

The Brunswick Club for Young People Data Protection Policy

Data Protection Law

Before 31 December 2020, UK organisations that processed personal data were bound by two laws: the EU GDPR (General Data Protection Regulation) and the UK DPA (Data Protection Act) 2018. After 31 December 2020, the EU GDPR no longer applied directly in the UK. However, UK organisations must still comply with its requirements.

First, the DPA 2018 enacts the EU GDPR's requirements in UK law. Second, the UK government has issued a statutory instrument – the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 – which amends the DPA 2018 and merges it with the requirements of the EU GDPR to form a data protection regime for the UK context known as the UK GDPR.

Data Protection Principles

The Brunswick Club is committed to processing data in accordance with its responsibilities under the UK General Data Protection Regulation (UK GDPR).

Article 5 of the UK GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Introduction

This Data Protection Policy sets out how The Brunswick Club collects, uses, maintains, and discloses information that it collects from you as a user, member, friend, supporter, trustee, management committee member, volunteer, staff member, or any other stakeholder of the Club.

The Brunswick Club is committed to ensuring your privacy is protected. Should we ask you for certain information by which you can be identified, be assured it will only be used in accordance with this Data Protection policy.

Why this policy exists

This data protection policy ensures The Brunswick Club

- Complies with data protection law and follows good practice.
- Protects the rights of all stakeholders.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

General provisions

- This policy applies to all personal data processed by the Charity.
- The Club Manager shall take responsibility for The Brunswick Club's ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Brunswick Club shall register with the Information Commissioner's Office as an organisation that processes personal data.

Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair, and transparent, The Brunswick Club shall maintain a Register of Systems (a register of all systems or contexts in which personal data is processed by The Brunswick Club).
- The Register of Systems shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to The Brunswick Club shall be dealt with in a timely manner. (For more detailed information, please see *Appendix 2: Subject Access Requests*.)

Lawful purposes

- All data processed by The Brunswick Club must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task, or legitimate interests (see ICO guidance for more information).
- The Brunswick Club shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent shall be clearly available and systems shall be in place to ensure such revocation is reflected accurately in The Brunswick Club's systems.

Data minimisation

- The Brunswick Club shall ensure that personal data are adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy

- The Brunswick Club shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

Archiving / removal

- To ensure that personal data is kept for no longer than necessary, The Brunswick Club shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- The archiving policy shall consider what data should/must be retained, for how long, and why.

Security

- The Brunswick Club shall ensure that personal data is stored securely using modern software that is kept up to date.
- Access to personal data shall be limited to personnel who need access and appropriate security shall be in place to avoid unauthorised sharing of information.
- When personal data is deleted, this shall be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, The Brunswick Club shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data
- Request correction of the personal data that we hold about you

Contact and complaints

If you have any queries about this Data Protection policy or how we process your personal data you may contact us on 020 7385 4856, email us at info@thebrunswickclub.org.uk or

write to us at The Brunswick Club, 34 Haldane Road, Fulham, London SW6 7EU. Please mark all enquiries for the attention of the Club Manager. Alternatively, you can contact the Chairman of the Management Committee via our office.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner's Office via their website: www.ico.org.uk

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 22nd January 2024.

This policy will be reviewed by the Management Committee in January 2025.

APPENDICES

- 1. Register of Systems**
- 2. Subject Access Requests**

Appendix 1 - Register of Systems

How and when we collect information

We collect personal data from our users when:

- we ask parents/carers to complete an online Youth Club Membership Form on behalf of their child;
- we ask parents/carers to complete a Booking & Consent Form on behalf of their child for a place on one of our Youth Club sessions, Cash Prize Football sessions, Holiday Schemes, Hindleap Warren Residentials, and / or any other on-site or off-site activity;
- we ask young people to complete one of our online Senior Youth Club Membership Forms.

Parents and carers filling in forms for those under 16 years of age are consenting to us collecting and holding data on their behalf.

We collect personal data from Trustees, Management Committee Members, Staff and Volunteers when:

- we ask them to complete information / contact forms at the outset of their respective roles at the Club;
- they voluntarily give us their details.

We collect personal data from friends, supporters and donors when:

- they first register their interest with us in becoming a friend, supporter or donor of the Club;
- they first complete a donor form;
- they make a donation to the Club via our Just Giving page and do not request that their details remain anonymous.

