DATA PROTECTION POLICY

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1. Introduction

Purpose of this Policy

The purpose of this policy is to:

- Ensure compliance with data protection legislation and regulatory requirements
- Protect the rights and privacy of individuals whose information we process
- Establish clear responsibilities for handling personal data
- Promote a culture of good information governance and accountability
- Reduce the risk of data breaches, unauthorised access, loss or misuse of information
- Support the safe and effective delivery of Living Better's services and activities

It should be read alongside the Privacy Notice (for those who access our projects, programmes and services) and the Employee Privacy Notice (for employees, volunteers and trustees of Living Better) where detailed information for individuals is contained.

Scope

This policy applies to all employees, volunteers, trustees, self-employed contractors, instructors, consultants and any other individuals who process personal data on behalf of Living Better. It applies to all personal information, regardless of the format in which it is held, and covers the collection, use, sharing, retention, storage or disposal of personal information relating to service users, participants, employees, volunteers, trustees, donors, partners, suppliers and other individuals with whom we interact. It covers information processed directly by Living Better and information processed on our behalf by third-party organisations or contractors acting under appropriate contractual arrangements. This policy applies whether office-based or working remotely.

2. Our Commitment to Data Protection

Living Sport Cambridgeshire and Peterborough Sports Partnership Limited (trading as **Living Better**) is the data controller for the personal information we hold about you. This means we decide how and why your personal data is processed.

We collect and use personal information to administer and deliver physical activity, sport, health and wellbeing programmes, manage relationships with participants and stakeholders, meet legal and regulatory obligations, safeguard individuals where appropriate, and operate effectively as an organisation.

Living Better is committed to complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant information governance requirements. This policy outlines the principles we follow when processing personal data, the responsibilities of those working on behalf of Living Better, and the measures we take to protect personal information throughout its lifecycle.

We aren't required to appoint a Data Protection Officer (DPO) under the UK GDPR but have decided to do so as best practice. We support our DPO to undertake the role to the same standards.

Data protection principles

We are committed to respecting the rights and freedoms of individuals, ensuring personal data is:

- Collected and used lawfully, fairly and transparently
- Purpose-driven and specific
- Relevant, adequate and limited to what is necessary
- Accurate and up-to-date, and checked and updated regularly
- Stored and processed securely
- Kept only as long as necessary

Living Better will also demonstrate accountability for compliance with data protection legislation through appropriate policies, procedures, training, governance arrangements and records.

3. Roles and Responsibilities

Data Protection Officer (DPO) oversees data protection practices including providing advice and guidance, coordinating individual rights requests and breach management, monitoring compliance and reports concerns. Supports GDPR paperwork completion including Data Protection Impact Assessments (DPIAs), Legitimate Interest Assessments (LIAs) and data processing and data sharing agreements.

Leadership Team supports implementation of this policy and embeds data protection within organisational decision-making, escalating significant risks and incidents where appropriate to the DPO.

Everyone at, and working as a partner with, Living Better must handle data safely and securely and follow this policy and relevant procedures. They will complete required training and will report incidents, concerns and rights requests promptly.

Board of Trustees ensures legal compliance and has overall responsibility for governance and oversight, receiving appropriate assurance about compliance and significant risks from the Chief Operating Officer (COO).

IT provider ensures security hardware and software is up to date and training is provided.

Responsibility	**Lead member of staff**
Data Protection Lead	DPO
Executive sponsor	COO
Legal compliance	The Board
Cover for DPO (if required)	COO

Final decision on reporting a breach to the ICO	DPO
Owner of relationship with IT Provider	COO
Approving DPIAs, LIAs, data sharing agreements and data processing agreements	DPO
Maintaining records	DPO
Training including recognition of a Subject Access Request	DPO
Safeguarding concerns	Designated Safeguarding Lead (DSL) and Senior Safeguarding Lead

4. Personal Data We Process and its Collection and Use

Living Better processes personal data relating to people who participate in or support our work. This may include participants and service users, children and young people, parents and carers, employees, volunteers, trustees, self-employed instructors, job applicants, donors, partners, suppliers and professional contacts.

Depending on the relationship and activity, personal data may include contact details, participation records, communications, financial information, employment or volunteering information, monitoring and evaluation data, photographs and recordings, marketing preferences and technical information relating to the use of our website and systems.

Where necessary and lawful, we may also process special category data, such as health, disability or accessibility information, and criminal offence data where there is a clear lawful basis and organisational need to do so.

