subject Access Request).
Right to Rectification	You may ask us to correct any inaccurate or incomplete data we hold about you.
Right to Erasure	You may ask us to delete your data where we no longer have a lawful basis to retain it.
Right to Restriction	You may ask us to restrict how we use your data while a complaint or query is being resolved.
Right to Portability	Where processing is based on consent or contract, you may ask for your data in a portable format.
Right to Object	You may object to processing based on legitimate interests. We will cease unless we have compelling grounds to continue.
Right to Withdraw Consent	Where processing is based on consent, you may withdraw it at any time without detriment.

To exercise any of these rights, please contact the Chair of Cycling Without Age Oxfordshire at the email address listed on our website (www.cwaoxfordshire.org.uk). Requests will be acknowledged within 5 working days and responded to within 30 days.

12. Safeguarding and Special Category Data

Given that our service is specifically designed to benefit elderly, isolated, and vulnerable adults, the Charity recognises its responsibility to handle sensitive information with particular care.

- a. Health and mobility information shared by passengers will only be collected where necessary for their safe participation in a trishaw ride, and only with their explicit consent.
- a. DBS certificate information for volunteers will be processed in accordance with the DBS Code of Practice. Certificate numbers and clearance dates will be retained; full certificate contents will not be copied or stored.
- a. No volunteer will undertake unsupervised activities with passengers until a satisfactory DBS check has been completed and recorded.

- a. Hub coordinators are responsible for ensuring that safeguarding documentation is current and accessible to the Trustee Board on request.
- a. Special category data will only be accessible to the Chair and Trustee Board, and to hub coordinators where strictly necessary.

13. Data Breach Procedures

In the event of a data breach — meaning accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data — the Charity will:

- Immediately notify the Chair (or in their absence, another trustee) upon discovery of the breach;
- Assess the risk to the rights and freedoms of affected individuals within 24 hours;
- Where the breach is likely to result in a risk to individuals' rights and freedoms, report it to the ICO within 72 hours of becoming aware;
- Where the breach is likely to result in a high risk to individuals, notify those individuals without undue delay;
- Document the breach, the assessment, and all actions taken, regardless of whether it is reported to the ICO;
- Review and implement improvements to prevent recurrence.

Further guidance on breach reporting can be found at ico.org.uk. The ICO helpline is 0303 123 1113.

14. Roles and Responsibilities

Role	Responsibilities
Chair (Responsible Person)	Overall accountability for data protection compliance. Approves policy and any significant changes to data processing. Primary point of contact for ICO and breach reporting.
Trustee Board	Collective responsibility for governance. Minimum of two trustees must sanction deletion of personal data. Annual review of this policy.
Hub Coordinators	Day-to-day handling of volunteer and ride data at hub level. Ensuring data is collected, stored, and shared only in accordance with this policy. Reporting any concerns or suspected breaches to the Chair promptly.
Volunteer Pilots	Handling any passenger information they are given on a strictly need-to-know basis. Not retaining, copying, or sharing personal data beyond the immediate ride coordination purpose.

15. Training and Awareness

All new trustees, hub coordinators, and volunteer pilots will receive an introduction to this policy as part of their onboarding and induction process. This will be provided by the Chair or a designated trustee.

All those with access to personal data will be reminded of their obligations annually, and this policy will be made available on the Charity's website resource hub (www.cwaoxfordshire.org.uk) for ongoing reference.

16. Policy Review

This policy will be reviewed by the Trustee Board at least once per year, or sooner following:

- A significant change in the Charity's operations or data processing activities;
- A data breach or near-miss incident;
- Changes to UK data protection legislation or ICO guidance;
- The introduction of new technology or third-party platforms.

Updated versions of this policy will be circulated to all trustees, hub coordinators, and made available on the Charity's website.

17. Contact and Complaints

If you have any questions about this policy or how the Charity handles your personal data, please contact:

Chair, Cycling Without Age Oxfordshire

Website: www.cwaoxfordshire.org.uk

Email: Available via the contact form on our website

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office:

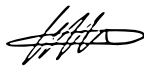
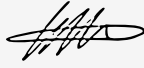
Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Helpline: 0303 123 1113

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

Policy Sign-Off

	Name	Signature	Date
Approved by (Chair)	Mr K. Audit		04/04/2025
Approved by (Trustee)	Mr K. Audit		04/04/2025