



Data Protection Policy

How we collect, use, protect and delete personal information, in line with UK GDPR.

Document	2.3 Data Protection Policy
Organisation	Brick's Foundation for Autism Inclusion - In Loving Memory of Lucca Lacerda Tavares
Legal structure	Charitable Incorporated Organisation (CIO), Foundation model, principal office in England
Charity number	Registration with the Charity Commission for England and Wales in progress
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Approved by	Board of Trustees
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Document owner	Board of Trustees
Next review	21 October 2027, or earlier after a serious incident or a significant change in activities
Published	Yes, on bricksfoundation.co.uk

1. Purpose

This policy explains how Brick's Foundation looks after personal information, in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Our public Privacy Policy, on bricksfoundation.co.uk/privacy.html, explains the same in short form for visitors.

2. Who is responsible

- Brick's Foundation is the **data controller** for the personal information it collects.
- **Data Protection Lead:** Aloisio Tavares, aloisio.tavares@bricksfoundation.co.uk. He handles requests and questions and reports breaches to the Board.
- Every trustee and volunteer must follow this policy.

3. What we collect and why

Source	Information	Purpose and lawful basis
Volunteer form	Name, email, country, how they would like to help, message	To reply and organise volunteering. Legitimate interests.
Share your story	Chosen name, email, who they are, country, story	To consider publishing the story. Consent.

Source	Information	Purpose and lawful basis
Lucca's Wall	Name, how they knew Lucca, email, message, photos, videos, PDFs	To publish the post (name, relation, message and files are public straight away). The email is never published; it is kept so the family can reply or deal with a concern. Consent.
Award applications	Organisation details, contact name, email, phone, questionnaire and evidence	To assess the application. Legitimate interests.
Award nominations	Nominator's name and email; nominee's name, role, country and optional email; reasons	To consider the nomination and contact the nominee. Legitimate interests.
Emails and messages	Whatever people send us	To reply. Legitimate interests.
Trustee and volunteer records	Contact details, declarations, checks, training	To run the charity and meet legal duties. Legal obligation and legitimate interests.

We avoid collecting special category data (such as health or diagnosis information). When people choose to share it in a story or post, we use it only with their explicit consent and for the purpose they shared it for.

4. Principles we follow

- Collect only what we need, and use it only for the purpose we explained.
- Keep it accurate, secure and no longer than necessary.
- Never sell personal information or use it for marketing without consent.
- Never publish email addresses.

5. Where data is held, and who processes it for us

Service	What it does
Netlify	Hosts the website, receives form submissions and stores Lucca's Wall posts and files
Google Workspace	Foundation email, calendar and Drive
Google Fonts	Fonts for the website. (Portuguese, Spanish and French are our own translated pages; no cookie is used for language.)
Flag Counter	Counts visitors by country
GitHub	Stores the website's code (no personal data from visitors)

Some of these providers may store data outside the UK. We rely on the safeguards required by UK data protection law.

6. Keeping data secure

- Foundation accounts use strong, unique passwords and two-step verification.
- Personal data is kept in the Foundation's Google Workspace, not in personal email or on personal devices.
- Access is limited to the trustees and volunteers who need it. Safeguarding records have extra restrictions.

- The Lucca's Wall management page is protected by a password known only to the family and the trustees they choose; it is changed if it may have been shared.

7. How long we keep it

Information	How long
Form submissions (volunteer, story, award, nomination)	Deleted within 12 months, unless the person becomes an active volunteer, the story is published or the award is granted
Lucca's Wall posts	Until the poster or the family asks for removal
Published stories and photos	Until the person asks us to remove them
Trustee and volunteer records	While active, then up to 6 years
Safeguarding records	As long as needed for protection and legal purposes; never destroyed during an open concern
Minutes and governance records	Permanently

8. People's rights

Anyone can ask to see, correct or delete their information, object to its use, or withdraw consent, by emailing aloisio.tavares@bricksfoundation.co.uk. We reply within one month. People can also complain to the Information Commissioner's Office (ico.org.uk).

9. Data breaches

If personal data is lost, shared by mistake or accessed by someone who should not have it, tell the Data Protection Lead the same day. He will contain the breach, record it, assess the risk and, where the law requires, report it to the ICO within 72 hours and tell the people affected. Breaches are reported to the Board.

10. Children

We ask anyone under 16 to send stories or messages with the help of a parent or carer. We do not knowingly collect personal data from children without that involvement. Photos of children follow the consent rules in the Safeguarding Policy (2.1).

11. Registration with the ICO

The trustees will check whether the charity must pay the data protection fee to the ICO, or is exempt, and record the decision.

Version history

Version	Date	Approved by	Summary
1.0	21 October 2026	Board of Trustees	First version, written for Brick's Foundation and adopted by the trustees.