We will only collect and use information that is relevant, adequate and necessary for specified purposes such as providing and improving the services we offer and in projects we deliver. **Full details of the information we collect, the purposes for which we use it, and the lawful bases we rely on are set out in our Privacy Notices.**

5. Lawful Basis for Processing

Lawful bases and relevant conditions are recorded in Living Better's Record of Processing Activities (ROPA), Privacy Notices and, where appropriate, assessments such as LIAs and DPIAs.

In summary:

Living Better will identify and document an appropriate lawful basis under **Article 6 of the UK GDPR** before processing personal data. Depending on the purpose, this may include consent, performance of a contract, compliance with a legal obligation, protection of vital interests, performance of a task in the public interest or exercise of official authority, or legitimate interests.

Where special category data is processed, Living Better will also identify an applicable condition under **Article 9 of the UK GDPR** and, where required, a condition under the Data Protection Act 2018. Where criminal offence data is processed, an appropriate basis and legal condition will also be identified.

Where **consent (Article 6(1)(a))** is relied on (for example for marketing or use of photographs), this can be withdrawn at any time by contacting us using the details in Section 15. Where **legitimate interest (Article 6(1)(f))** is relied on, this will be supported by a legitimate interest assessment.

6. Data Security and Access Controls

Living Better uses appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. For example, personal data is never shared without an identified lawful basis, proper authorisation and an approved secure method (including not via email unless password protected and that password shared via a different platform or method); and appropriate safeguards are in place if any software or platforms we use store data outside of the UK (see section 7) with new platforms approved by the DPO and COO.

Security measures will be proportionate to the nature, sensitivity and volume of the information, the risks to individuals, the systems used and the circumstances of the processing.

Everyone handling personal data on behalf of Living Better (in the office, in transit or from any other place of work including at home) must follow relevant security, confidentiality, records management and acceptable-use requirements. This includes role-based access controls, encryption and 2FA/MFA where appropriate, staff training, incident reporting and confidentiality requirements in our contracts with external providers. Electronic data is stored on encrypted software, and hard copies are stored in secure storage.

Individuals must not access, use, disclose or retain personal data for personal reasons or for any purpose that has not been authorised by Living Better.

7. Sharing Personal Data

Living Better will only share personal data where there is a clear, lawful and necessary reason to do so. Before information is routinely shared, Living Better will identify the purpose, lawful basis, respective responsibilities, information required, security arrangements and retention requirements.

Appropriate contracts or data sharing arrangements will be put in place where required. Living Better has a **Data Sharing Agreement** template it uses for this purpose.

Organisations processing personal data on Living Better's behalf must provide appropriate assurances and comply with their contractual and legal obligations. Living

Better has a **Data Processing Agreement** template it uses for this purpose; or some software providers, for example, have a public processing agreement that is used.

Some of the software and platforms we use may store or process data outside the UK. Where this happens, we ensure appropriate safeguards are in place, such as the UK's adequacy regulations, the International Data Transfer Agreement, or the UK Addendum to the EU Standard Contractual Clauses, so that your information continues to receive an appropriate level of protection.

Personal data may be disclosed without an individual's consent where the law permits or requires this, including where necessary to address a safeguarding concern, protect vital interests, prevent or detect crime, respond to a legal requirement or establish, exercise or defend legal claims.

Safeguarding

Living Better recognises that appropriate information sharing can be necessary to protect children, young people and adults at risk. Data protection law does not prevent proportionate information sharing where there is a lawful and necessary safeguarding reason.

Safeguarding information will only be shared with those who need it for an appropriate purpose. Living Better will consider the safety of the individual, the lawful basis for sharing, the minimum information required, the recipient, the urgency of the situation and whether it is appropriate to inform the individual.

Decisions to share or withhold safeguarding information will be documented and escalated to the designated safeguarding lead or data protection officer where advice is required.

8. Data Protection by Design and Accountability

Living Better will consider data protection at the earliest stage of designing, commissioning or changing a project, programme, service, process, system, form or supplier arrangement. Where applicable, privacy information will be provided in an age-appropriate format for children and vulnerable people.

Privacy risks will be identified, assessed and managed through proportionate measures, before processing begins. Living Better will maintain appropriate records to demonstrate compliance, including Records of Processing Activities (ROPA), Data Flow Maps, Data Protection Impact Assessments (DPIAs), Legitimate Interest Assessments (LIAs), contractual documentation and relevant decision records.

9. Individual Rights and Subject Access Requests (SARs)

Under UK GDPR, you have the right to **be informed** on how we collect and use your personal data as well as the right to:

- **Access**: request a copy of the personal data we hold about you through a SAR. These requests can be written or verbal and must go to our Data Protection

Officer (either directly or via any member of the organisation who will forward immediately to the DPO) using the contact details in section 15 and we will respond within the statutory one-month period.

