

Privacy Policy

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Contact Details:

- Email: Info.Information@sefton.gov.uk
- Sefton Council's Registration Number: Z6451588

Active Sefton

Customers associated with these services:

1. **Fitness Membership**
2. **Aquatics Memberships**
3. **Lake Memberships**
4. **Leisure centre activities**
5. **Be Active**

What Information We Collect, Use, and Why:

- **General Information:**
 - Names and contact details
 - Addresses
 - Date of birth
 - Purchase or account history
 - Payment details (including card or bank information for transfers and direct debits)
 - Health information (including dietary requirements, allergies, and health conditions)
 - Health and safety information
 - Account information
 - Website user information (including user journeys and cookie tracking)
- **Special Category Information:**
 - Racial or ethnic origin (it is voluntary to provide this information)
 - Health information
 - Disability
- **For Customer Accounts and Guarantees:**
 - Names and contact details
 - Addresses
 - Payment details (including card or bank information for transfers and direct debits)
 - Account information, including registration details
 - Information used for security purposes
 - Marketing preferences
- **For Service Updates or Marketing:**
 - Names and contact details
 - Addresses
 - Marketing preferences
 - Website and app user journey information

Why we collect and use this information:

- Collecting membership payments
- For managing and checking the quality of our services
- For personalising the service, we offer based upon your individual needs
- For ensuring the health and safety of our staff
- To help investigate any concerns or complaints you have about our services and for answering enquiries under access legislation
- In carrying out our regulatory activities, such as safeguarding, etc
- To improve the general experience of our customers and of visitors to our websites
- For managing any online transactions, you may elect to make and/or marketing choices or preferences you may have expressed.
- For research or statistical purposes

Children, Young people & Adult health and wellbeing programmes

Customers associated with these services

1. Exercise Referral
2. Weigh Forward
3. Active Ageing
4. Workforce
5. NHS Health Check Programme ([Please see specific Lawful Basis](#))
6. Move It
7. 1-2-1 Programme

What Information We Collect, Use, and Why:

- **Contact Information:**
 - Telephone number
 - Mobile telephone number
 - Email address
- **Personal Information:**
 - Name
 - Full Address including post code
 - Gender
 - Details of registered GP Practice
 - Details of medical history
 - Smoking status
 - Alcohol use
 - Lifestyle and physical activity information
- **Equality Monitoring and Special Category Data:**

- Employment
- Sexual Orientation
- Religion
- Gender at birth
- Disability
- **Results of NHS Health Check Testing:**
 - Height
 - Weight
 - Waist measurement
 - Blood pressure
 - Heart Rate
 - Cholesterol
 - QRisk Score (this is the risk rating of you having a cardiovascular event)

Why we collect and use this information:

The Council and The Living Well Sefton Community Service (which includes Sefton CVS, May Logan Centre, Brighter Living Partnership, Netherton Feelgood Factory) use your personal information in order to:

- Organise and deliver the NHS Health Check Programme
 - Assess health risks and provide individualised lifestyle and wellbeing support
 - To recommend and refer into partner Living Well Sefton lifestyle and wellbeing services (Sefton Council, Sefton CVS, May Logan Centre, Brighter Living Partnership, Netherton Feelgood Factory, Sefton Carer's Centre and Smokefree Sefton).
 - To recommend to other third-party lifestyle and wellbeing services
- The pseudonymised data is also used to derive statistics and intelligence for research and planning purposes, which include:
- Producing assessments of the health and care needs of the population
 - Identifying priorities for action
 - Informing decisions e.g. on the design of services
 - Assessing the performance of the NHS Health Checks Programme
 - Reporting summary statistics to Office of Health Improvement and Disparities (OHID)
- These statistics are presented in such a way that individuals cannot be identified from them and person identifiable details are removed as soon as possible in the process of intelligence.

The lawful bases on which we use this information:

- Article 6(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- Article 9 (2) (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where domestic law provides that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

You may withdraw your consent to the processing of your personal data at any time. If you wish to do this, please contact the relevant service via the methods below:

Active.lifestyles@sefton.gov.uk Or call us on: 0151 934 2352

Active.sports@sefton.gov.uk Or call us on: 0151 288 6286

Active.workforce@sefton.gov.uk or call us on: 0151 934 2079

The lawful bases specific for NHS Health Check:

- Article 6(1)(c) of the UK General Data Protection Regulation gives the Council a lawful basis for collecting and using personal data in order to comply with its legal obligations,
- Article 6(1)(e) of the UK General Data Protection Regulation gives the Council a lawful basis for collecting and using personal data where it is in the exercise of official authority vested in the Council, performance of the task carried out in the public interest or in the exercise of the controller's official authority.
- Article 9(2) (g) of the UK General Data Protection Regulation gives the Council a lawful basis for collecting and using 'special category' data where the processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.
- Article 9 (2) (i) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of domestic law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.

