LOCHALSH LEISURE CENTRE

DATA PROTECTION AND PRIVACY POLICY

Lochalsh and Skye Swimming Pool Association, trading as Lochalsh Leisure Centre

Address: Douglas Park, Main Street, Kyle IV40 8AB

Effective date: September 2026 | Review date: October 2027 | Responsible: Centre Manager

1. Our commitment to privacy

Lochalsh Leisure Centre is committed to protecting the personal information of members, customers, staff, volunteers and visitors. We use personal information only where necessary to provide services, manage our facilities, meet legal obligations and operate effectively. We aim to comply with UK GDPR, the Data Protection Act 2018 and other applicable data protection legislation.

2. Information we collect

Depending on the service, we may collect:

• Names, addresses, telephone numbers and email addresses
• dates of birth
• membership and booking records
• swimming lesson attendance and progress
• relevant health, disability and support information
• emergency contacts
• payment and transaction details
• enquiries and complaints
• photographs, video and CCTV where used
• and employment or volunteer records.

We collect only information reasonably necessary for the relevant purpose.

3. How we use information

We use information to manage memberships, bookings, payments, swimming lessons, classes and activities; support health, safety and safeguarding; communicate service changes; respond to enquiries; maintain accounts; manage staff and volunteers; comply with law; and send permitted service or marketing communications. We do not sell personal information.

4. Lawful bases

Depending on the activity, we rely on contract, legal obligation, legitimate interests, consent or vital interests. Legitimate interests include proportionate administration, customer service and facility security, subject to individuals' rights. Consent may be used for optional promotional photography or marketing. Vital interests may apply in a life-threatening emergency.

For special-category information such as health or disability details, we also identify an appropriate Article 9 UK GDPR condition and, where applicable, a Data Protection Act 2018 condition.

5. Children's information

We collect only information needed to provide children's activities safely. We obtain details from parents or guardians where appropriate, restrict access, protect medical and support information, and respect children's rights according to their age and understanding. We do not publish identifiable photographs of children without an appropriate lawful basis and permissions.

6. Medical and sensitive information

Relevant health and additional-support information is accessible only to authorised staff who need it for their duties. Where lawful and necessary, information may be disclosed to emergency services or medical professionals.

7. Sharing information

We may share necessary information with booking, payment and IT suppliers, professional advisers, auditors, insurers, emergency services, healthcare professionals, regulators and other organisations where lawful. Appropriate processor contracts and security safeguards will be used where required.

8. Security and breaches

We use reasonable access controls, password-protected systems, secure paper storage, confidentiality guidance and secure disposal. Suspected personal data breaches are assessed promptly and reported to the ICO and affected individuals where required by law.

9. Retention

We retain records only as long as necessary for their purposes, legal obligations, safeguarding and legitimate claims. Membership, finance, employment, accident and safeguarding records may have different periods. A retention schedule should specify these periods; records are securely destroyed when no longer required.

10. Photography and CCTV

Photographs and video are used only where lawful and appropriate. Where promotional use relies on consent, consent may be withdrawn without affecting earlier lawful use. If CCTV operates, appropriate notices, access restrictions and proportionate retention apply. CCTV is not used in changing rooms or toilets.

11. Marketing

Essential service communications may be sent about bookings, memberships and lessons. Electronic direct marketing is sent only where consent or another lawful permission under applicable marketing rules exists. Individuals can opt out at any time.

12. Your rights

Subject to legal conditions and exemptions, individuals may request access, rectification, erasure, restriction, portability and information about processing; object to processing; withdraw consent; and receive protections relating to automated decisions. Individuals may object at any time to direct marketing and may object to processing based on legitimate interests. Requests are normally answered within one calendar month.

13. International transfers

Where service providers process information outside the UK, appropriate lawful transfer arrangements and safeguards will be used. Further information is available on request.

14. Information from others

Information usually comes directly from individuals or parents and guardians. It may also come from schools, partners or emergency contacts where appropriate. Required privacy information will be provided.

15. Required information and automated decisions

Some information is needed to provide a service or comply with law; without it, the service may not be available. Other information is optional. The Centre does not use solely automated decision-making producing legal or similarly significant effects [confirm before publication].

16. Contact and complaints

Centre Manager, Lochalsh Leisure Centre, Douglas Park, Main Street, Kyle IV40 8AB.

Email: [insert email address] Telephone: [insert telephone number]

You may also complain to the Information Commissioner’s Office (ICO): www.ico.org.uk | 0303 123 1113.

17. Review and approval

This policy is reviewed at least annually and when relevant legislation or practices change. Material changes will be communicated where appropriate.

Approved by: [Manager / Board of Directors] Approval date: [insert date] Next review: October 2027