

## Data Protection Notice

Policy name	Data Protection Notice
Date created	
Date reviewed	Jan 2022
Approved by	Trustees
Next review	Jan 2025
If you require this document in an alternative format, such as large print, on a coloured background please contact us <a href="mailto:info@thebrunswickcentre.org.uk">info@thebrunswickcentre.org.uk</a> 01484 469 691 / 01422 341 764	

As a Data Controller and Data Processor, the Brunswick Centre is committed to Data Protection. We only record information needed for the legitimate interest of providing services performed under contract, service improvement, employment, and volunteering opportunities.

Data protection is encompassed in our systems and processes including, but not limited to:

- Forms (electronic and hard copy) used to record information;
- Storage security: password protected; approved firewalls and encryption for virtual information; and locked filing cabinets for hard copies;
- IT support which is contracted to a specialist IT solutions provider;
- Online Client Recording Management system (CRM) which is contracted to a specialist CRM system provider
- Mandatory training for staff on information governance, confidentiality, and data protection;
- Policies, procedures, and processes for recording, reporting, and escalating serious and untoward incidents, including “actual” and “near-miss” data breaches (for more information please read the Brunswick Centre’s Serious and Untoward Incident policy).

We do not disclose an individual’s personal information or data unless:

- We have been given explicit prior consent\* by that individual to do so;
- We are required to do so by law; for example, a court subpoena; or
- The individual is at risk of harm to themselves or others.

\* *Consent may be withdrawn at any time.*

We do not sell information or data.

We may use anonymised data for reporting and monitoring purposes as required by funders and for accountability and governance purposes.

The Data Protection Act 2018 gives individuals rights which the Brunswick Centre is committed to upholding. These rights are:

1. **The right to be informed** – about what information and data we hold about you, what we do with it, and how long we hold it.
2. **The right of access** – information and data we hold about you. You can request this and we have 28 days to provide this to you. There is no charge\*\*
3. **The right to rectification** – of information and data we hold. We will amend and update information and data if we have got it wrong or if it is inaccurate.
4. **The right to erasure** – of your information and data held by us so you are forgotten, unless there are legal obligations not to; for example, accountancy and bookkeeping, which require records to be held for seven years.
5. **The right to restrict processing** – of your information and data; for example, while you request us to amend or update it.

6. **The right to data portability** – of information and data held by and related to you (and you only) which you wish to pass to a third party. There is no charge\* for this.
7. **The right to object** – to direct marketing from us.
8. **Rights in relation to automated decision making and profiling** – as a responsible charity, we do not use automatic decision-making or profiling.

*\*\*We may charge if requests are vexatious, overly repetitive, or inappropriately costly to the charity.*

We only store information and data for as long as is necessary and dispose of it securely.

If you would like to know more about the information and data we collect about you and how we use it, or to access what we hold about you, please contact:

John McKernaghan  
Data Protection Lead  
The Brunswick Centre  
Marten House  
Fern Street East  
Huddersfield  
HD1 6SB  
01484 469 691 / 01422 341 764  
[john@thebrunswickcentre.org.uk](mailto:john@thebrunswickcentre.org.uk)

The Brunswick Centre is registered with the Information Commissioner's Office (ICO) (registration number Z7169323). You may contact the ICO:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF  
0303 123 1113

The Brunswick Centre recognises there may be consequences for individuals of any data breach and will take robust action in line with its Data Breach Policy should this occur by:

- Investigating the data breach;
- Informing you that a data breach has occurred, how and when it occurred, what data has gone missing, what you can do to protect yourself, what we are doing about it, and what support we can offer you, and give you the opportunity to make a formal complaint to the Brunswick Centre;
- If appropriate, submit a Data Breach Report to the Information Commissioner's Office (ICO) within three days of becoming aware of it;
- If appropriate, report to the local Caldicott Guardians;
- Submitting a Brunswick Centre Serious and Untoward Incident Report and, if appropriate, escalate immediately to inform the charity's trustees and the commissioners of the service;
- Making a decision on reporting to the police.

The scope of our Data Breach Policy ensures all Brunswick Centre service users, staff, volunteers, trustees, sessional workers, and students on placement are covered and have duties and responsibilities to protect data information.