

Privacy Policy (Public)

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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), the Data Protection Act 2018, and the Data (Use and Access) Act 2025. 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:

- **Recognised Legitimate Interests:** The organisation relies on statutory recognised legitimate interests under the Data (Use and Access) Act 2025 for processing necessary for safeguarding vulnerable individuals, preventing crime, and responding to emergencies (no balancing test required).
- **Standard Legitimate Interests:** To administer membership records, manage volunteers, fundraise, and promote the interests of the charity, subject to a standard balancing assessment.
- **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 is not 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.

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

Where the organisation transfers data to a country outside the UK/EEA, it applies the statutory data protection test to ensure the standard of protection in the receiving country is not materially lower than that provided under UK law. The organisation achieves this by relying on Adequacy Decisions, the UK-US Data Bridge, or approved Standard Contractual Clauses (SCCs).

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. Please see the [Retention Schedule](#) for all categories.

5.7 Individual Rights

Unless subject to an exemption under the UK GDPR or the Data (Use and Access) Act 2025, individuals possess the following rights:

- **Right of Access:** To request a copy of the personal data held (Subject Access Request). The organisation conducts a reasonable and proportionate search to fulfill this request and reserves the right to "stop the clock" on the statutory one-month response deadline if clarification is required from the requester.
- **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).
- **Right to Complain:** To submit a formal complaint regarding data handling directly to the organisation. The organisation formally acknowledges all data complaints within 30 days and provides a full response without undue delay, prior to any escalation to the ICO.

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
- Data (Use and Access) Act 2025
- 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

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