

Bevan Community Benefit Society

Organisational Privacy Notice

Approval Date: 15th November 2025

Review Date: 15th November 2026

This policy should be reviewed annually, or earlier if changes in policy occur.

1. Introduction

Bevan Community Benefit Society (“Bevan”, “we”, “us”) is committed to protecting your privacy and the security of your personal information. This privacy notice explains how we use, share, and protect your data across all our services and sites, including:

- Inclusion health services for vulnerable communities (e.g., people experiencing homelessness, refugees, asylum seekers)
- Neurodiversity services, including the Brainhealth Adult ADHD assessment and treatment service
- Other regulated and community health and wellbeing services

Please read this notice carefully, as it contains important information about your rights and our responsibilities.

2. Who We Are (Data Controller)

Name: Bevan Community Benefit Society

Address: 14 Piccadilly, Bradford BD1 3LS

Phone: 01274 322400

Contact Us: <https://www.wearebevan.co.uk/contact-us-form/>

Bevan is registered with the Information Commissioner’s Office as a Data Controller (Registration No: ZB532222). [View our registration](#)

3. Data Protection Officer

Our Data Protection Officer (DPO) is responsible for monitoring our compliance with data protection requirements.

	Bradford	Leeds
Data Protection Officer	Daljeet Sharry-Khan	Aaron Linden
Email address	Daljeet.Sharry-Khan@nhs.net	Leedsccg.dpo@nhs.net
Telephone	07395796639	0113 2217321

4. Why We Collect Your Information

We collect and process personal information to provide high-quality health, care, and support services, manage our operations, comply with legal obligations, and improve our services. This includes information you provide directly, information from consultations, and information shared by other organisations involved in your care.

5. What Information We Collect

Depending on the service you use, we may collect:

- **Personal identifiers:** Name, address, contact details, NHS number, date of birth, next of kin, etc.
- **Health and care information:** Appointments, diagnoses, treatment, allergies, test results, notes from healthcare professionals.
- **Special category data:** Health, ethnicity, sexual orientation, religious beliefs, genetic data, criminal offence data (where relevant).
- **Service-specific data:**
 - For inclusion health: housing status, support needs, safeguarding information
 - For residential children's homes: care plans, education and social care information
 - For neurodiversity/Brainhealth: assessment results, reports, medication history, consent preferences for sharing with NHS GPs [\[Privacy Po...rainhealth | Word\]](#)

- **Other:** Information from family/carers, employment data (for staff), CCTV, call recordings, and communications.
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6. How We Use Your Information

- To provide and manage your care and treatment across all Bevan services.
 - To manage our services, audit quality, investigate complaints, and comply with legal requirements.
 - For research, planning, and commissioning (usually in anonymised or pseudonymised form).
 - For safeguarding, life or death situations, and other circumstances where sharing is required by law.
 - For staff administration, recruitment, and employment purposes.
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7. Lawful Basis for Processing

We process your data under the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

- **Personal data:**
 - Consent (Article 6(1)(a))
 - Contract (Article 6(1)(b))
 - Legal obligation (Article 6(1)(c))
 - Vital interests (Article 6(1)(d))
 - Public task (Article 6(1)(e))
- **Special category data:**
 - Explicit consent (Article 9(2)(a))
 - Employment, social security, social protection (Article 9(2)(b))
 - Vital interests (Article 9(2)(c))
 - Legal claims (Article 9(2)(f))
 - Substantial public interest (Article 9(2)(g))
 - Health or social care (Article 9(2)(h))

- Public health (Article 9(2)(i))

We also comply with the common law duty of confidentiality.

8. Who We Share Information With

- NHS Trusts, hospitals, GPs, and other health and care providers.
- NHS Digital, Integrated Care Boards, local authorities, social care, and public health.
- Third-party data processors (e.g., IT suppliers, communication providers).
- Regulatory bodies, courts, and law enforcement (where required).
- Research and audit bodies (in anonymised/pseudonymised form).
- Staff data may be shared with regulatory bodies, auditors, and government agencies as required.
- For Brainhealth and neurodiversity services, information may be shared with your NHS GP if you consent (or unless you opt out).

We only share the minimum necessary information and always with appropriate safeguards.

9. International Transfers

We do not routinely transfer personal data outside the UK/EU. If we do, we ensure equivalent data protection standards are met.

10. How We Protect Your Information

- Data is stored securely on UK-based servers and in locked facilities.
 - Access is restricted to authorised staff.
 - All staff receive regular data protection training.
 - We comply with the NHS Data Security and Protection Toolkit and the Records Management Code of Practice.
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11. How Long We Keep Your Information

Records are retained and destroyed in accordance with the NHS Records Management Code of Practice. We do not keep data longer than necessary.

12. Your Data Protection Rights

You have rights under the UK GDPR, including:

- To be informed about how your data is used.
- To access your data (Subject Access Request).
- To rectify inaccurate data.
- To erase data (in limited circumstances).
- To restrict or object to processing (in certain cases).
- To data portability (where applicable).
- To object to automated decision-making and profiling.

Some rights may not apply in all circumstances (e.g., where processing is required by law).

13. National Data Opt-Out

You can choose to opt out of your confidential patient information being used for research and planning.

Find out more or opt out

14. How to Complain

If you have concerns about our use of your personal information, please contact us at:

Email: complaints@bevancbs.org.uk

If you remain dissatisfied, you can contact the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113

<https://www.ico.org.uk/>

15. Updates to This Notice

We may update this privacy notice from time to time. The latest version will always be available on our website.
