



Together Bristol

Registered Office: 702 Southmead Road, Filton

Telephone Number : 07903809081

Website: <https://www.together-bristol.co.uk/>

Business Location : TBD

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Named Safeguarding Lead	Amy Jones Director
Named Dep Safeguarding Lead	Bethany Stayings Director
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Signed	A.R Jones

Together Bristol – Data Protection Policy

Version: 1

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TABLE OF CONTENTS

1. Policy Statement
 2. Who is Covered by this Policy?
 3. Who is Responsible for this Policy?
 4. Definition of Data Protection Terms
 5. Data Protection Principles
 6. Fairness and Lawfulness
 7. Transparency
 8. Purpose Limitation
 9. Data Minimisation
 10. Accuracy
 11. Storage Limitation
 12. Security, Integrity and Confidentiality
 13. Transfer Limitation
 14. Data Subject's Rights and Requests
 15. Automated Processing and Decision-Making
 16. Direct Marketing
 17. Breach Notification
 18. Training
 19. Records
 20. Monitoring and Review
-

1. POLICY STATEMENT

1.1

Together Bristol recognises that everyone has rights regarding how their personal data is handled.

1.2

As part of our activities, we collect, store and process personal data relating to staff, members, families, customers, suppliers and other individuals. We are committed to handling this data appropriately and lawfully.

1.3

Personal data may include details of current, past and prospective staff, members, service users and others we communicate with. This data may be held electronically or in paper format.

1.4

All personal data is protected under the UK General Data Protection Regulation (UK GDPR) and other relevant legislation, which place strict requirements on how such data is used.

1.5

Together Bristol is committed to ensuring that all personal data is processed in line with legal requirements and that all staff adhere to this policy.

1.6

Where third parties process data on our behalf, we will ensure they implement appropriate safeguards.

1.7

This policy outlines the legal conditions and organisational expectations for collecting, handling, storing, sharing and disposing of personal data.

1.8

Any concerns about how personal data is handled should be raised with a manager, Director, or the designated Privacy Lead.

1.9

This policy does not form part of any contract of employment and may be amended at any time.

1.10

Breaches of this policy may result in disciplinary action.

2. WHO IS COVERED BY THIS POLICY?

2.1

This policy applies to:

- Employees
- Directors
- Volunteers
- Agency staff
- Contractors

2.2

Third parties working with Together Bristol must also comply with this policy.

2.3

All individuals covered are referred to as “**staff**” within this document.

3. WHO IS RESPONSIBLE FOR THIS POLICY?

3.1

Together Bristol will appoint a **Privacy Lead** responsible for overseeing compliance with this policy and UK GDPR.

3.2

Managers are responsible for:

- Supporting compliance
- Ensuring staff understand their responsibilities

3.3

All staff are responsible for:

- Understanding this policy
- Handling data securely
- Reporting concerns

3.4

Directors hold overall accountability for data protection within Together Bristol.

4. DEFINITION OF DATA PROTECTION TERMS

- **Personal Data:** Information identifying a person (e.g. name, address, DOB)
 - **Data Subject:** The individual the data relates to
 - **Data Controller:** Together Bristol (determines how data is used)
 - **Data Processor:** Third parties processing data on our behalf
 - **Processing:** Any use of data (collecting, storing, sharing, deleting)
 - **Special Category Data:** Sensitive data (health, ethnicity, religion, etc.)
 - **Criminal Offence Data:** Data relating to criminal records
 - **Data Breach:** Loss, misuse, or unauthorised access to data
-

5. DATA PROTECTION PRINCIPLES

Personal data must be:

- a) Processed lawfully, fairly and transparently
- b) Used for specific, legitimate purposes
- c) Limited to what is necessary
- d) Accurate and up to date
- e) Kept only as long as necessary
- f) Secure and protected
- g) Not transferred without safeguards
- h) Processed in line with individuals' rights

Together Bristol is accountable for demonstrating compliance.

6. FAIRNESS AND LAWFULNESS

6.1

Data will only be processed where lawful, including:

- Contractual necessity

- Legal obligation
- Legitimate interests
- Consent
- Vital interests
- Public task

6.2

Consent must be:

- Freely given
- Informed
- Withdrawable

6.3

Special category data will only be processed where additional legal conditions are met.

7. TRANSPARENCY

7.1

Together Bristol will provide clear Privacy Notices explaining:

- What data is collected
 - Why it is used
 - Legal basis
 - Who it is shared with
 - How long it is kept
-

8. PURPOSE LIMITATION

8.1

Data will only be used for the purpose it was collected.

8.2

If the purpose changes, individuals will be informed.

9. DATA MINIMISATION

9.1

Only necessary data will be collected and processed.

10. ACCURACY

10.1

Data must be accurate and kept up to date.

10.2

Incorrect data will be corrected or deleted.

11. STORAGE LIMITATION

11.1

Data will only be kept as long as necessary.

11.2

Data will be securely destroyed when no longer required.

12. SECURITY, INTEGRITY AND CONFIDENTIALITY

12.1

Together Bristol will implement appropriate safeguards, including:

- Secure storage
- Password protection

- Access controls

12.2

Data must remain:

- **Confidential** (only accessed by authorised people)
- **Accurate**
- **Available when needed**

12.3

Failure to follow security procedures may result in disciplinary action.

13. TRANSFER LIMITATION

13.1

Data will not be transferred outside the UK unless:

- Adequate protection is in place
 - Legal safeguards exist
 - Consent is obtained
-

14. DATA SUBJECT'S RIGHTS

Individuals have the right to:

- Access their data
- Correct inaccuracies
- Request deletion
- Restrict processing
- Data portability
- Object to processing
- Withdraw consent
- Be informed of breaches
- Complain to the ICO

14.1

Requests must be made in writing and passed to management immediately.

15. AUTOMATED PROCESSING

15.1

Together Bristol will ensure safeguards are in place for:

- Profiling
 - Automated decisions
-

16. DIRECT MARKETING

16.1

All marketing will comply with privacy laws.

17. BREACH NOTIFICATION

17.1

Data breaches will be reported to the ICO within 72 hours where required.

17.2

Individuals will be informed if risk is high.

17.3

Staff must report suspected breaches immediately.

18. TRAINING

18.1

All staff will receive data protection training at induction.

18.2

Ongoing training will be provided.

19. RECORDS

19.1

Together Bristol will maintain records of all data processing activities.

20. MONITORING AND REVIEW

20.1

This policy will be reviewed regularly to ensure compliance and effectiveness.