The types of information we collect

We collect the following information from users and members:

Information	Stored in paper form	Stored electronically
Child / young person's name		✓
Address		✓
Post Code		✓
Date of birth		✓
Age		✓
Gender		✓
Ethnicity		✓
School attending		✓
School year		✓
Medical condition, disabilities, special education needs		✓

Attendance records		✓
Parent/carer names		✓
Relationships to child		✓
Contact telephone numbers		✓
Photographic consent		✓
Doctor's contact details (Hindleap Warren only)		✓
In loco parentis consent		✓

We collect the following information from Staff:

Information	Stored in paper form	Stored electronically
Name	✓	✓
Address	✓	✓
Telephone / Mobile No	✓	✓
NI Number	✓	✓
Date of Birth	✓	✓
Gender		✓
Ethnicity		✓
Name of bank	✓	✓
Bank address	✓	✓
Account number	✓	✓
Sort code	✓	✓
Account name	✓	✓

We collect the following information from Trustees, Management Committee members and Volunteers:

Information	Stored in paper form	Stored electronically
Name	✓	✓
Address	✓	✓
Telephone / Mobile No	✓	✓
Email address	✓	✓
Ethnicity	✓	✓
Date of Birth	✓	✓

We collect the following information from donors:

Information	Stored in paper form	Stored electronically
Name	✓	✓
Address	✓	✓
Telephone / Mobile No:	✓	✓
Email address	✓	✓

UK tax payer status	✓	✓
Bank account name	✓	
Bank account number	✓	
Bank sort code	✓	✓
Bank name	✓	✓
Bank address	✓	✓

We collect the following information from friends and supporters:

Information	Stored in paper form	Stored electronically
Name	✓	✓
Address	✓	✓
Telephone / Mobile No:	✓	✓
Email address	✓	✓

Photographs, films and videos of children and young people engaged in Brunswick Club activities are selectively displayed in the Club, on our website, on our social media platforms, or in other Brunswick related publicity, by consent only.

All paper records are stored securely in our locked office.

All electronic data, including photographs, are stored on our computers, in our locked office, which are used only by staff who have secure passwords.

Who has access to your information

We will not sell or rent out your personal data to third parties. All the personal information we process is processed by our staff in person or by remote computer access in our offices at 34 Haldane Road, London SW6 7EU.

Information on young people aged 11+ years who attend our Senior Youth Club, currently held on Wednesday, Friday, and Saturday nights, is also recorded on the IYSS, a database system managed by the London Borough of Hammersmith & Fulham, to whom we report. This is a requirement of their funding of us. Individuals who provide us with data which is recorded on IYSS are informed of this use when data is requested from them. For more information on the Privacy Policy of the London Borough of Hammersmith & Fulham, please visit their website: www.lbhf.gov.uk

Information on young people aged 11+ years who take part in our Fulham Kicks Cash Prize Football Sessions, currently held on Friday and Saturday nights, and any other activity jointly organised with Fulham Kicks, is shared with Fulham FC Foundation. For more information on the Privacy Policy of Fulham FC Foundation, please visit Fulham FC's website: www.fulhamfc.com

We employ an IT company, SomaData Consultancy Ltd, to manage all our IT requirements. For more information on their privacy policy please contact Somadata Consultancy Ltd, m. +44 (0) 7917 412 049, email: getintouch@somadata.co.uk

How long information is kept

We will hold your personal information on our systems for as long as is necessary for the relevant activity, and/or in accordance with your informed consent, and/or if we are legally required to hold it to fulfil our statutory obligations.

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, spreadsheets, and electronic lists.

The Club Manager shall be responsible for determining when data should no longer be stored and for ensuring its safe and secure destruction. This will usually be for a period of six years after your last interaction with us.

We review our retention periods for personal information on a regular basis.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. We do not use cookies to gather personal information about you. By accepting cookies from our website, you consent to Google processing data about your activity. You may block cookies by selecting the appropriate settings in your browser, but this may affect the full functionality of the website. When directed to visit a third-party website, you may be asked to accept cookies. You should check the third-party website for more information about these.

Appendix 2 - Subject Access Requests

Anybody who makes a request to see any personal information held about them by The Brunswick Club is making a subject access request. All information relating to the individual, including that held in electronic or manual files should be considered for disclosure.

All requests should be sent to the Club Manager and must be dealt with in full without delay and at the latest within one month of receipt.

Any individual may appoint another person to request access to their records. In such circumstances The Brunswick Club must have written evidence that the individual has authorised the person to make the application and the Club Manager must be confident of the identity of the individual making the request and of the authorisation of the individual to whom the request relates.

Access to records will be refused in instances where an exemption applies, for example, information sharing may place the individual at risk of significant harm or jeopardise police investigations into any alleged offence(s).

A subject access request must be made in writing. The Brunswick Club may ask for any further information reasonably required to locate the information.

An individual only has the automatic right to access information about themselves, and care needs to be taken not to disclose the personal data of third parties where consent has not been given, or where seeking consent would not be reasonable, and it would not be appropriate to release the information. Care must be taken in the case of any complaint or dispute to ensure confidentiality is protected.

All files must be reviewed by the Club Manager before any disclosure takes place. Access will not be granted before this review has taken place.

Where all the data in a document cannot be disclosed a permanent copy should be made and the data obscured or retyped if this is more sensible. A copy of the full document and the altered document should be retained, with the reason why the document was altered.