The NHS Health Check Programme is a legal responsibility of unitary or upper tier local authorities in England as per Local Authorities (Public Health Functions and Entry to Premises by Local Healthwatch Representatives) Regulations 2013. The data processed as part of the check is used to establish a QRisk score which predicts the probability of an individual developing cardio-vascular disease. With consent, this information is also used to refer to partner Living Well Sefton lifestyle and wellbeing services (Sefton Council, Sefton CVS, May Logan Centre, Brighter Living Partnership, Netherton Feelgood Factory and Smokefree Sefton) or to advise the individual of other services as appropriate.

- Section 149 of the Equalities Act 2010 imposes a number of duties on public authorities when exercising their functions. More information on these duties can be viewed at the following link:
<https://www.gov.uk/government/publications/public-sector-equality-duty>

Access to Personal Information:

You are entitled to request, from the Council, access to those Council records which hold personal information about you. This entitlement is provided for under Article 15 of the UK General Data Protection Regulation 'Right of access by the data subject'.

If we do hold information about you, we will:

- Provide the purposes of the processing
- The categories of personal data concerned
- Give you a description of it
- Tell you why we are holding it
- Tell you who it could be disclosed to
- Let you have a copy of the information in an intelligible form

In certain circumstances, you also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Right to data portability in certain circumstances
- The right to lodge a complaint with the supervisory authority (the Information Commissioner's Office)

If you wish to make a request for any of the above, please email Ino.Information@sefton.gov.uk

Where We Get Personal Information From:

- Directly from you
- Health care providers
- Schools, colleges, universities or other education organizations
- Councils and other public sector organizations

How Long We Keep Information:

We retain your personal information for a period of **five (5) years**. This duration is necessary to meet our obligations related to:

- **Accounting and financial record-keeping**
- **Legal and regulatory compliance**
- **Internal reporting and auditing**

If your account becomes inactive and none of the above purposes apply, we will retain your data for a reduced period of **two (2) years**.

In **exceptional circumstances**, we may need to retain your information for longer than the standard retention periods. If this applies to you, we will notify you directly. Examples of such circumstances include, but are not limited to:

- Being **banned from our facilities or services**
- Involvement in **ongoing investigations or legal proceedings**
- Situations requiring **compliance with specific regulatory or safeguarding requirements**

Relating to NHS Health Checks

We hold your information for a period of 10 years from the date of your latest appointment in order to:

- ensure client eligibility for an NHS Health Check
- prevent duplicate records being created
- monitor and review the NHS Health Check programme

Data access is limited to key staff who are regularly trained to understand their duty towards protecting data and good information governance procedures.

Confidential public health data will only be shared with other areas of Sefton Council, Sefton CVS, May Logan Centre, Brighter Living Partnership, Netherton Feelgood Factory, Sefton Carer's Centre, Smokefree Sefton, Sefton GP Practices and Public Health England with the permission of the Caldicott Guardian, once the necessary legal basis has been established and data protection safeguards have been verified, so that the data is managed and used under the same restrictions. Anyone who received information from the controller is also under a legal duty to keep it confidential.

We are committed to handling your data responsibly and transparently. If you have any questions about our data retention practices, please contact us.

Who We Share Information With:

Sefton Council, along with all other Public Sector agencies, are committed to providing joined-up, cost-effective services to all our customers. To do this it is sometimes necessary to share your information with other departments, agencies or external service providers. This will only be done where the law permits and will be done in compliance with the law and in accordance with guidance provided by the Information Commissioner's Office.

Others We Share Personal Information With:

- Health care providers
- Sefton Council
- Sefton CVS
- May Logan Centre
- Brighter Living Partnership
- Netherton Feelgood Factory
- Sefton Carer's Centre
- Smokefree Sefton
- Sefton GP Practices
- Public Health England
- Office for Health Improvement and Disparities (anonymized aggregate information)

Requesting Access to Your Personal Data:

Under data protection legislation, you have the right to request access to information that we hold. To make a request for your personal information contact:

- Data Protection Officer at: info.information@sefton.gov.uk

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Right to data portability in certain circumstances
- The right to lodge a complaint with the supervisory authority (the Information Commissioner's Office)

Further Information:

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For more details, contact our the respective team as follows:

Active.lifestyles@sefton.gov.uk Or call us on: 0151 934 2352

Active.sports@sefton.gov.uk Or call us on: 0151 288 6286

Active.workforce@sefton.gov.uk or call us on: 0151 934 2079