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Data Protection Policy (v1.0.0.2026)

Document Control

Effective Date: November 1 2026
Version: 1.0.0.2026
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Approved by: Michael Arthur, Deputy Chair of Council
Review Date:October 20 2026

Introduction

The Duke of Edinburgh's International Award Barbados is registered in Barbados as charity number 3. Through the Duke of Edinburgh's International Award Barbados Charity (Barbados Charity Number 214), it is licensed by The Duke of Edinburgh's International Award Foundation (England and Wales Charity Number 1072453) as a National Award Operator to administer, manage and coordinate the delivery of The Duke of Edinburgh's International Award ("The Award") in Barbados.

Purpose

This Data Protection Policy outlines the internal framework, responsibilities and standards that The Duke of Edinburgh's International Award Barbados ("Award Barbados") employs to ensure compliance with the Barbados Data Protection Act (BDPA) and to protect the personal data of participants, staff, volunteers, and other stakeholders**.**

Scope

This policy applies to all staff, Members of Council, Trustees, Award Volunteers, Award Leaders, contractors, and third parties who process personal data on behalf of Award Barbados. It covers all personal data collected, stored, processed, or shared by Award Barbados, including but not limited to data stored in the Online Record Book (ORB).

Governance and Responsibilities

1. Board of Trustees
    - Ensure oversight of data protection practices and compliance with the BDPA.
    - Provide necessary resources for data protection initiatives and staff training.

2. National Award Council
    - Development and review of data protection policies and processes.
    - Ensure that adequate data protection systems are in place.
3. Data Privacy Lead (DPL)
    - Monitor compliance with the BDPA and this policy.
    - Serve as the point of contact for data protection inquiries and issues.
    - Coordinate or oversee appropriate data protection reviews, audits and risk assessments.
4. Staff and Volunteers
    - Adhere to the data protection principles outlined in this policy.
    - Report any suspected data breaches or violations immediately to the DPL.
5. Third-Party Processors
    - Process personal data only for authorized purposes and in accordance with applicable data protection, confidentiality and security requirements.
    - Process personal data only for specified purposes and in compliance with the BDPA.

Data Protection Principles

Award Barbados adheres to the following data protection principles under the BDPA:

1. Lawfulness, Fairness, and Transparency
   Data will be collected and processed lawfully, fairly, and transparently.
2. Purpose Limitation
   Personal data will only be collected for legitimate purposes necessary for Award delivery.
3. Data Minimization
   Only data that is necessary for specified purposes will be collected and processed.
4. Accuracy
   Personal data will be accurate and updated regularly.
5. Storage Limitation
   Personal data will be retained only for as long as necessary for its intended purposes.
6. Integrity and Confidentiality
   Appropriate security measures will be in place to protect personal data from unauthorized access, loss, or damage.

Governance and Accountability

Award Barbados is responsible for implementing appropriate organisational and technical measures to ensure compliance with the Barbados Data Protection Act and this Policy. Award

Barbados will maintain appropriate records, procedures, training and oversight mechanisms to support and demonstrate responsible management of personal data.

Lawful Processing

Award Barbados will only collect and process personal data where there is a lawful basis for doing so under the Barbados Data Protection Act and for a specified, legitimate purpose. The applicable lawful basis will be determined before processing begins and, where required, communicated to the individual through the Privacy Notice or other appropriate information. Consent will be obtained where it is the appropriate lawful basis for processing and will not be treated as a substitute where another lawful basis applies.

Special/Sensitive Personal Data

Award Barbados recognises that certain personal data requires additional protection due to its sensitive nature. Where such data is collected or processed, Award Barbados will ensure that there is a lawful basis and, where applicable, an additional condition for processing under the Barbados Data Protection Act. Access will be limited to those who have a legitimate need to use the information, and appropriate technical and organisational safeguards will be applied to protect it from unauthorised access, disclosure, loss or misuse. Particular care will be taken when processing information relating to health, disability, safeguarding matters or other sensitive information concerning Award participants, staff, volunteers or other individuals.

