



EAST SUSSEX EARLY DAYS CIC PRIVACY POLICY STATEMENT

Contact details

Name: East Sussex Early Days CIC

E-mail: eastsussexearlydays@gmail.com

Website: www.eastsussexearlydays.co.uk

East Sussex Early Days is a Community Interest Company (ESED), run by a group of 6 directors. ESED adheres to the principles of the general data protection regulations and understands best practice for managing information. International Board Certified Lactation Consultants (IBCLCs) are required by the IBCLC Code of Conduct to respect people's right to privacy and confidentiality.

To provide our support effectively and safely in accordance with our agreement for services, we will need to request sensitive personal information from you.

In accordance with General Data Protection Regulations 2018 (GDPR) we are required to inform you what Data we will request from you, how we will process that Data and what your rights are in relation to that Data.

We require your consent for processing your data (the type of personal information that we collect, process and store is listed below) and we will request you to declare you give your explicit consent for us to do so.

The type of personal information we collect

We currently collect and process the following information:

- Name
- Date of Birth
- Address
- Phone number

- Email address
- Partner's name
- Children's name and date of birth
- Medical history (including obstetric and feeding history)
- Consultation notes and emails/messages including plans
- Any photos or videos you have shared with us

How we get the personal information and why we have it

The personal information we collect, process and record about you and your baby is provided to us directly by you and is required for us to provide you with infant/child feeding support. This will be through contact by phone, text, WhatsApp, Messenger, email, via the JotForm page on our website, via social media and face-to-face. We may use your information to contact you at a later date for the purposes of follow up, audit and research. Please note that communication with us via text, messenger and social media may not be secure. If you prefer to use a more secure method then please contact us via email.

In order to provide you with optimal care, with your consent, we may contact your midwife, GP, health visitor or other healthcare professionals involved in your care and share relevant information with them, for example, a summary of any care plan made between you and ESED.

If we were concerned about the safety of your child/ren then we are legally obliged to share our concerns and relevant information with the relevant agencies. In this instance, we would not require your consent. Please see our Safeguarding Policy for further details.

We may use your anonymised data for research, statistics or audits.

Your photos or videos may be used for the purposes of education and for the promotion of breastfeeding and lactation counselling. This will only occur with your consent and you will be provided with a separate consent form in this event.

How we store your personal information

Your information is securely stored. We store your information on paper and electronically. Paper documents are stored securely in a locked filing cabinet and electronically created documents are stored on electronic devices that are password protected and have security software installed; on Google Drive; on email; on the JotForm platform and on encrypted memory sticks that are kept in a locked filing cabinet.

We will retain the record of our IBCLC appointment and relevant correspondence until your child's 25th birthday. This is a requirement of our insurers. We will then dispose of your paper data by shredding and secure disposal. Electronically held data will be disposed of through secure deletion software.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- a. Your consent. You can remove your consent at any time. You can do this by contacting: eastsussexearlydays@gmail.com
- b. We have a contractual obligation.
- c. We have a legal obligation.
- d. We have a vital interest.
- e. We need it to perform a public task.
- f. We have a legitimate interest.

At least one of these must apply whenever ESED processes personal data.

Your data protection rights

Under data protection law, you have rights including:

- Your right of access - you have the right to ask us for copies of your personal information. Your right to rectification - you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - you have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - you have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at eastsussexearlydays@gmail.com if you wish to make a request.

Time limit to respond

We try to respond to all requests within one month.

Data Breaches

If your personal data is breached at any point, we will notify you and any applicable regulator where legally required to do so.

Disclaimer

ESED's suggestions and information are not a substitute for medical advice or treatment. Always seek advice from your doctor or other qualified health care practitioner for issues that may require medical attention or diagnosis, and before following our recommendations.

When you use information provided by ESED, this is solely at your own risk.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at East Sussex Early Days CIC – eastsussexearlydays@gmail.com You can also complain to the Information Commissioner’s Office (ICO) if you are unhappy with how we have used your data.

ICO address:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO
website: <https://www.ico.org.uk>

Date of policy: 10/04/2024
Date for review: 10/04/2026