

CACT HEALTH PRIVACY NOTICE

Charlton Athletic Community Trust (CACT) processes personal data, including health information, to deliver safe, appropriate and effective health, wellbeing and physical activity programmes.

Why CACT Collects Health Data

Health information is special category data under UK data protection law and requires additional protection. CACT only collects the information needed to assess eligibility, deliver support, manage risk, meet safeguarding duties, monitor outcomes and comply with legal, regulatory, commissioning and funding requirements.

Legal Basis and Special Category Data

CACT processes health data in line with the UK GDPR, the Data Protection Act 2018 and relevant health and safeguarding requirements. Where special category data is used, CACT identifies an Article 6 lawful basis and an Article 9 condition and applies any required safeguards.

Where Health Information Comes From

Information may be collected directly from participants, parents or carers, referral partners, healthcare professionals, the NHS, local authorities, delivery partners or programme monitoring records.

How Health Information Is Used and Shared

CACT shares health-related information only where it is necessary, proportionate and lawful, including for service delivery, safeguarding, clinical or wellbeing support, referrals, reporting to commissioners or funders, or where required by law. CACT does not sell personal data.

How Health Data Is Protected

CACT protects health data through appropriate technical and organisational measures, including restricted access, secure systems, staff training, data sharing arrangements, retention controls and breach reporting procedures.

How Long Health Data Is Kept

Health data is kept only for as long as necessary in line with CACT's Data Retention Policy, programme requirements, safeguarding obligations and legal or regulatory duties. It is securely deleted or anonymised when no longer needed.

Data Retention for Health-Related Data

CACT applies the UK GDPR storage limitation principle to health-related data. Health information is kept only for as long as it is needed for the specific health, wellbeing, safeguarding, referral, monitoring, reporting or programme purpose for which it was collected.

Retention periods for health-related data are set out in CACT's Data Retention Policy and relevant retention schedule. These periods are based on the type of health data held, the programme or service involved, participant risk, safeguarding considerations, referral requirements, commissioner or funder requirements, and any legal or regulatory duties that apply.

CACT periodically reviews retained health-related data and securely deletes or anonymises it when it is no longer required. Health-related data will not be retained indefinitely or kept "just in case". Where health information is retained for evaluation, reporting or statistical purposes, CACT will use anonymised or aggregated data wherever possible.

Individual Rights

Individuals have rights under data protection law, including the right to access their information, request correction, request erasure in certain circumstances, restrict or object to processing, and withdraw consent where consent is relied upon.

11. Contact Details and Complaints

For questions about health data or to exercise data protection rights, contact CACT's Data Protection Officer at dataprotection@cact.org.uk. Individuals may also complain to the Information Commissioner's Office if they are unhappy with how their data has been handled.

Full Privacy Notice

This is a concise health privacy summary. Please refer to the full CACT Privacy Notice for full details about how CACT collects, uses, shares, stores and protects personal data.

The full CACT Privacy Notice provides further health-specific detail, including the categories of health data processed, the relevant Article 6 lawful bases, Article 9 special category conditions, any DPA 2018 Schedule 1 conditions, retention periods, data sharing arrangements, DPIA considerations, automated decision-making position, internal data protection complaints process and ICO escalation rights.



You are welcome to contact us if you have any questions about the collection and processing of your data

DataProtection@cact.org.uk