

Bridge Foundation Privacy Policy

Policy Summary

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This document contains:
Policy: Broad statements that MUST be followed
Procedure: Step by step instructions that MUST be followed
Guidance: Recommended practice that SHOULD be followed

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1. About this document

This document sets out what employees, sessional staff and volunteers must do to ensure the privacy of personal data. We comply with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR).

2. Policy

The Bridge Foundation is committed to protecting and respecting the privacy of our clients, customers, funders, employees and other people that contact us.

The Bridge Foundation will ensure that the GDPR seven key principles lie at the heart of our approach to processing personal data.

The GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

This policy has been developed in accordance with the principles established by the Information Commissioner's Office: <https://ico.org.uk/>

This policy should be read alongside our policies and procedures on:

Breach policy

Retention schedule

Safeguarding

Confidentiality

Child protection

Computer use

3. Procedures

3.1 Clinical Service Users

Referrals

Information recorded at the point of referral is held securely in a locked filing cabinet, in a locked room in 13 Sydenham Road, Bristol, BS6 5SH ('the office'). Staff are careful to take an appropriate amount of information from referrers. Referrers are told the following:

'Any personal details we record about you will be held securely and should your referral not proceed then they will be destroyed. Should you book an appointment then we will send you a link to our privacy policy. You can view the policy on our website at any time.'

Referrals that don't proceed are destroyed one year after initial contact.

Clients that proceed to appointment

When a client confirms an appointment then a file is made up on a cloud based database, Oasis. This database has two factor authentication and is very secure with GDPR compliance built in. Therapist notes are recorded on this database along with any other information or correspondence related to the case.

Appointment letter paragraph:

'We keep personal data about you / your family in order to provide services to you. This information is kept securely and is never passed to a third party without your permission except in specific exceptional circumstances. We destroy these records 6 years after you finish working with us. Full details of our privacy statement can be found here: [\(link to website file\)](#)'

Client records are held for 6 years after the date that they were discharged from the service. Paper records are destroyed by a registered confidential waste disposal company. Database records are anonymized.

Messages

Phone messages are to be taken down in the message book in a non detailed way. The message book is securely destroyed one a year. Email messages are kept for 6 years and then deleted. Sensitive emails about a case are added to the case file and then deleted.

Employees and Job Applicants

When someone applies for a job then their details are held securely for the purposes of managing their application. Personal information about unsuccessful candidates not shortlisted for interview will be held for 6 months after the recruitment exercise has been completed, it will then be destroyed or deleted. Personal information for those that attended interview but not successful is held 12 months after and then destroyed. Once a person has taken up employment with the Bridge Foundation, we will compile a file relating to their employment. The information contained in this will be kept securely and will only be used for purposes directly relevant to that person's employment. Once their employment with the Bridge Foundation has ended, we will retain the file for 6 years and then destroy it.

Mailing lists

We hold the contact details of people that are interested in Bridge Foundation events and have given us consent to contact them about these events. The list is held securely on our systems and on Mailchimp (see Appendix 1 for their privacy policy). Anyone attending an event but not giving us permission to retain their data is 'forgotten' 12 months after the event.

Data Breaches

Please see the separate Breach Policy for detailed procedures of what to do in the event of a data breach.

3.2 Roles and responsibilities

Privacy is the responsibility of anyone connected with The Bridge Foundation. Certain staff have particular responsibilities in relation to Data Protection.

Data Protection Officer: Frances Fox, Director.

4. Guidance

Up to date guidance on policy and procedure can be found from the Information Commissioner's Office:
<https://ico.org.uk/>

5. Training

Staff training is provided on an ongoing basis.

Privacy Statement

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Your Privacy

1. Visitors to our website

When someone visits bridgefoundation.org.uk we use cookies to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various sections of the site. We collect this information in a way which does not identify any individuals. Therefore you can access all pages on this site without telling us who you are and without revealing any personal information about yourself.

You can set your browser not to accept cookies though some of our website features may not work as a result. You can read more information about website cookies here <https://ico.org.uk/for-the-public/online/cookies.aspx>

Personal information we collect

We collect and store personal information voluntarily supplied by any visitors to the website who:

- Sign up to our mailing list
- Book a place on a conference, course or other event
- Make a donation

This information may include your name, your address and your contact details and you will be asked to confirm your consent to this collection before it happens.

How we keep and process this personal information

We keep this personal information in a secure environment and we do not pass it on to third parties outside of The Bridge Foundation. The information you provide will only be used for the purpose(s) stated when it was collected; in association with your ongoing support as a donor, to supply you with the goods or services you have requested and/or to keep you informed about upcoming Bridge Foundation activities and events.

If you have indicated you would like to be kept informed we will send you information about other goods and services we provide or relevant activity that might be of interest. Any communication we send will include details of how you can opt out of future communication from us.

Access to the information we hold about you

If you have any concerns or questions about how we use your personal information gathered from the website, please contact us. You may request a copy of the personal data we hold on you by contacting us. We will require proof of your identity.

2. Clinical Service Users

How we manage your information

Our clinicians and other staff aim to provide you with the highest quality of care at the Bridge Foundation. To do this they need to keep records about you and the services we have provided you with.

