**Privacy Policy Draft 03.09.2021**

We are **Active Lancashire Limited**, a company registered in England and Wales (Company No. 06859894 with its office at **Office 3-4, Farington House, Lancashire Business Park, Leyland, Lancashire, PR26 6TW.** We are listed on the Information Commissioner’s register of data controllers under number: **ZA091993**.

### **What is the purpose of this policy?**

This Privacy Policy aims to give you information on how **Active Lancashire** collects and processes your personal information.

**Personal information** relates to information that can identify you or can be used to identify you. This includes things like:- *your email address, your name, your date of birth or your IP address*.

There is also **Sensitive Personal Information** that includes details of your physical or mental health, your ethnic origin or your religious beliefs for example.

Because we use, store and handled your personal information. the following laws apply to us:

*General Data Protection Regulation (EU) 2016/679*

*Data Protection Act 2018*

*Privacy and Electronic Communications (EC Directive) Regulations*

It is important that you read this policy, so that you are aware of how and why we are using such information.

Protecting your Information

We’ll always explain why we need personal information. We will only ask for what we need to for each project and we will always treat your information as confidential.

We securely store your personal information when using it, and we will dispose of it securely too. How we dispose of it will depend on what project you are enrolled on.

Sometimes, we use other organisations to help provide a service, and it’s necessary for your information to be used by them too. We have legal agreements in place with them which set out how we share and use this information.

We keep your personal information on secure software systems, databases, protected by passwords, firewalls and encryption.

**Work Place Health Champion /European Social Fund Project Information**

This section explains how **Active Lancashire** works with your data whilst you are with this project.

Data Processors

**Active Lancashire** are **Data Processors** for this project. This means that we will take your details and store them on a secure system and then forward that information on to the organisation that are the **Data Controllers** for the project, the **Department of Works and Pensions (DWP)** as part of **the European Social Fund (ESF)**

We work within strict data guidelines to make sure that whilst it is with us, your data will be secure, protected and processed in accordance with the law.

As **Data Processors**, we will hold your data as long as we need to and then will destroy it securely in keeping with the remit of the project.

Due to the nature of the project, the data is processed and kept in line with laws known as **General Data Protection Regulation (GDPR)** and **Data Protection Act 2018 (DPA)**

Data Sharing

Because this information is processed as a matter of Public Interest, there may be a need to share this data to keep you and others safe.

Where we can, we will try and tell you why we are sharing this data and who we are sharing this data with. Sometimes this may not be possible because it may put you in risk of harm.

The people we share data with includes**:-**

**DWP**- They are the data controller and we are required to share data to them

**Your GP**- If any health conditions or other significant information is required to be shared that may put you or others at the risk of harm.

**Active Lancashire Partners**- We may refer you to partners of this project, if this is required to help you achieve your Workplace Health Goals. A full list of partners is found below.

**Lancashire Colleges**- We may refer you to Lancashire College Partners so that they can enact the Basic Skills part of the project in the form of a Referral to Colleges providing these courses.

Active Lancashire Partners- Work Place Health Champion /European Social Fund Project Information

**Burnley Leisure**

**Blackburn with Darwen Borough Council**

**Blackpool Borough Council**

**Fylde Borough Council**

**Great Places Housing Group**

**Hyndburn Leisure**

**Lancashire Colleges C/O Preston’s College**

**Newground Housing**

**Pendle Leisure Limited**

**Ribble Valley Borough Council**

**Rossendale Leisure Trust Limited**

**South Ribble Borough Council**

**West Lancashire Borough Council**

**Wyre Council**

Data Controllers

The organisation that controls your data throughout this project are the **Department of Work and Pensions (DWP)** as **European Social Fund (ESF)** Representatives

This project is a matter of **Public Interest** and data processing” is *necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”*

Because of this, if you want to make a request to see the data that is held about you (make a Subject Access Request, called a SAR or DSAR) then you will need to contact the DWP at the following contact address.

**Right of Access Requests
Mail Handling Site A
Wolverhampton
WV98 2EF**

You can also do this online here

<https://secure.dwp.gov.uk/personal-information-request>

You can do this via email here

Freedom of Information Requests

Freedom-of-information-request@dwp.gov.uk

SAR/DSAR Requests

Rightofaccess.requests@dwp.gov.uk

You may find that because of the way the data is processed and the type of data held you will not be able to request that your data is erased (known as the ‘Right to be Forgotten’)

If you have any further questions about your data, please contact the DWP on the details listed above.

