



# PRIVACY POLICY

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Privacy Policy Last reviewed: 10.7.20; Next review: 10.7.21

## Introduction

Inclusive Skating is a registered charity, primarily supporting those with additional needs, their families and/or carers. Inclusive Skating maintains a database of registered individuals and indicated they would like to receive newsletters, other publications and information about relevant events. This database is maintained on the Inclusive Skating Sport 80 platform. Inclusive Skating also processes information in respect of its branches, employer responsibilities for any members of staff, coaches or volunteers. Inclusive Skating does not use automated decision-making, including profiling.

Inclusive Skating and our branches comply with GDPR and the Data Protection Act 2018, and do not share data with third parties except where required by law. We do not transfer data outside of the EU. Rigorous procedures have been established to reduce the risk of compromise and ensure data is processed lawfully. Any suspected data breaches will be reported to the Information Governance Lead who will assess impact and consider further action in accordance with statutory guidance issued by the Information Commissioners Office. Throughout this Notice, unless otherwise defined, 'Inclusive Skating', 'we' and 'our' should be understood as referring to and representing Inclusive Skating.

## Data Collection and Processing

Key Roles: Data Controller or Data Processor?

- Inclusive Skating is Data Controller for Inclusive Skating data processing

How do we collect information?

We collect personal information from you when you make an online, written or telephone enquiry, attend an event, register with us, make a donation, volunteer or otherwise provide us with personal information. This information is stored on the Sport 80 platform. The data subject can access the Sport 80 platform and their registration at all times.

### Why do we process data?

Across the charity and service, we aim to provide service users with the highest quality information and support services. To do this we need to keep records about service users, the support we have provided or plan to provide to them. We know that our service users, trustees, staff and volunteers value their privacy and the security of personal information held about them and this Notice outlines our commitment and sets out how we use and protect any information that service users, staff and volunteers give to Inclusive Skating.

### Your rights as a 'data subject'

The 'data subject' will have access to certain rights which could include:

- ✓Right to be Informed
- ✓Right of Access
- ✓Right to Rectification
- ✓Right of Erasure
- ✓Right to Restrict Processing
- ✓Right to Data Portability
- ✓Right to Object
- ✓Rights related to Automated Decision Making and Profiling.

We will ensure that the rights of our service users, staff, trustees and volunteers are complied with in accordance with guidance provided by the Information Commissioners Office under GDPR.

### What Information is recorded/processed?

#### •Inclusive Skating Service Users:

- ✓Name, address, contact numbers, email address, IP address, date of birth, contact preferences and information requirements, gender, names of family members, ethnic status,
- ✓Benefits, education, health and social care information where provided
- ✓Disability and Medical information which may include symptoms/treatments where given

#### • Staff, Trustees and Volunteers

✓Name, address, contact numbers, email address, disability information (to meet access/adjustment requirements), IP address, names of family members (i.e. emergency contact information), DBS information

✓Staff and volunteers Only: Contact information as above plus qualifications, employment history, bank details, pension details, tax details, pay, sick leave, ethnicity

#### Legal basis for data processing

Legitimate Interest is the primary legal basis on which Inclusive Skating process personal data. We have undertaken an assessment of our data processes to ensure that our Legitimate Interest is necessary and proportionate and is the least intrusive basis for processing our service users' data:

- The storing and processing of data is necessary to enable the effective provision of our services
- The data we process, as part of our day to day operations, has minimal impact on the service user's privacy
- The principle beneficiaries of the data we process on this basis are service users We will only use individuals' data in ways they would reasonably expect, unless we have a very good reason not to, such as an overriding duty to ensure a person's safety.

In circumstances where Legitimate Interest is not the most proportionate basis to process data we will seek the consent of the person concerned. Personal data will be processed by employees, contracted staff and volunteers in accordance with this Privacy Notice.

#### Special Category Data

Inclusive Skating collect and record limited Special Category Data of its employees including health, ethnicity and disability information. The legal basis for processing this information is Article 9(2)(b); 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law...'