Data Handling

1. Data Collection and Use

   Award Barbados will collect and process personal data only where it is necessary for a specified and legitimate purpose and where an appropriate lawful basis exists under the Barbados Data Protection Act. Personal data should, where practicable, be collected directly from the individual and limited to what is necessary for the purpose for which it is collected. Award Barbados will provide individuals with appropriate information about the collection and use of their personal data through its Privacy Notice or other appropriate means. Personal data will be used only for the purpose for which it was collected, or for another purpose permitted by law, and access will be limited to authorised persons who require the information to perform their responsibilities. Award Barbados will take reasonable steps to ensure that personal data is accurate and kept up to date where necessary.

   Personal data may be recorded, organised, retrieved, consulted, used or otherwise processed as necessary for legitimate Award-related activities, including the

administration, delivery, monitoring and assessment of the Award. Such processing must be carried out in accordance with this Policy, the applicable lawful basis, and any relevant requirements or agreements governing the systems or services through which the data is processed.

2. ORB and IAF Data Processing

Award Barbados uses the Online Record Book (ORB) and other systems provided or authorised by The Duke of Edinburgh's International Award Foundation (the Foundation) for the administration and management of the Award. Personal data relating to participants, Award Leaders, volunteers and other Award stakeholders may therefore be stored or processed through systems operated by, or on behalf of, the Foundation or other authorised service providers. Award Barbados recognises that personal data may be stored or processed outside Barbados through the ORB, the Foundation or other authorised service providers. Any such transfer or processing must comply with the applicable requirements of the Barbados Data Protection Act, including requirements relating to adequacy, appropriate safeguards or applicable statutory exceptions.

3. Data Storage and Security

Award Barbados will take appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, loss, destruction or other forms of misuse. Personal data will be stored only in systems, locations or physical records appropriate to the nature and sensitivity of the information, with access restricted to authorised persons who have a legitimate need to access it. Appropriate safeguards, including access controls, secure authentication, confidentiality measures and other security measures proportionate to the risks involved, will be implemented and maintained. Physical records containing personal data must be stored securely and protected from unauthorised access.

Award Barbados will periodically review its data storage and security arrangements to identify and address risks to personal data. Where personal data is stored or processed by the IAF, through the ORB, or by another authorised service provider, Award Barbados will take reasonable steps to ensure that appropriate data protection and security measures are in place in accordance with applicable legal, contractual and organisational requirements.

4. Data Sharing and Disclosure

Award Barbados will only share or disclose personal data where there is a lawful basis for doing so and where the disclosure is necessary for a legitimate Award-related, legal or regulatory purpose. Personal data may be shared with the International Award Foundation, including through the Online Record Book, Award Centres, assessors, volunteers, contractors, service providers, regulators, emergency services or other authorised parties where appropriate. Award Barbados will limit disclosures to the information necessary for the relevant purpose and will take reasonable steps to ensure that recipients handle personal data securely and in accordance with applicable data protection requirements.

Where personal data is processed by a third-party processor or service provider on behalf of Award Barbados, appropriate contractual or other safeguards will be used to establish the permitted purposes of processing, confidentiality and security requirements, and the responsibilities of the parties. Personal data will not be disclosed to third parties for unrelated purposes unless permitted or required by law, or otherwise supported by an appropriate lawful basis.

5. Data Retention and Disposal

Award Barbados will retain personal data only for as long as it is necessary for the purpose for which it was collected or as required or permitted by law, contractual obligations or legitimate organisational requirements. Retention periods should be established according to the nature and purpose of the information. When personal data is no longer required, Award Barbados will securely delete, destroy or otherwise dispose of it in a manner appropriate to the nature of the information, subject to any legal, regulatory, historical or other legitimate requirements to retain it.

