



Get Active

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Data Protection Policy- GDPR 2021

General Data Protection Regulation 2018 (GDPR) Policy

Introduction

At Get Active Sports we respect the privacy of the children attending our clubs and the privacy of their parents or carers, as well as the privacy of our staff. Our aim is to ensure that all those using and working at Get Active Sports can do so with confidence that their personal data is being kept secure. We are registered with the Information Commissioners Office (ICO) ZA359763.

Get Active Sports needs to gather and use certain information about individuals, this can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This also includes names, dates of birth for participants and school children along with medical details, this is essential to ensure safeguarding of the welfare of children in our care.

This policy outlines how the information is collated stored and handled to ensure that best practice is in place to protect sensitive data whilst complying with the new law and guidelines.

1. Why this policy exists

Our updated General Data Protection Regulation 2021 Policy ensures that Get Active Sports:

- Complies with the data protection law and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Our lead person for data protection is Ryan White. The lead person ensures that Get Active meets the requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.

2. Who this policy applies to?

- The head office of Get Active Sports
- All staff and volunteers of Get Active Sports
- All contractors, suppliers and others working on behalf of Get Active Sports

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulation 2021. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Photographs
- Medical information





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- DBS and personal information
- Any other data we may collect.

3. Confidentiality

Within Get Active Sports we respect confidentiality in the following ways:

- We will only ever share information with a parent about their own child.
- Information given by parents to Club staff about their child will not be passed on to third parties without permission unless there is a safeguarding issue (as covered in our Safeguarding Policy).
- Concerns or evidence relating to a child's safety, will be kept in a confidential file and will not be shared within the Club, except with the designated Child Protection Officer and the manager.
- Staff only discuss individual children for purposes of planning and group management.
- Staff are made aware of the importance of confidentiality during their induction process and through ongoing training and meetings.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- Students on work placements and volunteers are informed of our Data Protection policy and are required to respect it.
- All customers personal data is stored securely electronically on password protected computers and tablets. This information is processed by Coordinate Sports on our behalf (e.g., to take online bookings and ensure we have relevant information as outlined by Ofsted)

4. Information that we keep.

The items of personal data that we keep about individuals are documented on our personal data matrix. The personal data matrix is reviewed annually to ensure that any new data types are included.

Children and parents: We hold only the information necessary to provide a childcare service for each child. This includes child registration information, medical information, parent contact information, attendance records, incident and accident records and so forth. If you decide that your child will no longer attend our clubs or childcare, we retain only the data required by statutory legislation and industry best practice, and for the prescribed periods of time. Electronic data that is no longer required will be deleted upon your request that your child will no longer attend our clubs, paper records are disposed of securely or returned to parents.

Staff: We keep information about employees in order to meet HMRC requirements, and to comply with all other areas of employment legislation. We retain the information after a member of staff has left our employment for the recommended period, then it is deleted or destroyed as necessary.

5. Sharing information with third parties

We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (e.g., Police, HMRC, etc). If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.





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We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children in our care.

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the normal running of our business, for example in order to take online bookings, and to manage our payroll and accounts. Any such third parties comply with the strict data protection regulations of the GDPR. Below is a summary of these third parties and our relationship with them.

- Coordinate Sport to process data on our behalf (e.g., to take online bookings and ensure we have relevant information as outlined by Ofsted).
- Mail Chimp to send information and updates on clubs.
- Stripe to process payments for childcare and clubs.
- Paycoll to process our payroll for our staff. www.paycoll.co.uk
- Peach Technologies to back up our servers.

All organisations privacy statements are available online:

<https://coordinate.cloud/privacy-policy/>

<https://mailchimp.com/legal/privacy/>

<https://stripe.com/gb/privacy>

6. Responsibilities

Everyone who works for or with Get Active Sports has some responsibility for ensuring data is collected, stored and handled appropriately. All employees have received GDPR training and is part of our induction process.

Each staff member that handles personal data must ensure that it is handled and processed in line with this policy and General Data Protection Regulation 2021 principles.

Whilst all staff members have a care of duty to ensure data is kept secure, below is an overview of specific responsibility.

