

## **DATA PROTECTION POLICY**

### **Neuro Gateway Support Network**

---

#### **1. Introduction and Statement of Commitment**

*Neuro Gateway Support Network* is committed to protecting the privacy, dignity, and rights of all individuals whose personal data is processed in the course of its activities. The organisation recognises that trust is fundamental to its work and that individuals seeking support often in complex, sensitive, and emotionally challenging circumstances must have confidence that their personal information is handled responsibly, securely, and in accordance with the law.

In delivering guidance and support to individuals affected by dementia, Alzheimer's disease, Parkinson's disease, and other neurological conditions, the organisation may process personal data, including sensitive information relating to health, wellbeing, and personal circumstances. The organisation acknowledges its duty to ensure that such data is processed lawfully, fairly, and transparently, and that appropriate safeguards are in place to prevent misuse, loss, or unauthorised access.

This policy establishes the framework through which *Neuro Gateway Support Network* complies with its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and demonstrates its commitment to best practice in data protection and information governance.

---

#### **2. Legal and Regulatory Framework**

This policy is underpinned by the legal requirements set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which together form the core data protection framework within the United Kingdom. The organisation also operates in accordance with relevant guidance issued by the Information Commissioner's Office (ICO), which is the UK's independent authority for upholding information rights. In addition, the organisation recognises the relevance of the Human Rights Act 1998, particularly Article 8, which provides individuals with the right to respect for private and family life. Where applicable, the organisation will also consider the Privacy and Electronic Communications Regulations (PECR) in relation to electronic communications.

---

#### **3. Scope and Application of the Policy**

This policy applies to all individuals acting on behalf of *Neuro Gateway Support Network*, including trustees, volunteers, and any other persons engaged in the delivery of services or administration of the organisation.

The policy applies to all personal data processed by the organisation, regardless of the format in which it is held. This includes digital records, written documentation, emails, telephone records, and any other medium through which personal data may be stored or transmitted. The policy covers all stages of data handling, including collection, recording, storage, use, sharing, and disposal.

---

#### **4. Definitions and Categories of Data**

For the purposes of this policy, personal data refers to any information relating to an identified or identifiable individual. This may include names, contact details, and any other information that can be used to identify a person either directly or indirectly.

The organisation also recognises that it may process special category data, which includes information that is particularly sensitive in nature. This may include details relating to an individual's physical or mental health, care needs, safeguarding concerns, or other personal circumstances. Such data requires a higher level of protection under data protection law. Processing refers to any operation performed on personal data, including collection, recording, organisation, storage, adaptation, retrieval, consultation, use, disclosure, or destruction.

---

## **5. Data Protection Principles**

*Neuro Gateway Support Network* adheres to the core principles of data protection as set out in UK GDPR. These principles form the foundation of the organisation's approach to handling personal data and guide all related activities.

Personal data will be processed lawfully, fairly, and in a transparent manner. Individuals will be informed about how their data is used, and processing will only take place where there is a valid legal basis.

Data will be collected for specified, explicit, and legitimate purposes and will not be used in ways that are incompatible with those purposes. The organisation will ensure that only the minimum amount of data necessary is collected and processed, in line with the principle of data minimisation.

All reasonable steps will be taken to ensure that personal data is accurate and kept up to date. Data will not be retained for longer than necessary and will be securely deleted or destroyed when it is no longer required.

Appropriate technical and organisational measures will be implemented to ensure the security of personal data, protecting it against unauthorised or unlawful processing, accidental loss, destruction, or damage.

The organisation accepts responsibility for demonstrating compliance with these principles and will maintain appropriate records and processes to support accountability.

---

## **6. Lawful Basis for Processing**

The organisation processes personal data on the basis of lawful grounds as defined by UK GDPR. In most cases, personal data will be processed on the basis of legitimate interests, where such processing is necessary to provide guidance and support services to individuals and families.

In some circumstances, processing may be based on consent, particularly where individuals voluntarily provide information or request specific support. Where consent is relied upon, it will be obtained freely, informed, and capable of being withdrawn at any time.

The organisation may also process personal data where it is necessary to comply with a legal obligation, such as responding to safeguarding concerns or cooperating with statutory authorities.

Where special category data is processed, this will be done either with explicit consent or under conditions of substantial public interest, particularly where safeguarding or protection of individuals is involved.

---

## **7. Collection and Use of Personal Data**

Personal data is collected directly from individuals through interactions such as telephone calls, email correspondence, online forms, or support sessions. In some cases, information

may be provided by third parties, such as family members or referring organisations, where appropriate and lawful.