Data Subject Rights and Requests

Award Barbados will respect the rights of individuals in relation to their personal data as provided by the Barbados Data Protection Act. Requests relating to access, correction, deletion, restriction, objection, withdrawal of consent or other applicable rights must be referred to the Data Privacy Lead and handled in accordance with applicable legal requirements and within any prescribed timeframes. Award Barbados will take reasonable steps to verify the identity of the requester and will maintain appropriate records of requests and the action taken.

International Transfers

Award Barbados will not transfer personal data to a country or territory outside Barbados except in accordance with the requirements of the Barbados Data Protection Act. Where

personal data is transferred internationally, Award Barbados will ensure that the applicable requirements relating to adequacy, appropriate safeguards or an applicable statutory exception are satisfied.

Where international processing is undertaken by a third-party processor or service provider, Award Barbados will take appropriate steps to ensure that the processing and any onward transfers are carried out in accordance with applicable data protection requirements.

Data Breach Response Plan

In the event of a data breach, Award Barbados will:

1. Identify and Contain
    - Immediately identify the breach and take steps to contain it.
2. Assess the Impact
    - Evaluate the nature and scope of the breach, including data affected.
3. Notify Authorities and Affected Parties
    - Immediately report all suspected or actual personal data breaches to the DPL.
    - Assess whether notification to the Data Protection Commissioner is required under the BDPA and, where required, make the notification within the applicable statutory timeframe.
    - Notify affected individuals where required by law and appropriate in the circumstances.
4. Remediate and Prevent
    - Implement measures to address vulnerabilities and prevent future breaches.

Data Protection Impact Assessments

Where the proposed collection or use of personal data is likely to result in a significant risk to the rights and freedoms of individuals, Award Barbados must assess whether a Data Protection Impact Assessment (DPIA) is required. A DPIA should be used to identify, assess and minimise privacy risks, particularly where personal data will be processed in a more intrusive manner or in ways that could result in discrimination, identity theft, fraud, financial loss or other significant harm. A single DPIA may be used where it adequately addresses multiple instances of similar processing. Where a DPIA is undertaken, Award Barbados will assess the origin, nature, particularity and severity of the identified risks and the measures available to mitigate them.

The Data Privacy Lead must be informed when a potential need for a DPIA is identified and will coordinate the assessment and any necessary risk mitigation measures, consulting the Foundation's Data Privacy Lead where appropriate. Where a DPIA identifies a high risk that cannot be adequately mitigated through appropriate safeguards, Award Barbados will consider

whether consultation with the National Data Protection Commissioner is required and will involve the Foundation's Data Privacy Lead where relevant.

Training and Awareness

Award Barbados will:

1. Provide appropriate data protection training to staff, Council Members, Trustees, Award Leaders and volunteers, as appropriate to their roles;
2. Include relevant data protection requirements in onboarding;
3. Provide role-appropriate guidance to persons handling personal data.

Records, Monitoring and Compliance

Award Barbados will:

1. Conduct regular audits/reviews to ensure compliance with the BDPA and this policy;
2. Maintain records of processing where applicable;
3. Maintain appropriate records of data protection incidents, complaints, data subject requests and any corrective actions;
4. Review and update this policy annually or as required by changes in legislation or organizational needs.

Contact Information

For inquiries related to this Data Protection Policy, please contact:

Fabian Norville – Operations Manager
The Duke of Edinburgh's International Award Barbados
Sheraton Mall, Sargeant's Village, Christ Church, Barbados
office@theawardbarbados.com
436-8754

You may also contact the Data Protection Commissioner at:
Data Protection Commission, Ministry of Industry, Innovation, Science and Technology,
5th Floor SSA Building,
Vaucluse, St. Thomas.
Email: lisa.greaves@barbados.gov.bb

Related Documents and Requirements

- Award Barbados Privacy Notice
- IAF Data Protection Policy
- IAF Data Privacy Notice
- Award Barbados Serious Incident Reporting Policy
- Award Barbados Safeguarding Policy
- ORB Terms and Conditions
- Relevant Award Centre/Volunteer Agreements
- Applicable Barbados Date Protection legislation and regulations

This policy was reviewed and approved by the National Award Council Executive on

October 20 2026.