



The Be Well Partnership

Data Collection and Handling Policy

The Be Well Partnership and the organisations which form it (WellFit Health and Wellbeing CIC, Eat Well Glossop CIC, Glossop Community Allotment CIC and Football for Development CIC) (the '*Partnership*') is committed to processing data in accordance with its responsibilities under the GDPR.

Collection of Data

Data is collected from our customers via our Registration Forms. New customers are asked to complete this form at their first session.

We collect only enough personal data to ensure we can contact our customers for issues relating to the session they attend or any of our other sessions, dependent on which consent questions they have agreed to.

The Registration Form is given to the Admin team at the office who enter the data from the forms into an Excel Spreadsheet database.

The paper copy of the form is then filed and stored in the office where it can be accessed only by the two office-based Directors or by a member of staff with explicit permission.

The electronic version of the database is stored on one Director's laptop, which is protected by Norton Security and password protected.

Uses of Data

The data collected, per the attached Be Well Partnership Registration Form, is basic contact details – Name, Email/Telephone/Address - plus data required for monitoring purposes which are Postcode, Year of birth and Gender.

The contact details will be retained by the session leader, as well as the office, so that the session leader can let the customers know if a session is being changed in any way or if the session leader is concerned about the lack of attendance by a customer.

Consents

Customers have the option of ticking one of three consent levels relating to their own session, other sessions we offer and feedback. They are also advised that the level of their consents can be altered at any time by contacting us.

Other

We advise via the Registration Form that the Privacy policy is available upon request.

We also advise that photographs are taken at our sessions and may be used in promotional materials.

We also advise that sessions are undertaken at the customer's own risk and that the session leader should be advised of any relevant health issues and they should consult their GP if they are unsure as to whether they should attend.



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Health

Any health issues shared by the customer with the session leader will not be recorded on the company database, either paper or electronic, but will be noted only by the session leader.

Database maintenance

In May 2018 as part of the new GDPR process, the data records were 'cleansed'.

All customers who had not attended a session since 31/12/2017 had their electronic data anonymised. Only their postcode/date of birth/gender and activity attended were retained for monitoring purposes.

For these pre-2018 customers, the paper data form was destroyed by shredding.

All customers attending at May 2018 were asked to complete the new version of the Registration Form. Anyone on the 2018 database not completing a new Registration Form by the 1st August 2018 will be removed from the paper records and their data anonymised as detailed above in the electronic database.

The databases, both paper and electronic, will be cleansed in this manner every 12 months with anyone not attending for a period of 6 months or more being removed or anonymised.

Data processed on behalf of other agencies:

1. Transpeak Walks

Once the attendee name and telephone number and relevant health issues (if any) are transferred from the request form to the walk registers, the electronic request form will be deleted.

The attendee will be emailed to confirm their booking on the walk and subsequently only to advise of any changes to the walk details as instructed by the Walk Leader to the admin team.

Once the walk registers have been emailed to the Walk Leaders they will be kept in their electronic version for a maximum of three months then deleted.

2. Walking for Health

When walker registration forms and registers are received from Walk Leaders the information from the forms will be uploaded to the Walking for Health database and both registers and new walker registration forms shredded.

The data will not be stored on our own system.

Reports will be run periodically for High Peak Borough Council but these will contain anonymised information.

Review

The effectiveness of this policy and associated arrangements will be reviewed periodically under the direct supervision of the Board of Directors of WellFit Health & Wellbeing CIC.

This policy was drafted and approved by the WellFit Health & Wellbeing board on 24th March 2020.