The Directors are ultimately responsible for ensuring that Get Active Sports meets its legal obligations.

The Data Protection Officer is responsible for:

- Keeping the directors updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- Arranging data protection training and advice for the people covered by this policy.
- Handling data protection questions from staff and anyone else covered by this policy.
- Dealing with requests from individuals to see the data Get Active Sports holds about them (also called 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.

Get Active Sports use Peach Technologies (an external company) to:





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- Ensure all systems, services and equipment used for storing data meet acceptable security standards.
- Perform regular checks and scans to ensure security hardware and software is functioning properly.
- Evaluate any third-party services the company is considering using to store or process data. For instance, cloud computing services.

The Directors are responsible for:

- Approving any data protection statements attached to communications such as emails and letters.
- Addressing any data protection queries from journalists or media outlets like newspapers.
- Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

The only people able to access data covered by this policy should be those who need it for their work.

Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.

Get Active Sports will provide training to all employees to help them understand their responsibilities when handling data.

Employees should keep all data secure, by taking sensible precautions and following the guidelines below.

In particular, strong passwords must be used, and they should never be shared. These will be monitored via a central point through Peach Technologies.

Personal data should not be disclosed to unauthorised people, either within the company or externally.

Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.

Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

Get Active Sports collects and uses personal data to process bookings, as a point of contact, safeguard children, parents and staff at our clubs and camps, inform of changes and activities.

7. General staff guidelines

Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Data Protection Officer. We do not disclose this data to any third parties unless outlined in section 5.





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When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but may also be printed, typically for registers.

- When not required, the paper or files are kept in a locked drawer or filing cabinet.
- Employees make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Registers and personal data printouts are shredded and disposed of securely when no longer required.
- Contacting a customer or using their data in any way other than for the agreed purposes in line with Get Active's registration process is not accepted.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data is protected by strong passwords that are changed regularly and never shared between employees.
- Data is only stored on password protected computers, and via our third-party processing organisations (Section 5) if shared electronically with the child's school it is password protected and stored in a secure place.
- Data is backed up frequently. Those backups are tested regularly, in line with Peach Technologies backup process.
- Data is never saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data are protected by approved security software and a firewall.

8. Data use and handling

When working with personal data, employees must ensure:

- The screens of their computers are always locked when left unattended.
- Personal data is not shared informally.
- Data must be encrypted before being transferred electronically. The DPO can explain how to send data to authorised external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data from Coordinate Sport.

The law requires Get Active Sports to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Get Active should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.





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- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Office staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the DPO's responsibility to ensure marketing databases are checked against our central database every 6 months

All our staff are DBS checked and undergo training to ensure suitable handling and usage of data is being upheld.

9. Subject access requests

- Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about themselves.
- Staff and volunteers can ask to see any information that we keep about them.
- We will make the requested information available as soon as practicable and will respond to the request within one month at the latest.
- If our information is found to be incorrect or out of date, we will update it promptly.
- If any individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

10. GDPR

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data. Our legal basis for processing the personal information relating to you and your child is under your consent and for legitimate interests to allow us to keep you informed and safeguard your child.

GDPR – How Get Active Sports use your personal data.

The company is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained within this document.

This notice applies to current and former employees, workers, and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.





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Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.





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- Copy of driving licence.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- CCTV footage (where applicable) and other information obtained through electronic means such as swipecard records.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies (where applicable) or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.





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How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

Situations in which we will use your personal information

We need all the categories of information as listed primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing company benefits (where applicable).
- Liaising with your pension provider.
- Administering the contract, we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.





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- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.





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How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. Where we need to carry out our legal obligations or exercise rights in connection with employment.
2. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations (where applicable).

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of





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the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

Data sharing

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and (where applicable) other entities within our group.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?





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We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In order to determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.





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- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [POSITION] in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. In order to withdraw your consent, please contact your Manager in writing (including the legal basis for your belief that your consent can be withdrawn). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.





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If you have any questions about this privacy notice, please contact your Manager.

This policy was adopted by: Get Active Sports	Date: 1 st May 2021
To be reviewed: 1 st May 2022	Authorised by: Ryan White

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2017): Safeguarding and Welfare Requirements: Informatio*

