

Privacy Policy

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1. Introduction

Salford Community Leisure Limited (SCLL) is a Community Benefit Society run by and for the people of Salford. We are committed to enhancing the physical and cultural wellbeing of the community through sport, library and cultural opportunities we offer across 40 venues, which attract millions of customer visits each year. Passionate about delivering value for money, we reinvest all our profits because we believe that leisure and culture should be at the heart of every community.

Salford Community Leisure Ltd (SCLL) is committed to ensuring that personal information is held fairly, lawfully and securely in accordance with privacy laws. Please read the following carefully to understand our views and practices regarding your personal information and how we treat it. We may change this Privacy Notice from time to time, so please ensure that you check this page regularly.

1.1. Why do we need this policy?

This Policy outlines all processes and procedures which underpin Salford Community Leisure's commitment to upholding compliance with legislation as set out in section 1.3. of this Policy.

1.2. Who does this policy apply to?

This Policy applies to all Salford Community Staff, Volunteers, Customers and Visitors.

1.3. Relevant Legislation

The General Data Protection Regulations (GDPR) 2018 requires organisations to minimise the amount of personal information they ask for and it must relate to the original purpose it was asked for and not processed for any non-related issues unless you are informed or consent.

Personal information (sometimes referred to as personal data) is any information that enables Salford Community Leisure Ltd to identify a living individual from that information, either directly or indirectly. For example, basic details such as your:

- Name
- Address
- Telephone number
- Date of birth
- Visual images
- Information held about you in files
- Email address

Some information is classed as 'special category information' and needs more protection because it is more sensitive. It is often information that you would not want widely known and is very personal to you. This is likely to including anything that can reveal your:

- Sexuality or sexual health
- Religious or philosophical beliefs
- Ethnicity
- Physical or mental health
- Trade union membership
- Political opinion
- Genetic/biometric data
- Criminal history

2. Implementation

This Privacy Notice tells you what to expect when we, Salford Community Leisure Ltd, collect personal information. It applies to information we collect about you from:

- People who register for a membership or a service;
- People who fill out enquiry forms at events or within an SCLL venue
- People who contact us with a comment, enquiry or complaint
- People who are recorded on CCTV operated by us (including body worn cameras)
- Website usage
- Job applicants and our current and former employees.

2.1. How do SCL use personal data?

Salford Community Leisure Ltd is known as a Data Controller for any personal information which we have collected, for example, from online or paper correspondence or forms, by telephone, email or in person. This means that we collect the information and decide how it should be used.

We may on occasions collect information in relation to Salford City Council owned facilities or services, therefore, Salford City Council may in some cases be a joint Data Controller of this information. For details on how Salford City Council (SCC) use personal information, please click here: [Salford City Council Guidance Privacy Notes](#)

We use some personal information to provide and manage services effectively. We do not share personal information unless it is necessary, lawful and appropriate to

do. Where we can, we'll only collect and use personal information if we need it to deliver a service or meet a requirement.

We will always try and tell you how and why the information will be used. For some of our services, we need to collect personal information so that we can get in touch with you, or provide the service.

We may need to use personal information about you to:

- Provide services to you, such as access to sports facilities
- Promote the services we provide
- Carry out money transactions, including payments and refunds for services
- Check the quality of our services and to help with research and planning new services, such as by consulting, informing and gauging your opinion
- Train, support and manage our staff
- Help investigate any worries or complaints you have about our services
- Prevent crime and prosecute offenders, including via the use of CCTV and body worn cameras
- Ensure we meet our obligations in relation to diversity and equal opportunity

2.2. How do SCL collect personal data?

Generally, we collect and use personal information where:

- You have freely given it by completing an enquiry or comments form and consented to being contacted
- You have entered into a contract with us for the provision of services
- You, or your legal representative, have given us consent
- It is necessary for employment purposes
- You have made your information publicly available or you are in a public area for CCTV or body worn cameras
- It is necessary for archiving, research or statistical purposes
- It is necessary for legal cases
- It is required by law and/or
- It is necessary to protect someone in an emergency or to protect public health

Each individual service we provide will collect and use personal information in a particular way in order to provide and run that service.

Whilst Salford Community Leisure Limited is known as a Data Controller, there are occasions where SCLL has need to give access to a third party to perform part of our business. In these circumstances, the third party are known as a Data Processor.

2.3. Data Processors

SCLL use a number of third party organisations to assist us in managing our services. These organisations may have access to your personal data in the course of providing a service to us. An example of this is the computerised till and membership management systems. In these cases, SCLL will have a written agreement where SCLL set the limitations and purpose of what data can be processed and that no further or unauthorised processing is permitted. SCLL will seek assurances that all data processors are compliant with GDPR 2018.

Internally, SCLL has service level agreements with Salford City Council to provide services such as Financial Services, Human Resources, Payroll and IT network and support. In these cases, the service level agreement will cover the relevant aspects of GDPR 2018 and the restrictions on processing.

