

The Brunswick Club for Young People Data Protection Policy

Purpose

The Brunswick Club for Young People handles and processes all personal and sensitive data held about its employees, volunteers, children and young people in accordance with the Data Protection Act 1998. As an employer The Brunswick Club complies with the Data Protection Act from the moment data on an individual is obtained up until the point where it is returned, deleted or destroyed. This policy outlines The Brunswick Club's procedure for the use of all data held for as long as the Club is responsible for it.

1. Data Controller

1.1 The Brunswick Club is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

2. Collection of data

2.1 The Brunswick Club works with children and young people aged six to nineteen years and is responsible for their welfare and well-being while on its premises. It has a responsibility to the children and young people, their parents and guardians, its employees and volunteers and the local community to create a safe and secure environment for those in its care. In order to do this it is necessary to collect personal and sensitive information about employees, volunteers, children and young people and process this information in accordance with the Data Protection act.

1.2 The Brunswick Club will only collect information relevant to the functions of the Club as a charitable organisation. This will include personal information that identifies individuals, financial information and sensitive data disclosed in Disclosure Barring System checks.

1.3 The collection of this information should not result in unfair treatment on the basis of any of the nine protected characteristics and will only be used to inform equal opportunities practice and other processes related to employment that will be detailed in contracts.

2. Processing or use of data

2.1 Personal or sensitive data collected by The Brunswick Club or on their behalf will only be used for the purpose specified when the data is obtained.

2.2 The Brunswick Club uses both paper and electronic filing systems to record

data. Only authorised personnel will have access to this information and access will only be granted with the permission of the Club Manager.

- 2.3 Data collected will never be in excess of what is required for the purpose specified when requested. If there is a concern about this, please consult with the Club Manager.

3. Destruction of data

- 3.1 Data is held by The Brunswick Club until it is no longer necessary. This means when a child or young person stops using the service, for example upon reaching their 20th birthday or a staff member or volunteer reaches the end of their contract or terminates their volunteering agreement.
- 3.2 When no longer required all personal data stored in hard copy form will be shredded prior to disposal and all personal data stored in electronic form will be erased from all relevant databases, spread sheets and electronic lists.
- 3.3 The Club Manager shall be responsible for determining when data should no longer be stored and for ensuring its safe and secure destruction.

4. Disclosure of data

- 4.1 Data about an individual involved with The Brunswick Club will never be disclosed without their consent unless it is requested by the Metropolitan Police for an investigation related to a crime. In some circumstances information may also need to be provided to the London Borough of Hammersmith and Fulham in relation to funding requirements. Individuals who have provided data related to this purpose will be notified of its use when data is requested from them.

5. Responsible person

- 1.1 The Club Manager is responsible for the day to day implementation of this policy.

Consultation and Commitment to Review

The Brunswick Club is committed to the review and updating of its policies and procedures through consulting with its employees, volunteers and children and young people. Employees and volunteers will be consulted on changes to policies through staff meetings and children and young people through youth meetings.

The employees' and volunteers' representative is Danny Volino.

This policy was reviewed by the Management Committee on 18th July 2016.

This policy will be reviewed by the Management Committee in July 2017.