

Privacy Policy

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1. Purpose

The purpose of this policy is to clearly outline how YMCA North Tyneside (The Organisation) collects, uses, retains, and discloses personal data. This document ensures compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It provides transparency regarding data processing activities, lawful bases for processing, and the rights of individuals.

2. Scope

This policy applies to all personal data processed by YMCA North Tyneside. This includes data relating to members, supporters, donors, service users, employees, and volunteers. It covers all data held in physical files and computer systems.

3. Definitions

- **The Organisation:** YMCA North Tyneside (The Data Controller).
- **Personal Data:** Any information about a living individual who can be identified from that data (e.g., name, email, CCTV image).
- **Special Category Data:** Sensitive data revealing racial or ethnic origin, political opinions, religious beliefs, trade union membership, health data, and sexual orientation.
- **Processing:** Any operation performed on personal data, such as collection, recording, storage, use, or erasure.

4. Roles and Responsibilities

- **The Board of Trustees:** Ultimately responsible for ensuring the charity meets its legal obligations.
- **Data Protection Lead:** The Data Protection Lead (Lynsey Crossman) is responsible for overseeing compliance with this policy, handling Subject Access Requests (SARs), and addressing data protection queries.
- **Staff and Volunteers:** Responsible for ensuring data is handled securely and in accordance with this policy.

5. Main Body of Policy

5.1 Data Protection Principles

YMCA North Tyneside complies with its obligations under the UK GDPR. The Organisation achieves this by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; and by protecting personal data from loss, misuse, unauthorised access, and disclosure.

5.2 Types of Data Held

The Organisation collects data necessary to pursue its charitable objectives, run events, maintain memberships, and manage staff and services. Data collected may include, but is not limited to:

- **Personal details:** Name, job title, date of birth.
- **Contact information:** Email address, telephone numbers, postal address.
- **Demographic information:** Postcode, age, gender.
- **Financial data:** Gift Aid declarations, bank details (for payments/donations).
- **Operational data:** Records of attendance (gym/youth club), housing resident records, and nursery records.
- **Safeguarding data:** Information required to protect children and vulnerable adults.
- **Security data:** CCTV footage and images captured for the prevention of crime and safety of premises.
- **Special Category Data:** Health data (for gym/nursery), race/religion (for equality monitoring), and criminal conviction data (where required for safeguarding/DBS).

5.3 Lawful Basis for Processing

The Organisation only processes data if a legal basis exists. YMCA North Tyneside relies on the following bases:

- **Legitimate Interest:** To administer membership records, manage volunteers, fundraise, and promote the interests of the charity.
- **Consent:** Where the individual has given clear consent (e.g., for marketing emails or newsletters).
- **Contract:** To fulfil a service requested by the individual (e.g., gym membership, nursery place, housing agreement).
- **Legal Obligation:** Where the Organisation is required by law to process data (e.g., Gift Aid records for HMRC, Health & Safety accident logs).

- **Vital Interests:** To protect a person's life (e.g., disclosing medical data to paramedics in an emergency).

5.4 Sharing Personal Data

Data will not be shared outside of YMCA North Tyneside, except:

- Where required by law (e.g., Police, HMRC, Safeguarding Boards).
- With trusted third parties acting as data processors (e.g., mailing companies, IT support, payroll providers). The Organisation ensures these third parties have strict data protection agreements in place.

We generally store your personal data within the UK or the European Economic Area (EEA). However, we use third-party service providers (such as cloud storage, email providers, or newsletter services) that may store or process data outside of these areas.

Where we transfer your data to a country outside the UK/EEA, we ensure it is protected to the same standard as if it were in the UK by relying on one of the following safeguards:

- **Adequacy Decisions:** We transfer data to countries that the UK Government has legally declared to have a robust level of data protection (e.g., the EU, Canada, Japan).
- **The UK-US Data Bridge:** For transfers to the USA, we rely on the UK Extension to the EU-US Data Privacy Framework, provided the recipient organisation is certified under this scheme (e.g., Google, Microsoft, Mailchimp).
- **Standard Contractual Clauses (SCCs):** Where the above do not apply, we use specific contracts approved by the UK Information Commissioner's Office (ICO) that give personal data the same protection it has in the UK.

5.5 Security

The Organisation is committed to ensuring that information is secure. Suitable physical, electronic, and managerial procedures are in place to safeguard and secure the data processed. This includes encrypted databases, locked filing cabinets, and restricted access.

5.6 Retention Periods

The Organisation retains data only for as long as necessary. Below is a summary of the retention schedule:

Record Type	Retention Period
CCTV Footage	30 days (unless retained for evidence in an incident).
Members/Supporters Contact Details	24 months after last contact.
Gift Aid / Financial Records	6 years after the financial year to which they relate.
Accident Books	3 years from date of entry (or until age 21 for children).
Safeguarding Matters	Indefinitely (or 75 years) in line with safeguarding best practice.
DBS Checks	Record of check result (Ref No, Date, Outcome) retained for 50 years (Single Central Record). Physical certificates are NOT retained longer than 6 months.
Employee Records (General)	6 years after termination of employment.
Employee Records (Safeguarding)	Significant records related to safeguarding concerns or disciplinary are retained for 50+ years.

Housing Resident Records	6 years after leaving accommodation. 6 months for rejected applications.
Nursery Records	6 years after the child leaves the nursery (or until age 21 for safeguarding files).
Unsuccessful Job Applicants	6 months after notification of rejection.
Board Minutes	Indefinitely (Permanent Archive).

5.7 Individual Rights

Unless subject to an exemption under the UK GDPR, individuals possess the following rights:

- **Right of Access:** To request a copy of the personal data held (Subject Access Request).
- **Right to Rectification:** To request correction of inaccurate or out-of-date data.
- **Right to Erasure:** To request data is deleted where it is no longer necessary.
- **Right to Withdraw Consent:** To stop processing where consent was the only legal basis (e.g., marketing).
- **Right to Restriction:** To ask for a pause in processing if there is a dispute about accuracy.
- **Right to Object:** To object to processing based on "Legitimate Interests" or direct marketing.
- **Right to Portability:** To request data be transferred to another provider (where applicable).

6. Related Policies

- Safeguarding Policy
- CCTV Policy
- IT Security Policy

7. Relevant UK Legislation

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012 (Biometrics & CCTV)

8. Monitoring and Review

The organisation is dedicated to ensuring our policies and procedures remain relevant, compliant and effective.

This policy will be reviewed annually, or more often if significant changes in legislation, regulations, risks or operations occur or if monitoring reveals a need.

The Data Protection Lead will oversee this process, and any necessary updates will be clearly documented, communicated and promptly implemented.

9. Appendix

A. Contact Details

To exercise all relevant rights, queries, or complaints, please contact:

Data Protection Lead

Name: Lynsey Crossman

Email: dataprotection@ymcanorthtyneside.org

Address: YMCA North Tyneside, Church Way, North Shields, NE29 0AB

Information Commissioner's Office (ICO)

Telephone: 0303 123 1113

Website: www.ico.org.uk

Revisions

This section details all significant changes and updates made to this policy document.

Revision Number	Date of Revision	Description of Change
2	Feb 2026	Updated terminology (UK GDPR) and new formatting/template