



The Cambrian Community Centre
Caplan Court, 1 Grove Road
Richmond, SURREY
TW10 6SN
Telephone: 020 8948 3351
Web: <http://cambriancentre.org>
Registered Charity No: 1151011

Supporting Health and Community

Data Protection and Privacy Policy

I Statement of Intent

The Cambrian Community Centre (CCC) takes the protection of personal and operational information extremely seriously. In the course of performing its services, and in relation to its employees, trustees, users, hirers and volunteers, it is committed to the seven key principles of the UK GDPR:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Confidentiality, integrity and security
- Accountability

In particular, the CCC will not share any personal data which it stores with any other person or organisation without express permission or unless subject to a legal obligation.

II Confidentiality

- The CCC's employees, trustees, users, volunteers and external partners are responsible for maintaining the confidentiality of all proprietary and privileged information to which they are exposed in respect of both personal data belonging to individuals and the organisational business of the CCC. A breach of this duty of confidentiality could result in the termination of an employee's, trustee's, hirer's or volunteer's relationship with the CCC or other corrective action.
- Any information concerning the CCC's need for or receipt of funding and all matters discussed at board meetings of trustees shall be treated as confidential unless the trustees otherwise agree.
- No information held by the CCC, including an individual's status in the UK Disclosure and Barring Service (DBS), will be shared with a third party without consent.

- The CCC will only disclose any information held about an employee, trustee, user, hirer or volunteer where there is a risk to that person or others, there are concerns about abuse or illegal activity, or help is objectively required that the CCC cannot provide.
- Any publicity materials containing photographs of an individual will only be used with the subject's permission or the permission of his/her guardian where appropriate.
- The CCC cannot, however, be responsible for the theft, destruction, or inadvertent disclosure of personal information whether held electronically or on paper.

III Inventory of personal and confidential information

Annex A contains a high-level inventory of personal and confidential information kept by the CCC.

The personal data, including special category data, falls into three categories:

- Information derived from the Community Activities Programme (CAP) registration form, reproduced at Annex A, which is held on the contacts database (together with contact details of other people who have registered with the Centre). This information is used to inform CCC users about activities in the Centre
- Information about gym users, including contact details, held on the gym computer
- Information about gym users collected on the paper health questionnaire shown in Annex B, completed prior to initial assessment.

The inventory shall be reviewed and updated as necessary and, in any event, annually.

IV Privacy

The Privacy Notice concerning the personal information of Centre Users is available on the CCC's website at <https://cambriancentre.org/about/policies/>

V Use of Data

The CCC may use personal, confidential and other information legitimately in its possession to:

- Carry out its obligations arising from any contracts entered into with the Centre
- Process invoices for bookings
- Seek users' views or comments on the services provided
- Notify users of any changes to services

- Send users and local residents newsletters and communications which may be of interest (e.g. new initiatives)
- Process any donations.

VI Responsibility

Responsibility for data protection and privacy lies with the Centre Manager supported by the trustees and staff. A nominated trustee shall have specific responsibility for data protection for the CCC and the trustees undertake to review this policy annually.

Based on the criteria published by the Information Commissioner Office (ICO), the Centre is not required to register with the ICO or to nominate a Data Protection Officer.

VII Lawful basis for collection and processing of personal information

The primary lawful basis for collection and processing of personal information shall be consent. Alternatively, processing of personal data is necessary for performance of the contract we have with users, trustees and staff to provide services in which the data subject wishes to participate. The CCC's lawful basis for processing special category data is normally that the CCC user has freely given informed consent to the processing for purposes explained to them before the data is given, namely for keeping them fit and safe and for the creation of beneficial exercise and treatment programmes.

VIII Secure and safe storage of information

Personal information of CCC users, trustees and staff held in electronic formats and confidential management information in electronic formats shall be:

- Stored in encrypted format on the CCC's computer equipment
- Transferred to an external data centre, if required, using the SSL/TLS protocol. Only data centres meeting the standard ISO 27001 on information security management will be used. The suppliers in 2023 were Inventive Hosting, a trading name of the UK company Praetorian IT Services Ltd, and Microsoft Ireland Operations Ltd.
- The paper medical questionnaires of gym users (Annex B) shall be kept in locked cupboards. Card data containing exercise programmes accessible by gym users will not contain any health information.

IX Data subject access requests

The Centre Manager has primary responsibility for managing any Data Subject Access Requests (DSARs).