2.4. Automated Processing and Profiling

SCLL use management systems that automatically select members based on criteria such as your attendance to receive correspondence to allow us to gauge your satisfaction about your visit or to ensure you are getting the best out of your membership. It is used to improve the service we offer all our customers and to ensure they receive updates and promotions that best suit their usage and membership.

You have the right to object to such processing and this will be covered in the section on your rights.

2.5. How do SCL share personal data?

SCLL may share information with a number of external bodies but in most cases the information that is shared is not considered personal data. The form in which the information is shared will be statistical and anonymised. The list below is a broad summary of the types of organisations your personal information may be shared with:

2.5.1. Internally within Salford Community Leisure Ltd and/or Salford City Council.

In order to provide appropriate, timely and effective services, we may share basic information about you such as your name and address between services within Salford Community Leisure Ltd or Salford City Council. This is so that we can keep

information on you as up to date as possible and so we can improve our services to you. However, we ensure that staff within Salford Community Leisure Ltd, and within Salford City Council, can only access information they need to do their job.

SCLL operates services within premises owned by Salford City Council. As SCC is covered by Freedom of Information legislation, SCLL may be requested to provide SCC information to allow them to fulfil their legal duties in responding accurately.

Where SCLL operates services within a shared premise, with multiple services being delivered, such as Library services within a SCC Gateway facility, SCC employees may jointly deliver the service and may need access to the library management system and your personal data. In this case, SCC employees will be trained and will be acting as agents of SCLL.

SCLL may use CCTV within or around their facilities as a management tool to ensure service standards are being maintained. Some of the CCTV may be accessed remotely by managers. This is not meant to be used as a means of surveillance of employees and therefore managers should have a clear purpose for accessing the images. However, if whilst accessing footage, managers observe standards that fall below SCLL's expectations, SCLL has the right to use the footage in disciplinary investigations.

In the case of body worn cameras, employees will be trained in their use and will only record footage according to the purposes and scope laid out in SCLL's Data Protection Impact Assessment.

On occasions, different services within SCLL may want to inform you of services other than those you already receive. SCLL will be providing a preference service so that you can opt in to receiving information, updates and offers from all or just individual SCLL services.

2.5.2. Partner organisations under data sharing agreements or protocols.

a) Salford Community Leisure Ltd has data sharing agreements in place with local agencies and partner organisations, who we work with to provide certain services to you. Under a data sharing agreement, certain personal information is shared for a specific purpose. The agency or organisation receiving the information are obliged to only use that information to carry out that specific purpose to keep your data safe and secure. For example, personal data may be shared between Salford Community Leisure Ltd and Sport England, Big Lottery or other funding agencies in order to provide reports and outcomes on service delivery.

b) SCLL may share personal information with external agencies for the delivery of a particular service. An example would be a qualifications awarding body who would require personal information to enable them to process your award. In these circumstances the relationship is contractual and expected within the service delivery.

2.5.3. Third Parties

a) Sometimes the law requires that we have to pass on your personal data to a third party. For example, personal information may be provided to the courts, either because the court has ordered such information to be provided, or because Salford Community Leisure Ltd requires a court to do something (e.g. pursue an individual for settlement of a debt).

b) Even if not required to do so by law, we may also share your personal information when we feel there is good reason that doing so is more important than protecting your privacy. For all of these reasons, the risk must be serious before we can override your right to privacy. This does not happen often, but we may share your information:

- i) in order to find and stop crime and fraud
- ii) if there is a serious risk to the public, our staff or to other professionals
- iii) to protect a child or
- iv) to protect adults who are thought to be at risk, for example, if they are frail, confused or cannot understand what is happening to them

c) Information provided by you in response to our consultations, including personal information, may be disclosed in accordance with the Data Protection legislation

d) Please tell us if you want the information you provide to be treated as confidential. We cannot guarantee confidentiality, but we will take your views into account

e) We will not sell or give your personal information to a third party for marketing purposes unless we have asked your permission

2.6. Your Rights

You have the following rights with respect to your personal information:

2.6.1. You have the right to ask for access to the personal information we hold about you.

a) This is known as a 'subject access request'. You have the right to ask for all the information we have about you and the services you receive from us.

b) When we receive a request in writing, we must give you access to everything or specific information you have requested.

c) Further information about subject access rights, including how to contact us, can be found here: [Right of access | ICO](#)

2.6.2. You have the right to request that your personal information be given back to you or another service provider of your choice in a commonly used format.

a) This is known as 'data portability'. However, this only applies if we're using your personal information with consent (not if we're required to by law) and if decisions were made by a computer, not a human being. It is likely that data portability will not apply to most of the services that you receive from SCLL.