- **Rectification**: ask us to correct inaccurate or incomplete data.
- **Erasure**: ask us to delete your data in certain circumstances.
- **Restriction**: ask us to limit how we use your data in certain circumstances.
- **Object**: object to our use of your data where we rely on legitimate interests, or to certain automated decision-making.
- **Data Portability**: request the transfer of your personal data to another organisation, where technically feasible.
- **Withdraw consent**: withdraw your consent at any time where we rely on consent as our lawful basis.

These rights are not absolute and may be subject to certain exemptions or limitations. To exercise any of these rights, please contact us using the details in Section 15. We will respond within one month, though this may be extended by a further two months for complex requests.

10. Data Retention and Disposal

Living Better will not retain personal data for longer than is necessary for the purpose for which it was collected or to meet applicable legal, contractual, safeguarding, insurance or regulatory requirements.

Retention periods are set out in the external and internal Privacy Notices. When information reaches the end of its retention period, it will be securely deleted, destroyed or anonymised unless there is a documented reason for retaining it for longer.

11. Personal Data Breaches

Living Better takes the security of your personal information seriously and has internally documented procedures in place to prevent, detect and respond to personal data breaches.

If a data breach is suspected (e.g. lost or corrupt data, unauthorised access or disclosure, accidental deletion or alteration), this must be reported immediately through Living Better's DPO. A breach must not be concealed, and its notification must not be delayed. The severity of the breach will determine whether it needs to be escalated to the Executive Team or trustees.

If a breach occurs that is likely to result in a risk to your rights and freedoms, we will take appropriate action to contain the breach and, where required by law, the DPO will notify the Information Commissioner's Office (ICO) within 72 hours and any affected individuals where the risk is likely to be high will be notified without undue delay.

Living Better record all breaches (whether they meet the ICO reporting threshold or not) on an internal GDPR reporting log to provide evidence of action taken, outcomes and learnings.

12. Training, Monitoring and Compliance

To maintain a strong culture of data protection and information governance throughout the organisation, we will ensure that employees, volunteers, trustees, self-employed instructors and others who process personal data on our behalf receive appropriate data protection and information security training relevant to their role and responsibilities. Data protection requirements are incorporated into the Living Better induction process and supported through ongoing training, guidance and awareness activities.

To ensure compliance with this policy and applicable data protection legislation, Living Better will monitor the effectiveness of its data protection arrangements through proportionate reviews, checks and assurance activities. This may include reviewing data protection documentation, retention practices, individual rights requests, personal data breaches, contracts, access controls, training completion and other compliance activities.

Identified risks, weaknesses, incidents and opportunities for improvement will be recorded on the internal GDPR recording log and addressed appropriately. Significant risks, repeated non-compliance or serious incidents will be escalated to the Exec team and the Board of Trustees as necessary and may result in action under the relevant employment, volunteering, contractual or governance arrangements.

13. Related Documents

This policy is supported by Living Better's related policies, notices, schedules, procedures, templates and guidance, including, where applicable:

Externally accessible:

- External-facing Privacy Notice including retention schedule
- Safeguarding policies

Internally accessible:

- Employee Privacy Notice including retention schedule
- Business Continuity Plan including personal data breach and SAR procedure
- Standard Operating Procedures (SOP) for Data Flow Map, DPIA and LIA
- SOP for Data Sharing Agreement, Data Processing Agreement and SLA
- Register of Processing Activities (ROPA)
- IT Use Policy and AI Policy
- Trusted provider checklist and its SOP

14. Complaints

How to raise a complaint

If you have concerns about how your information is handled, please contact Living Better in the first instance using the details in section 15. We will acknowledge receipt of your complaint within 30 days of receiving it. Without undue delay, we will take appropriate steps to respond to your complaint, including making appropriate enquiries, and keep you informed of progress and the outcome.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at https://ico.org.uk/make-a-complaint/ or by calling 0303 123 1113.

15. Contact Details

Data Protection Officer (DPO)

- Living Better Suite 3, James Hall, Parsons Green, St Ives, Cambridgeshire, PE27 4AA
- Telephone: 01487 841559
- Email of DPO: data@living-better.org.uk

DOCUMENT CONTROL

Next review date: October 2027

Triggers for an earlier review: new data protection laws, organisational and technological changes.

Version	Date	Author/Owner	Description of Change	Reviewed By	Approved By	Approval Date
3.0	September 2026	DPO – Roz Fitches	Updated	Giles Wright	Executive Team and Audit & Assurance Committee	October 2026