



The Pavilion,
Kingfisher Way,
Huntingdon,
Cambridgeshire,
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E-mail: info@lymebayleisure.co.uk

Data Protection Policy

Organisation	Lyme Bay Leisure Ltd, Reg. No. 08513325
Scope of Policy	<p>This policy applies to:</p> <ul style="list-style-type: none"> the UK office of Lyme Bay Leisure (LBL); its branches, regions and subsidiaries; all seasonal workers operating on behalf of Lyme Bay Leisure. <p>It applies to paid staff and volunteers.</p>
Policy Operational Date	31st July 2013
Policy Prepared by	Samantha Sinclair, Business Manager
Date Approved by the Board	10th January 2014
Policy Review Date	31st July 2016

Introduction	
Purpose of Policy	<p>The purpose of this policy is to enable LBL to:</p> <ul style="list-style-type: none"> comply with the law in respect of the data it holds about individuals; follow good practice; protect LBL's supporters, staff and other individuals protect the organisation from the consequences of a breach of its responsibilities.
Brief Introduction to Data Protection Act 1998	<p>The Data Protection Act controls how your personal information is used by organisations, businesses or the government.</p> <p>Everyone who is responsible for using data has to follow strict rules called 'data protection principles'. They must make sure the information is:</p> <ul style="list-style-type: none"> used fairly and lawfully used for limited, specifically stated purposes used in a way that is adequate, relevant and not excessive accurate kept for no longer than is absolutely necessary handled according to people's data protection rights kept safe and secure not transferred outside the UK without adequate protection
Personal Data	<p>This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data Protection Act, by virtue of not meeting the strict definition of 'data' in the Act.</p>
Policy Statement	<p>LBL will:</p> <ul style="list-style-type: none"> comply with both the law and good practice respect individuals' rights be open and honest with individuals whose data is held



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	<ul style="list-style-type: none"> provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently <p>LBL recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. In the main this means:</p> <ul style="list-style-type: none"> keeping information securely in the right hands, and holding good quality information. <p>In addition to being open and transparent, LBL will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.</p>
Key Risks	<p>LBL has identified the following potential key risks, which this policy is designed to address:</p> <ul style="list-style-type: none"> Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed

Responsibilities	
Directors	The Board of Directors recognises its overall responsibility for ensuring that LBL complies with its legal obligations
Data Protection Officer	<p>The Data Protection Officer is currently Samantha Sinclair, with the following responsibilities:</p> <ul style="list-style-type: none"> Briefing the board on Data Protection responsibilities Reviewing Data Protection and related policies Advising other staff on Data Protection issues Ensuring that Data Protection induction and training takes place Notification Handling subject access requests Approving unusual or controversial disclosures of personal data <p>Approving contracts with Data Processors</p>
Specific Other Staff	N/A
Team/Department Managers	Each team or department where personal data is handled is responsible for drawing up its own operational procedures (including training and induction) to ensure that good Data Protection practice is established and followed.
Staff and Volunteers	All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.
Enforcement	Significant breaches of this policy will be handled under LBL's disciplinary procedures.

Confidentiality	
Scope	Personal information obtained by LBL will not be used for the benefit of persons not authorised.



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Understanding of Confidentiality	Not to disclose information with people who are out with the organisation. Also only tell people within the organisation on a need to know basis.
Communication with Data Subjects	LBL will have a privacy statement for Data Subjects, setting out how their information will be used. This will be available on request, and a version of this statement will also be used on the LBL web site. (See our privacy and cookie statement).
Communication with Staff and Volunteers	Staff, volunteers and seasonal workers will be required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities.
Authorisation for disclosures not directly related to the reason why data is held	Where anyone within LBL feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done with the authorisation of the Data Protection Officer. All such disclosures will be documented.

Security	
Scope	This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.
Specific Risks	<p>LBL has identified the following risks:</p> <ul style="list-style-type: none"> Information passing between employees could go astray or be misdirected. Staff or volunteers with access to personal information could misuse it.
Security Measures	All information covered under this policy will be password protected.
Business Continuity	This would include backup procedures (both for data and for key staff availability) and emergency planning.
Personal Safety	Lone workers and personal safety of staff

Data Recording and Storage	
Accuracy	<p>LBL will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:</p> <ul style="list-style-type: none"> ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data. Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets. Effective procedures will be in place so that all relevant systems are updated when information about any individual changes. <p>Staff or volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.</p>
Retention Period	Information will be retained either only so long as it is required or if a request is made to remove such information.



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Subject Access	
Responsibility	Any subject access requests will be handled by the Data Protection Officer
Procedure for making request	<p>Subject access requests must be in writing. All staff and volunteers are required to pass on anything which might be a subject access request to the Data Protection Officer without delay.</p> <p>All those making a subject access request will be asked to identify any branches or seasonal workers who may also hold information about them, so that this data can be retrieved.</p>
Provision for verifying identity	The Data Protection Officer will verify the subject access identity prior to handing over any information.
Charging	There is no charge
Process for granting access	The information will be provided for in paper form unless specifically requested for otherwise

Transparency	
Procedure	<p>Data Subjects will generally be informed in the following ways:</p> <ul style="list-style-type: none"> • Staff: in the staff handbook • Members: in the welcome pack • Website users: when they contact LBL via the website

Consent	
Underlying Principles	<p>Consent will normally not be sought for most processing of information about staff, with the following exception;</p> <ul style="list-style-type: none"> • Staff details will only be disclosed for purposes unrelated to their work, for example financial references, with their consent. <p>Information about members and supporters will only be made public with their consent. (This includes photographs.)</p> <p>'Sensitive' data about members and supporters (including health information) will be held only with the knowledge and consent of the individual.</p>
Forms of Consent	Consent for the above matters must be obtained in written form



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Direct Marketing	
Underlying Principles	<p>LBL will treat the following unsolicited direct communication with individuals as marketing:</p> <ul style="list-style-type: none"> • promoting any LBL services; • promoting site specific; • promoting membership to supporters;
Opting Out	<p>Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opt out. If it is not possible to give a range of options, any opt-out which is exercised will apply to all LBL marketing.</p>
Electronic Contact	<p>Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.</p>

Staff training & acceptance of responsibilities	
Documentation	<p>Information for staff is contained in the staff handbook.</p>
Induction	<p>All staff who have access to any kind of personal data will have their responsibilities outlined during their induction procedures.</p> <p>Data Protection will be included in foundation training.</p>
Continuing training	<p>LBL will provide opportunities for staff to explore Data Protection issues through training, team meetings, and supervisions.</p>
Procedure for staff signifying acceptance of policy	<p>Staff will be asked to sign to show they accept the information provided in the staff handbook. Any additional or further training will require a separate signature in acceptance of the policy.</p>