Each DSAR will be recorded in a log noting:

- The identity of the subject
- Their contact details
- The date of the request
- The nature of the request – data from the contacts database or information held about gym users
- How the request was fulfilled – e.g. paper copy provided by post
- Date that the information was provided (in accordance with statutory deadlines)
- Notes on any follow up e.g. request to amend specific data or to delete the record and when this was done.

X Data update and retention periods

We discourage the retention of data for any longer than is reasonably required.

In the gym database, records of gym users who have not used the gym for in excess of three months will be dated and transferred to an archive folder. These records will be managed as follows:

- If the user subsequently visits the gym, the record will be restored to the folder of active gym users
- Records which remain in the archive folder for four years shall be deleted
- Personal information for gym users shall be deleted four years after a person has ceased to be an active gym user. Any personal information held on paper that is no longer required shall be shredded.

XI Accountability and compliance

The Centre Manager, supported by the trustees, will provide a short annual report on the application of the data protection and privacy procedures for the Trustees.

The Centre Manager and staff shall endeavour to monitor data protection and privacy procedures. A breach is any event that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to personal data.

The Centre Manager shall report without delay all suspected breaches to the Trustees for assessment and decisions on further action by email as soon as he/she becomes aware of them. The report shall include:

- The number of individuals affected
- The nature and content of the personal information concerned
- The steps taken to contain the breach, mitigate its effects and prevent a recurrence

When a personal data breach has occurred, we will establish the likelihood and severity of the resulting risk to people's rights and freedoms. To do this, we will use the tool on the ICO's website: [UK GDPR data breach reporting \(DPA 2018\) | ICO](#) and, where appropriate, notify the ICO. Where a breach must be reported, UK GDPR stipulates that this must be done within 72 hours.

In addition, if a breach is likely to result in a high risk to the rights and freedoms of individuals, we must inform the individuals concerned (the data subjects) directly and without undue delay. The threshold for informing individuals is higher than for informing the ICO.

XII New activity or service planning

When planning any new activity or service, the data protection requirements will be an integral part of planning by the Centre Manager and trustees and shall be based on the Privacy Notice and these procedures. It may be appropriate to carry out a Data Protection Impact Assessment, according to ICO guidance: [Data Protection Impact Assessments \(DPIAs\) | ICO](#).

Reviewed October 2023

Annex A – High-Level Inventory of personal data and confidential information

- 1) Personal Information obtained from the CAP signup form. Very few records have all fields completed.
- 2) The gym database held on the gym computer, which contains:
 - Name, data of birth, date of joining and contact information
 - Information on gym attendance
- 3) The completed health questionnaire from the Initial Assessments retained in paper form.
- 4) Personal information in the Centre's contact database held in electronic format. This contains name, address, phone number and email addresses gathered from the CAP signup forms and gym health questionnaire.
- 5) The CCC also treats all the information held in the trustee library as confidential information, including but not limited to:
 - Policy papers prepared for meeting of the Trustees
 - Matters discussed at meeting of the Trustees
 - Minutes of Trustee meetings
 - All matters concerning fund raising, including the need for funds, sources of funds, funding applications and directly related matters.

Copies of the CAP signup form and health questionnaire are appended to this policy in Annex B.

Cambrian Community Centre Activity Sign Up Form



Please complete the form and hand it to the activity leader or scan and email it to manager@cambriancentre.org The information is needed to help us understand users of the Centre and to measure what we deliver.

Name of activity	
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Personal Details:

First Name		Family Name	
Date of Birth <i>(DD/MM/YY)</i>			
Gender <i>(M/F/Non-binary)</i>			
Ethnicity <i>(see guidance below)*</i>			
Address (inc postcode)			
Contact Tel			
Emergency Tel			

Email			
Do you consider yourself to have a disability?		Are you a blue badge holder?	

Health Information: *(only complete for Yoga and other physical activities)*

Medical conditions (e.g. heart/lung problems, diabetes, blood pressure, arthritis/rheumatism, depression, anxiety)?	
Previous surgery (e.g. hip replacement)?	
Medication?	
Previous injuries?	
Are you pregnant or have you given birth in the last 12 months?	
Any other relevant health issues?	

(*Guidance on ethnicity: please use high level categories from the census: 1. White; 2. Asian / British Asian; 3. Black, Black British, Caribbean or African; 4. Mixed / Multiple; 5. Other or 6. Prefer not to say.)