Inclusive Skating may collect and record service user ethnicity data for service user monitoring purposes. The legal basis for processing this information is Article

9 (2)(h); ‘processing is necessary for the purposes of ... ..the management of health or social care systems and services.’

Inclusive Skating collects and records service users’ benefits, health, education and social care needs as provided by service users in the provision of support and advocacy services. The legal basis for processing this information is Article 9 (2)(h); ‘processing is necessary for the provision of health or social care...’

Sharing information We will not sell, distribute or lease any personal information to third parties unless we have permission or are required by law to do so. The information held about you will only be shared where the following statements apply:

- You ask us to do so;
- We ask and you give us specific permission;
- We are required by law;
- We are permitted by law, for example where public interest overrides the need to keep the information confidential.

#### Third Party Processor Contracts

Inclusive Skating may from time to time engage the services of third party processors, i.e. for information technology support and security services or secure data/IT equipment destruction services. As Data Controller, we retain responsibility for this aspect of data processing and will always ensure that robust contracts and security processes and procedures are in place and that the third party complies with the requirements of the GDPR. Currently Inclusive skating has a third party contract with Sport 80 for the management of the event and registration platform.

#### Consent.

Consent will be used by Inclusive Skating in respect of consent to receive general information including newsletters, activities and events information, research information and fundraising and will be reviewed regularly. Any consent request will be unambiguous and involve a clear affirmative action (an opt-in) with the option to opt in (or out) of and the option to choose a preferred method of communication. Any personal data obtained through consent will be retained securely, will be used solely by Inclusive Skating and will not be passed to third

parties except where required by law. Where consent is the legal basis for processing, 'data subjects' retain the right to withdraw consent at any time.

#### Data retention periods

Data retention periods are reflective of the purposes of processing and will be reviewed subject to need and any changes in legislation.

#### Access to personal information

Inclusive Skating tries to be as open as it can be in terms of giving people access to their personal information. You can find out if we hold any personal information by making a 'subject access request' or by going to your portal on the Sport 80 platform. You can amend or modify the information on the Sport 80 platform at any time.

If we do hold information about you we will:

- ✓ Give you a description of it
- ✓ Tell you why we are holding it
- ✓ Tell you who it could be disclosed to
- ✓ Give you a copy of the information in an intelligible form

To make a request for any personal information we may hold, e-mail us at the address at the bottom of this Privacy Notice. If you believe that any information we are holding about you is incorrect or incomplete, you should contact us as soon as possible so that we may correct any information found to be incorrect.

#### How Inclusive Skating services use your information?

Inclusive Skating is working in the sport and care system to improve care for our community. Whenever you use a service, important information about you is collected in a record for that service. Collecting this information helps to ensure you get the best possible care and service.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new activities
- preventing illness and diseases
- monitoring safety

- planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better services for you, your family and future generations. Confidential information about your health and care is only used like this where allowed by law. Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential information isn't needed. You have a choice about whether you want your confidential information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential information will still be used to support your individual care. To find out more or to register your choice to opt out, please e-mail us.

On this web page where and when relevant you will:

- Find additional information about our Privacy Policy and additional GDPR notices
  - Find examples of when confidential information is used for individual care and examples of when it is used for purposes beyond individual care
  - Find out more about the benefits of sharing data
  - Understand more about who uses the data
  - Find out how your data is protected
  - Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can change your mind about your choice at any time.

Organisations have until 2020 to put systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential information they use or share for purposes beyond your individual care.

Inclusive Skating does not use or share confidential patient information for purposes beyond individual care or services. Inclusive Skating is currently compliant with the national data opt-out policy.

Inclusive Skating Website

Information submitted and statistics from Inclusive Skating service usage will be used to enable us to provide, manage and improve the Inclusive Skating services and to email customers occasionally about any Inclusive Skating resources and activities we think may be of interest. Inclusive Skating tracks usage of our websites through the use of cookies.

#### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. We take your privacy very seriously and comply with the UK and EU law on handling cookies and provide (you) the user with means to remove such cookies or prevent your computer from accepting them in the future.

#### Blocking and removing cookies

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer.

Below are instructions on removing cookies for all major web and mobile browsers so that you can find out about how to manage your cookies.

•Internet Explorer <http://support.microsoft.com/kb/196955>•Firefox

<http://support.mozilla.org/en-US/kb/Cookies>•Google Chrome

<http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

•Opera <http://www.opera.com/browser/tutorials/security/privacy/>

•Safari <http://docs.info.apple.com/article.html?artnum=32467>

•Safari iOS <http://support.apple.com/kb/HT1677>

•Android <http://support.google.com/mobile/bin/answer.py?hl=en&answer=169022>

- Blackberry Turn off cookies in the browser
- Windows

Phone Changing privacy and other browser settings

#### Data protection and confidentiality

Some services on the Inclusive Skating website may require us to collect personal information from you. To comply with the General Data Protection Regulations, we have a duty to tell you how we store the information we collect and how it is used. Any information you do submit will be stored securely and will never be passed on or sold to any third party.

#### Conditions of use

Use of this website constitutes agreement with the following terms and conditions. While Inclusive Skating takes every care to ensure that the materials, information and data (together the 'Materials') provided on this site (the 'Website') are accurate and up-to-date, we must emphasise that the Materials are provided 'as is' and without warranty or guarantee of any kind, whether express, implied or statutory, or whether relating to title, the rights of third parties or otherwise. Inclusive Skating reserves the right, at its absolute discretion, to add, revise or remove any Materials without notice.

#### Disclaimer

Inclusive Skating uses reasonable care to ensure the content of this website is accurate and up to date. Inclusive Skating does not guarantee the comprehensiveness, accuracy, suitability, currency or adequacy of this information on the website and disclaims all liability arising from its use. Inclusive Skating shall not be liable for any losses as a result of reliance on information provided. The content of this web site may be changed at any time without notice. The Materials are designed for general information purposes only and Inclusive Skating assumes no responsibility for information contained in the Website and disclaims all liability in respect of such information. Those who choose to access the site (the "Users") shall assume all risks of use and shall indemnify and hold Inclusive Skating its trustees, officers, employees, and agents harmless from and against any and all damages, liabilities, losses, costs, and expenses, including reasonable attorney's fees, arising out of or related to use of information, services or products offered and/or presented on this Website. Inclusive Skating makes no warranty that the Materials are free of infection by computer viruses or other contamination,

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#### Links to other websites

Inclusive Skating is not responsible for any content of any other website accessible from the Website, nor does it endorse or in any respect warrant any third party products or services by virtue of any information, material or content referred to or included on, or linked from or to the Website. Inclusive Skating has no control over, the data protection or privacy policies of these sites and makes no representation that the information or opinions contained on these sites, or associated links to these sites, are accurate, reliable or complete. Visitors should consult the privacy policies of these other websites and enter these sites at their own risk.

#### Copyright Notice

All information and copyright incorporated within this website is the property of Inclusive Skating and any unauthorised reproduction is prohibited. Unauthorised use of Inclusive Skating trademarks, trade names and logos is prohibited.

#### Complaints or Queries

Inclusive Skating tries 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; if anyone wants to make a complaint about the way we have processed their personal information please see contact details below. We would also welcome any suggestions for improving our procedures. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of data collection and use of personal information. This policy is supplemented by the additional notices and materials on the website. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the e-mail address below.

## Changes to this Privacy Notice

We keep our Privacy Notice under regular review which means it may change from time to time in line with legislation or industry developments. We will not explicitly inform our service users of these changes. Instead, we recommend that you check this page occasionally for any Privacy Notice changes. This privacy notice was last updated on 10<sup>th</sup> July 2020.

## How to contact us:

The data protection officer at Inclusive Skating: [inclusiveskating.event@gmail.com](mailto:inclusiveskating.event@gmail.com)