The organisation uses personal data solely for purposes that are consistent with its charitable objectives. This includes providing guidance and support, understanding individual circumstances, signposting to appropriate services, maintaining accurate records, and responding to safeguarding concerns.

Personal data is not used for marketing or commercial purposes, and the organisation does not sell or share data for financial gain.

---

## **8. Data Sharing and Disclosure**

*Neuro Gateway Support Network* recognises that there may be circumstances in which it is necessary to share personal data with third parties. Such sharing will only take place where it is lawful, necessary, and proportionate.

Information may be shared with statutory agencies such as local authorities, health services, or safeguarding teams where this is required to protect an individual or respond to a concern. Wherever possible, individuals will be informed and their consent sought prior to sharing information.

However, the organisation acknowledges that there are situations in which information may be shared without consent, particularly where there is a risk of harm or where disclosure is required by law. In such cases, decisions will be made carefully, with due regard to legal obligations and the safety and wellbeing of the individual.

---

## **9. Data Security and Storage**

The organisation is committed to ensuring that personal data is stored securely and protected against unauthorised access or misuse. Appropriate measures will be implemented to safeguard both electronic and physical records.

Electronic data will be stored on secure systems with password protection and access controls. Physical records will be kept in secure locations with restricted access. Only authorised individuals will have access to personal data, and access will be limited to what is necessary for the performance of their role.

The organisation will regularly review its security measures to ensure they remain effective and appropriate.

---

## **10. Data Retention and Disposal**

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected. The organisation will establish appropriate retention periods based on the nature of the data and legal or operational requirements.

Once data is no longer required, it will be securely deleted or destroyed in a manner that ensures confidentiality is maintained. Electronic data will be permanently removed from systems, and physical records will be securely shredded or otherwise disposed of.

---

## **11. Individual Rights**

Individuals whose data is processed by the organisation have a number of rights under UK GDPR. These include the right to access their personal data, request correction of inaccurate information, request deletion where appropriate, and object to or restrict processing in certain circumstances.

The organisation is committed to upholding these rights and will respond to requests in a timely and transparent manner, in accordance with legal requirements. Requests will typically be responded to within one calendar month.

---

## **12. Data Breaches**

A data breach is any incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. The organisation takes all data breaches seriously and will respond promptly to any such incidents.

In the event of a breach, the organisation will assess the nature and severity of the incident and take appropriate action to mitigate any risks. Where required, the breach will be reported to the Information Commissioner's Office within 72 hours. Affected individuals will also be informed where there is a high risk to their rights and freedoms.

All breaches will be documented, and lessons learned will be used to improve data protection practices.

---

## **13. Responsibilities and Governance**

The trustees of *Neuro Gateway Support Network* have overall responsibility for ensuring that the organisation complies with data protection law and maintains high standards of information governance.

A designated Data Protection Lead will be appointed to oversee compliance, manage data protection processes, respond to requests, and handle any breaches or concerns. All individuals acting on behalf of the organisation are responsible for adhering to this policy and protecting personal data in their day to day activities.

---

## **14. Confidentiality and Professional Conduct**

All personal data handled by the organisation is treated as confidential. Individuals must ensure that information is not disclosed inappropriately, discussed outside of professional contexts, or accessed without proper authorisation.

Maintaining confidentiality is essential to protecting the trust of those who engage with the organisation and ensuring compliance with legal and ethical standards.

---

## **15. Training and Awareness**

The organisation is committed to promoting awareness of data protection responsibilities among all individuals involved in its work. Trustees and volunteers will be expected to familiarise themselves with this policy and understand their role in maintaining data security and confidentiality.

---

## **16. Policy Review**

This policy will be reviewed on an annual basis, or sooner if there are changes in legislation, regulatory guidance, or organisational practice. The review process will ensure that the policy remains accurate, effective, and aligned with current legal requirements.

---

## **17. Data Protection Lead**

Name: Caitlin Roberts

Role: Data Protection Lead

Contact Details: [Caitlin.roberts@neurogatewaysupportnetwork.org](mailto:Caitlin.roberts@neurogatewaysupportnetwork.org)

---

### **17. Final Statement**

*Neuro Gateway Support Network* is committed to maintaining the highest standards of data protection and information governance. The organisation recognises that the responsible handling of personal data is fundamental to its mission and to the trust placed in it by the individuals and families it supports.

All personal data will be processed with integrity, respect, and in full compliance with the law.