Privacy Policy – Our handling of personal information

Who are we?

South Lanarkshire Leisure and Culture Ltd (SLLC) is a company limited by guarantee. It was formed on the 1 October 2010 when much of South Lanarkshire Council’s (SLC) Cultural Services, Libraries and facilities were transferred to the Leisure Trust which had previously been formed in April 2002 to operate Sports and Recreation Services on behalf of the Council. The Outdoor Resource Base (ORB) was also transferred into the new company at the same time. Our main offices are a North Stand, Cadzow Avenue, Hamilton, ML3 OLX.

Why do we have a privacy policy?

We want users of our services to feel confident about the privacy and security of their personal information. We are aware that the proper handling of this information is vital.

We will take all reasonable steps to ensure that we comply with the requirements of the data protection laws, particularly in relation to the use of your personal information by us which is not compliant with data protection laws and/or the prevention of any unauthorised access to your personal information.

What is “personal information”?

When we talk about “personal information”, we are referring to any information that identifies someone as a living, private individual or could do so if combined with other information and is held electronically i.e. on a computer database or CCTV images.

What information do we hold about people?

In order to provide services, we have and use a large amount of personal data including sensitive personal data, about people. This information could be about current, past and prospective employees, suppliers, clients and service users/customers.

We may hold information such as someone’s name, address and date of birth, but we could have sensitive information such as information about his/her health, racial or ethnic origin, or any criminal offences that he/she may have committed. The type of information that we have will depend upon the reason why we need the information i.e. to provide a service to someone.
How do we get personal information?

In most cases, the information that we have will come from the person concerned, for instance when applying for a service from us. However, the information could come from the person’s legal representative, partner, relatives and other agencies in particular South Lanarkshire Council or NHS Lanarkshire.

How do we handle someone’s personal information?

We are registered under existing data protection laws. This means that we have notified the purpose(s) for collecting and holding this data to the Information Commissioner. We will not use someone’s personal information for any other purpose unless we get his/her consent or the law or a business need requires us to do so.

We will let person concerned know of any new uses of his/her information as soon as we can. However, there may be times when we will not let the person know i.e. if we are investigating him/her in relation to a criminal offence and to let him/her know would prejudice the investigation.

We know that if we do not comply with the data protection laws, including protecting the information, we will lose the trust and confidence of the public and our partners.

The data protection laws sets down rules that SLLC must follow when collecting and using personal information. These rules are called the Data Protection Principles.

To comply with these Principles, we must take steps to ensure that all personal information is:

- Lawfully, fairly and transparently held and used;
- held and used for specified purposes;
- adequate, relevant and limited to what is necessary for our purpose;
- accurate and up to date;
- not kept any longer than necessary;
- held and used in accordance with the data subject’s rights;
- kept secure;

What will we do with someone’s information?

We will only use personal information where we need to do so in connection with the provision, development and improvement of our services.

Who will we give someone’s personal information to?

We may share someone’s personal information with SLLC approved third parties for hosting data, and using personal data to improve and develop our services. Whilst these organisations will use/host personal data they will do so under the guidelines of the data protection laws and overall governance of SLLC. They will not pass this data onto any other bodies.

However, there may be times when we will share someone’s information without consent, for example, with the police, the Health Service or other agencies. We will only share your personal information in compliance with data protection laws.
What controls do we have in place?

We appreciate that we must have checks in place to make sure that we treat all personal information correctly.

We will apply this policy in all of our activities. SLLC as a whole has a responsibility for compliance with data protection laws. However, it places specific responsibilities on:

- the General Manager and the Senior Management Team, who will implement and enforce this policy across all SLLC services.
- the Company Secretary, who will provide guidance and assistance on ensuring security of personal information, such as how we store information, who should have access to information and how we transfer information to other bodies or agencies. In addition to this the Company Secretary will also provide guidance and advice on how to interpret data protection laws and check and review the effectiveness of this policy and our related procedures.
- Line managers, who will make sure that employees are aware of and comply with their responsibilities.
- Individual employees, who are to comply with their responsibilities.

Before we start to handle personal information for a new purpose or make changes to the existing way that we already handle information, we will carry out a privacy impact assessment (where necessary) at the earliest possible stage in the planning process.

We will try to ensure that any contractors, who are providing services on our behalf, treat any personal information in the same way that we do.

How do we ensure that what we do is still complaint with data protection laws?

SLLC is aware of its responsibilities in relation to holding and use of personal information all of the time it uses the personal information. Consequently, we will carry out regular reviews of the ways that we collect and use personal information to make sure that we are still complying with data protection laws. We will do this by carrying out a data protection compliance assessment on a regular basis determined by the sensitivity of personal information involved and if we make changes to the way we use personal information and a privacy impact assessment is not required.

How does someone find out what information we have about him/her?

A person can ask for a copy of the information that we have about him/her. This is called a “Subject Access Request”. Usually, we charge a fee of £10 for these requests. There are some circumstances where we do not charge this fee. We have explained on our website where we will not do so. If you want further details, please contact SLLC’s Company Secretary. His details are given later.

When making a request, the person concerned should try to be as specific as possible about the information he/she wants to see because this could speed up our reply. Where it is unclear as to the information wanted, we must ask for clarification as quickly as possible.

We have guidance about how to make a request. People can get it.

- By mail to Paul Barton, Company Secretary, South Lanarkshire Leisure and Culture First Floor, North Stand, Cadzow Avenue, Hamilton, ML3 0LX
  Tel: 01698 476153
- By email using paul.barton@southlanarkshireleisure.co.uk
What can someone do if the information that we have on him/her is wrong or he/she thinks that we have mishandled his/her information?

Under existing data protection laws, the person concerned has the right to get some personal information corrected or stop us using the information if it is incorrect or misleading. If you wish to exercise this right you should contact the Company Secretary whose contact details are as noted previously.

What if data protection laws change?

SLLC are aware that the laws on data protection will change on the 25th May 2018 and we are working towards complying with those changes. As and when necessary we will update the policy in accordance with the new laws.

We will publish any new or amended policy on our website.

More Information

You can get details of our notification to the Information Commissioner and information on the data protection laws published by the Information Commissioner at www.ico.gov.uk.