Please continue on over the page

Your aims:

What would you like to gain/achieve from the activity you have signed up to?

Do you have any prior experience (please specify)

Any further comments/suggestions?

Personal information policy:

1. We use your information to help keep you healthy, safe and informed.
2. We store your information securely and keep it only as long as is necessary
3. We do not share your information with anyone else
4. You can look at your information at any time and tell us if it is not up-to-date
5. You can opt out of the distribution list for our occasional newsletters whenever you want (see below).

By signing this form, you are giving us consent to hold this information.

You can see our full Privacy Notice at <https://CambrianCentre.org/privacy-policy> or ask the Manager for a copy.

Communications: We use email to advise you of important information, for example an unexpected session cancellation, and also occasionally send out news about the Centre and our events. Your email address will not be given to third parties. It helps us if you can supply an email address and agree to our using it.

Please tick the box to agree that we may communicate by email:

(Note: You can withdraw this consent at any time if you wish)

I herewith confirm that the information supplied above is accurate and that I agree to enter into any exercise programme entirely at my own risk. If any medical conditions or medication changes, I will inform the activity leader.

Signed:

Date:

Annex B – Health questionnaire used for initial assessment of new gym users



<u>Office Use:</u>
User No: _____
BP: _____

Health Questionnaire

Dr/Mr/Mrs/Ms/Miss

M/F/Non-Binary

Full Name: _____

DOB: _____

Address:

Postcode: _____

Home Tel: _____

Mobile:

Email: _____

Profession:

Emergency Contact Name: _____

Tel:

Emergency

Contact

Relationship

to

Member:

Ethnicity

(see

guidance

below*)

*Guidance on ethnicity: please choose one of the following: 1. White; 2. Asian / British Asian; 3. Black / Afro-Caribbean / Black British; 4. Mixed / Multiple; 5. Other (e.g. Arab) or 6. Prefer not to say.

GP Name/Surgery: _____ **Tel:**

Do you receive Universal Credit / Pension Credit / Other benefit?

Smoker: Yes No **Amount Daily:** _____

Exercise Level: None Occasional Regular

Type of Exercise:

Have you ever been diagnosed with any of the following medical conditions? *please tick*

- | | |
|---|---|
| <input type="checkbox"/> Heart Disorder | <input type="checkbox"/> Weight Management |
| <input type="checkbox"/> Hypertension (High Blood Pressure) | <input type="checkbox"/> High Cholesterol |
| <input type="checkbox"/> Diabetes Type 1/ Type 2 | <input type="checkbox"/> Osteoporosis |
| <input type="checkbox"/> Osteoarthritis | <input type="checkbox"/> Rheumatoid Arthritis |
| <input type="checkbox"/> Asthma/ COPD | <input type="checkbox"/> Low Back Pain |
| <input type="checkbox"/> Depression/Anxiety | <input type="checkbox"/> Poor Balance/ Mobility |
| <input type="checkbox"/> Neurological | <input type="checkbox"/> Other |

Do you suffer from any of the following?

Headaches

Fainting/Dizziness

Breathlessness

Pain/Tightness in Chest

Are you Pregnant? Yes

No

Trimester: 1/ 2/ 3

Are you prescribed any regular medication: Yes *please specify below* No

Previous Medical History (Illnesses/Operations) *please explain medical conditions ticked above:*

Do you consider yourself to have a disability? Y N

Are there any known reasons why you should not follow an activity programme?

Y N

Personal information:

1. We use your information to help keep you fit, safe and informed.
2. We store your information securely and keep it only as long as is necessary
3. We do not share your information with anyone else
4. You can look at your information at any time and tell us if it is not up-to-date
5. You can opt out of the distribution list for our occasional newsletters whenever you want (see below).

By signing this form, you are giving us consent to hold this information.

You can see our full Privacy Notice at <https://CambrianCentre.org/privacy-policy>

Communications: We use email to advise you of important information, for example an unexpected gym closure, and also occasionally send out news about the Centre and our events. Your email address will not be given to third parties. It helps us if you can supply an email address and agree to our using it.

Please tick the box to agree that we may communicate by email:
(Note: You can withdraw this consent at any time if you wish)

I herewith confirm that the information supplied above is accurate and that I agree to enter into any exercise programme entirely at my own risk. If any medical conditions or medication changes, I will inform a member of the gym staff.

Signed:

Date:

Version [September 2023]