

Privacy Policy

Last reviewed: 18 Aug 2026

Next review date: Aug 2027

Responsible Person: Chelsea Haughton, Head of Operations and People

Introduction

The Literacy Pirates is a charity registered with The Charity Commission in England and Wales under registration number 1145115 and is a company limited by guarantee in England and Wales under registration 7790039. Our registered office address is 136-138 Kingsland High Street, Dalston, E8 2NS.

We must process personal data, including special category data, to deliver our services and programmes. As such, we act as a Data Controller. Our Data Protection Officer (DPO) is Megan Kennedy (admin@literacypirates.org).

We comply with the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025. We also follow the ICO's Age-Appropriate Design Code for services likely to be accessed by children.

Data Protection Governance

We take the following actions to maintain compliance:

- Annual policy review and six-monthly procedural review.
- Six-monthly data cleansing.
- Regular staff training on data protection.
- Prompt handling of Data Subject Rights requests (one month to respond; may extend by up to two months if complex; we may pause the timeframe when awaiting essential clarification from the requester under the DUA Act 2025).
- Breach assessment and reporting to the ICO within 72 hours where required.

Our Lawful Bases for Processing

We process personal data under the following lawful bases (UK GDPR Article 6) and, where applicable, an additional lawful basis for special category data (UK GDPR Article 9):

- Contract – to perform a contract with you (e.g., employment).
- Legal obligation – to comply with the law (e.g., safeguarding).
- Legitimate interests – to administer our programmes, evaluate effectiveness, and undertake proportionate fundraising.
- Consent – for marketing, photography, and certain special category data.

For special category data, we typically rely on Article 9(2)(d) processing by not-for-profit bodies, or Article 9(2)(g) substantial public interest.



Data We Collect

We collect different types of data from the following groups:

- Young people – personal, educational, and relevant safeguarding information from parents/guardians and schools.
- Volunteers – contact, demographic, DBS, and relevant safeguarding information.
- Funders/supporters – contact, donation, and engagement history.
- Staff – employment, payroll, emergency contact, performance, and safeguarding information.

We may collect photos and video footage for safeguarding, training, monitoring, and publicity (with consent where required).

How We Store and Protect Your Data

We store data in secure systems including Salesforce, Microsoft 365, FormAssembly, Mailchimp, Rosterfy, and Class.com. All devices used to access data are password-protected, encrypted, protected with anti-virus software, and require multi-factor authentication (MFA). Backups are encrypted and stored securely.

Data Retention

We retain personal data according to the following schedule:

Data Type	Retention Period	Deletion Method
Children's records	4 years after leaving programme	Secure deletion/ anonymisation
Video footage (online lessons)	Programme duration + 6 months	Secure deletion
Volunteers' records	4 years after last session	Secure deletion/ anonymisation
Gift Aid records	7 years	Secure deletion
Job/volunteer applications	6 month post-process	Secure deletion

Direct Marketing

We may contact you by email or SMS about our work and ways to support us using the 'soft opt-in' provision under the Privacy and Electronic Communications Regulations as amended by the Data (Use and Access) Act 2025. You can opt out at any time.

Cookies and Tracking Technologies

We use cookies and similar technologies to improve our website, understand visitor behaviour, and deliver relevant advertising. Some cookies are strictly necessary, while others require your consent. You can manage your cookie preferences at any time.

External evaluation

We want to make sure our programme is helping the children we work with. To do this, we will be appointing an external evaluator and would like to access some information about the children we work with that is held in the National Pupil Database (NPD), which is managed by the Department for Education.

We use this information to measure whether our programme is making a real difference to children's learning. By comparing Young Pirates' results with similar children who haven't joined the programme, we can understand what is working well and where we can improve. This helps us make the programme even better.

Who We Share Your Data With

We never sell your data. We share information only when necessary with:

- Schools/referral partners – for programme delivery and safeguarding.
- Volunteer partner organisations – for volunteer management and safeguarding.
- Funders/supporters – for reporting impact; and with consent share information including photos when they sign a Term and Condition Agreement for the use of the information.
- External evaluator and the National Pupil Database – for conducting an external evaluation to better understand our impact

We may also share data without consent where there is a safeguarding or legal obligation.

Your Data Protection Rights

You have the right to access, rectify, erase, restrict, object, and port your data. Requests will be responded to within one month, with possible extensions if complex.

How to complain about the way we handle your data

If you would like more information, a request or wish to raise a concern about the way we have handled your data email our Data Protection Officer at admin@literacypirates.org or calling 020 3227 1777.

You can also have the right to raise concerns to the Information Commissioner's Office on 0303 123 1113 or at <https://www.ico.org.uk>