Further information can be found here: [Right to data portability | ICO](#)

2.6.3. You have the right to ask SCLL to stop using and/or delete your personal information.

a) This is commonly known as the 'right to be forgotten'. This includes withdrawing your consent to processing your personal data if your consent was relied upon. In some circumstances, you can ask for your personal information to be deleted, for example:

- i) Where your personal information is no longer needed for the reason why it was collected in the first place;
- ii) Where you have removed your consent for us to use your information
- iii) Where there is no other legal reason for the use of your information
- iv) Where deleting the information is a legal requirement

b) Please note that we can't delete your personal information where:

- i) Contractually we are permitted to keep it for the on-going delivery of a service (or beyond where there is legitimate interest)
- ii) We're required to have it by law
- iii) It is used for freedom of expression
- iv) It is in the interest of the wider public, for example, public health purposes
- v) It is for statistical purposes where it would make information unusable
- vi) It is necessary for legal claims
- vii) Where use of your personal information is not reliant on obtaining consent, for example, where your personal information is needed to comply with a legal obligation [Right to erasure | ICO](#)

2.6.4. You have the right to ask us to restrict what we use your personal information for, or to object to ways in which we process your personal information

- a) You have the right to ask us to stop using your personal information for any service. However, if this request is approved, this may cause delays or prevent us delivering that service to you.
- b) This request may be a temporary one (your right to restrict) or a more permanent one (your right to object). Where we process personal data for our legitimate interests, you have a right to object to that processing.
- c) When you ask for the use of your personal information to be limited, this means that it can't be used, other than:
 - i) To securely store the personal information itself;
 - ii) With your consent, to handle legal claims; or
 - iii) Where we are legally obliged to do so.
- d) Where possible, we'll seek to comply with your request, but we may need to hold or use your personal information because we are required to by law.
- e) Where we are able to limit the use of your personal information as requested, we will inform you of this.
- f) For further details on restricting the use of your personal data, please click here: [Right to restrict processing | ICO](#)
- g) For further details on objecting to how we process your personal data, please click here: [Right to object | ICO](#)

2.6.5. You have the right to change personal information that you think is wrong.

- a) You should let us know if you disagree with something written on your file.
- b) We may not always be able to change or remove that information, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.
- c) For further details, please click here: [Your right to get your data corrected | ICO](#)

2.6.6. You have the right to not be subject to automated decision making and profiling.

- a) Automated decision making is where decision are made about you by a computer, rather than a human. You have the right to ask to have any computer made decisions explained to you and details of how we may have 'risk profiled' you. You

have the right to question decisions made about you by a computer unless it's required for any contract you have entered into, required by law, or you have consented to it.

b) Profiling is where decisions are made about you based on certain things in your personal information, e.g. your attendance. If and when we use your personal information to profile you in order to deliver the most appropriate service to you, you will be informed at the outset in our membership terms and conditions.

c) We currently undertake automated decision making or profiling using your personal information to contact you for feedback following specific visits you have made to specific facilities or to ensure you are receiving the most from your membership. This profiling is based on your attendance rather than identifying personal data.

d) Profiling may take place to ensure you receive the most appropriate updates, promotions and information regarding your usage and membership. We will in all circumstances refer to your contact preferences where they have been given.

2.7. Can we use your information for any other purposes later on?

If we need to use your personal information for a different reason than we originally told you, or for an extra reason and we did not tell you about this in this privacy notice, we will provide you with a new notice. This will be given either at the time the information is collected, or before we begin to use information we already hold. This notice will explain the new or additional reason we need to use your personal information, and on what legal basis we can do so.

2.8. How long will your personal information be kept?

We will only hold your personal information for as long as necessary and in line with legal requirements or industry guidelines.

Due to the wide range of services delivered, the retention periods will differ according to the purpose and legislation/best practice within that area of the service.

The Active Lifestyles Team will be governed by the best practice in the health delivery services.

Financial information and contracts will be governed under financial industry and legislation guidance.

2.9. Where is your personal information kept and how is it protected?

The majority of personal information is stored on electronic systems or computer servers which are located in the UK.

However, there are some occasions where your information may leave the UK. For example, this may be because it needs to be transferred to another organisation which may use systems which store information outside of the UK (for example, over the internet such as cloud-based servers). When doing so, we will ensure that procedures and technologies are put in place to maintain the security of all personal data which is processed overseas.

We will take appropriate steps to make sure we hold records about you in a secure way, including:

- All employees who have access to your personal data or are associated with the handling of that data are obliged to respect the confidentiality of your personal data; and
- We will have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

2.10. Complaints or queries about personal data collection

SCLL aims to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you have any requests concerning your personal information or any queries with regard to our processing please e-mail the relevant service, found here: [Contact us - SCL](#).

If we are not able to provide you with a satisfactory answer at this stage, you have the right to complain to the Information Commissioner's Office. The contact details are:

0303 123 1113 (Local rate)

casework@ico.org.uk

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

2.11. Links to other websites

This privacy notice does not cover the links within this website linking to other websites. We encourage you to read the privacy statements on the other websites you visit. We also have no control over the nature, content and availability of websites linked from our websites. The inclusion of any links does not necessarily

mean that we endorse the views expressed within those websites and we accept no liability for any statements, information, products or services published or expressed on or accessible through any websites owned or operated by third parties.

3. Policy Review

This policy will be reviewed annually in line with the SCL Policy Review standards.