We recognise that the nature of the services we offer requires us to collect and keep a lot of personal information about you and we aim to:

- Minimise the amount of information about you we hold, keeping only what is strictly necessary
- Keep it secure and accessible to authorised people only
- Share it only with your knowledge and consent, or when we have safety concerns or are legally obliged to share it
- Keep it only as long as necessary
- Securely dispose of it when it is no longer necessary to keep it

Information we record

When you start using our services we need to collect information about you and then each time you use the service we add to it. Information recorded may include:

- basic details about you, such as address, date of birth, family members' contact details
- records of your sessions at the Bridge Foundation or with staff elsewhere
- information relevant to your continued care from other people who care for you and know you well, such as health professionals, social workers and relatives
- other details and notes about your treatment

As part of providing a professional, safe and efficient service, we may need to share this information. However it won't be shared with anyone else except under the circumstances set out here.

Sharing information

The information held about you will not be shared for any reason, unless:

- you ask us to do so
- we ask and you give us specific permission
- we have safeguarding concerns
- we are permitted by law, for example where public interest overrides the need to keep the information confidential
- we are required to by law, for example where it concerns a criminal investigation

The types of people we may ask you for permission to share information with include your doctors (GP and hospital) and health professionals such as nurses, or social care professionals such as social workers or school staff. It may also include the police or legal representatives. Anyone who receives information from us also has a legal duty to keep this information confidential and will not share it on further, except in certain circumstances.

Your rights

The General Data Protection Regulation (GDPR) gives you certain rights in relation to the data we hold about you

Under the GDPR you can:

- Find out what information we hold about you
- Access a copy of the information we hold about you
- Rectify any inaccurate or incomplete personal data
- Have the right to object to our processing of your personal information
- Ask us to delete or restrict how we use your personal information, but this right is determined by applicable law
- Complain to a regulator if you think we have not complied with data protection laws. You can lodge a complaint with the Information Commissioners Office <https://ico.org.uk/concerns/>

To make a request you need to put the request in writing, please send requests to info@bridgefoundation.org.uk

If we do hold information about you, you can ask us to correct any mistakes by contacting us on the email address above.

Children

We provide services to children. Children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. **Please also see our child protection policy.**

Keeping your records

We retain your records while you use our services and for a period of time afterwards, usually six years. While they are being retained the records are held securely where only authorised staff can access them. Once records no longer need to be held we review them before disposing of them. We then pay a disposal service to take them away and securely destroy them.

Research

During the course of therapy you will be asked to complete clinical questionnaires which are part of the therapy. Your responses to the clinical measures can also alert your clinician about issues that may need to be talked about in therapy (such as distressing thoughts or actions).

We have a legitimate interest in research which shows the benefits of therapy to funders or to further develop our services. Your responses to the clinical measures may be used as part of a class of service user data and would not be used in any way that identifies you as an individual. The answers you give on your questionnaires are entered into a research database along with those from all the other people that have used our clinical services. We do not record your names on this database. We do statistical analyses on this large dataset to see how well we are doing on average. You have the right to ask that your data is removed from this dataset, if you wish.

In summary

We use your information to provide you with an effective and appropriate service, so we aim to keep your information accurate, up to date and secure.

3. People who telephone us

When you call us, we may record your name and number to pass it on to the appropriate person. If you don't use one of our services or book an event etc. then this information will be destroyed.

4. People who email us

Any email sent to us, including any attachments, may be monitored. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

5. People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about and to those involved in the investigation. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for six years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

6. Job applicants, current and former employees and volunteers

When individuals apply to work at the Bridge Foundation, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the [Disclosure and Barring Service](#) we will not do so without informing them beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates not shortlisted for interview will be held for 6 months after the recruitment exercise has been completed, it will then be destroyed or deleted. Personal information for those that attended interview but not successful is held 6 months after and then destroyed. Once a person has taken up employment with the Bridge Foundation, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with the Bridge Foundation has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

7. Students

The details of people who are enrolled on a course of study and following completion of the programme of study, for the requisite period of time as set out in the Bridge Foundation retention schedule.

8. Conference Attendees and Mailing List

The details of people registering for attendance at one of our Conference or externally-advertised events are held in the same manner as for students. If registrants opt in to receive future communications from us about events then their contact information is held on our contact database and Mailchimp (see Appendix 1 for privacy policy). You can ask for your details to be deleted at any time. Information will not be shared with any third party, unless with the express permission of the subject.

9. Financial information

We use third party payment services such as Paypal and Gocardless and Ticketsource for booking events. We also use Quickbooks for recording accounting information and producing invoices and receipts. All of these companies have their own privacy policies and we would advise that you read these for further information. (see appendix 1).

Appendix 1

Privacy policies of third parties

Mailchimp - <https://mailchimp.com/legal/privacy/>

Wordpress – <https://wordpress.org/about/privacy/>

Quickbooks – <https://quickbooks.intuit.com/uk/privacy-policy/>

Paypal – <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

GoCardless – <https://gocardless.com/legal/privacy/>

Ticketsource – <https://www.ticketsource.co.uk/kb/terms-of-use/privacy-policy>

Oasis – <https://www.itworks.co.uk/wp-content/uploads/2014/01/Privacy-and-Cookie-Policy.pdf>