Data Concerns

If you are worried about how your details have been looked after or they have not been corrected when asked to do so, you can contact the Information Commissioners Office about your personal data concerns online at the following link: -

<https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

You can also contact them at

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

**Telephone: 0303 123 1113**

**Workplace Health Checks- Industrial Strategy Challenge Fund (ISCF) Projects**

This section explains how **Active Lancashire** works with your data whilst you are with this project.

Data Usage

**Active Lancashire** and the **University of Central Lancashire (UCLAN)** are Joint Data Controllers **of this project**. This means that both organisations have the responsibility to protect and make sure that the information we hold is secure, only what is necessary and shared, and destroyed in keeping with laws such as **General Data Protection Regulation (GDPR)** and **Data Protection Act 2018 (DPA).**

Data on this project is processed under two different parts of the GDPR.

**Article 6 (1) (f)** **Legitimate Interests**, meaning that we have a need to process your information to enable your participation in the project.

We also use **GDPR Article 9(2)(a) UK GDPR (explicit consent of the data subjects)** enabling us to process your personal data where consent to do so has been given.

Best-You Case Management System

We hold information relating to this project on Best-You, provided by ICE Creates Ltd. How they hold your data is found here: <http://info.best-you.org/privacy-policy/>

Data Sharing

Because this information is processed as a matter of legitimate interest, there may be a need to share this data to keep you and others safe.

Where we can, we will try and tell you why we are sharing this data and who we are sharing this data with. Sometimes this may not be possible because it may put you in risk of harm.

The people we share data with would includes: -

**Your GP**- If any health conditions or other significant information is required to be shared that may put you or others at the risk of harm.

**Active Lancashire Partners**- We may refer you to partners of this project, if this is required to help you achieve your project goals. A full list of partners is found on the opposite page.

**Lancashire Mind**- We may make a referral to Lancashire Mind if there is need to do so from the information that you give within the sessions. We will only pass on enough information so that we can make an adequate referral to them.

**UCLAN Social Impact Evaluation Plan**- Though based at UCLAN, these are independent researchers tasked with providing research surrounding the project. Where you have consented for them to contact you, we will provide only enough information that they require in order to fulfil their project obligations.

Active Lancashire Partners Workplace Health Checks- Industrial Strategy Challenge Fund (ISCF) Projects

**Blackburn with Darwen Borough Council**

**Blackpool Borough Council**

**Burnley Leisure**

**Fylde Coast YMCA**

**Hyndburn Leisure**

**Lancashire Mind**

**Lancaster City Council**

**Pendle Leisure Limited**

**Ribble Valley Borough Council**

**Rossendale Leisure Trust Limited**

**South Ribble Borough Council**

**UCLAN Social Impact Evaluation Plan**

**University of Central Lancashire**

**Ukactive**

**West Lancashire Borough Council**

Requesting/Deleting Your Information

**Active Lancashire** remain the lead organisation for processing your data throughout this project.

Because of this, if you want to make a request to see the data that is held about you (make a **Subject Access Request**, called a SAR or DSAR) then you will need to contact **Active Lancashire** at the following contact address.

**Information Governance, Active Lancashire
Office 3-4 Farrington House, Lancashire Business Park
Leyland, Lancashire
PR26 6TW**

You can also do this by email:-

informationgovernance@activelancashire.org.uk

For contact by post or email, we are bound to respond to you *within 30 days*, and will contact you further if there is a delay to make sure that you stay informed.

Deleting Your Information

If you wish to request the deletion of your data, known as the **Right to be Forgotten** or **Right to Erasure** under GDPR, please also contact the above address or contact us via email.

UCLAN Social Impact Evaluation Plan Data

Please contact WorkinLancs@uclan.ac.uk should you have any queries regarding the data held by the independent evaluation and research team.

Data Concerns

If you are worried about how your details have been looked after or they have not been corrected when asked to do so, you can contact the **Information Commissioners Office** about your personal data concerns online at the following link: -

<https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

You can also contact them at

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

**Telephone: 0303 123 1113**

### **Changes to this Privacy Policy**

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy policy, please contact businesshealthmatters@activelancashire.org.uk or call 01772 299830.