

GDPR Policy (POLICY NO. COVSS/004/V1)

	NAME	ROLE	DATE
AUTHOR	Kyle Offer	Swim School Manager	01/04/2025
REVIEWERS	Sarah Ruckwood	Head of Operations	09/04/2025
AUTHORISER	Leigh Whitbread	Secretary - COCSC	15/04/2025
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This document supersedes any previous GDPR Policy and documents. It is always available electronically via request from the Swim School Manager or Head of Operations or on Teams. Any other electronic or paper versions of this document sourced from any other network drive, email or other sources should be checked against the current Teams version prior to use.

EXPECTED USERS	<p>This policy is applicable to all individuals employed by the swim school, regardless of their employment status or role. This is also applicable to all customers of the swim school. This includes, but is not limited to:</p> <ul style="list-style-type: none"> • Swim School customers • Full-time employees • Part-time employees • Self Employed teachers • Temporary or seasonal staff • Fixed-term contract employees • Apprentices and interns • Additionally, this policy extends to volunteers and any other individuals working under the direction of the Club, ensuring a comprehensive and uniform approach to discipline within our organisation. <p>It is crucial for all customers and members of our staff to be aware of and understand this the policy is designed to ensure fair treatment for all employees and customers by providing clear guidelines.</p>
DESCRIPTION	<p>This policy is established to ensure that all employees and customers of the swim school have a clear understanding of the GDPR processes and how we ensure all your information is kept safe.</p>
ACTION REQUIRED	<p>This Policy will be stored on Teams and shared with all concerned. It will be available on request for all to see and action to agree to abide by the policy. It will also be supplied to new starters beginning employment or any customers as part of their contract agreement.</p>



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1. Introduction

Coventry Swim School is a private company limited by guarantee without share capital, overseen by Swim England regulations. As a swim school, Coventry Swim School collects and stores personal data about its swimmers (children and adults), their parents/guardians (where appropriate), and staff (referred to as "members"). As such, Coventry Swim School is bound by the General Data Protection Regulation (GDPR), which came into effect in May 2018.

The Management Committee of Coventry Swim School is responsible for ensuring GDPR compliance and ensuring that staff and volunteers understand their obligations regarding personal data privacy. This includes preventing data breaches (i.e., unauthorized access to or loss of personal data) and ensuring that Coventry Swim School is able to respond to Subject Access Requests (SARs) within the required 30-day period.

2. Why Coventry Swim School Collects Personal Data

Coventry Swim School collects sensitive personal data about our members to:

- Ensure the safety and well-being of swimmers.
- Understand the interests and needs of swimmers.
- Enable Coventry Swim School to contact parents/guardians or next of kin in case of emergency.

3. How Coventry Swim School Uses Personal Data

Data collected by Coventry Swim School is used exclusively for swimming-related activities and is required for the following purposes:

- Managing Group Lists and Movement: To monitor swimmer progress and movement between different levels/groups.
- Monitoring Payments: To manage subscription collections and any other payments.
- Health and Safety: To provide instructors with necessary details about health, dietary needs, backgrounds, and interests of swimmers to tailor activities and ensure safety.
- Emergency Contact: To enable staff to contact parents/guardians or medical professionals in case of an emergency.
- Tracking Achievements: To document swimmers' progress and achievements.
- Compliance with Safety Procedures: To meet accident insurance requirements and safeguard procedures.
- Safeguarding: To perform DBS (Disclosure and Barring Service) checks for staff working with children.
- Gift Aid: To claim gift aid donations where applicable.



- Event Safety: To ensure safety during events, especially those managed by third parties.
- Photo Permissions: To collect parental or adult consent for the publication of photos.

4. Data Privacy Notices and Agreements

New members will be provided with a Data Privacy Notice and Agreement either electronically or in paper format, clearly outlining the data collected, how it is used, and how it will be stored and shared.

Existing members will receive updates on privacy notices and agreements as necessary.

5. Subject Access Requests (SAR)

Members have the right to:

- Request a copy of the data Coventry Swim School holds about them.
- Request that their data be corrected or deleted.
- To request data or exercise other rights under GDPR, members must submit a SAR to the Swim School Manager. A "reasonable fee" may be charged in accordance with the Coventry Swim School's SAR policy. Requests will be responded to within 30 days. In certain cases, information may be redacted to maintain confidentiality.

6. Data Breach Notification Procedures

A data breach is any incident where personal data is disclosed to unauthorised individuals, lost, or otherwise compromised. Examples include:

- Unauthorised access to data.
- Loss of devices (e.g., laptops, mobile phones) containing personal data.
- Misdirected emails or faxes.
- Security incidents such as hacking attempts.

In case of a suspected or actual data breach, staff should report it immediately to the Swim School Manager. If the breach meets the severity threshold, the Information Commissioner's Office (ICO) will be notified within 72 hours.

7. Responsibilities

Management Committee - The Management Committee is responsible for ensuring GDPR compliance by:

- Providing guidance on data collection, processing, storage, and retention.
- Overseeing policies and procedures related to SARs and data breach management.
- Ensuring that all staff and volunteers understand and follow GDPR guidelines.

Adult Members and Volunteers - Adult members and volunteers must:

- Collect, process, and store data only for the purposes of their role.



- Follow best practices for data security and privacy.
- Adhere to all Coventry Swim School policies and procedures to ensure compliance with GDPR and prevent data breaches.

8. Data Collection and Storage Procedures

Data Collection - Personal data may be collected via:

- Email/Phone: For initial queries such as joining details (name, date of birth, parent contact details, swimming history).
- Paper Forms: For sensitive data collection (health details, emergency contacts, etc.), which should be stored securely and shredded when no longer required.

Where possible, electronic data storage is preferred, but where paper forms are used, they must be securely stored and shredded when no longer needed.

9. Data Storage

Data should ideally be stored electronically on a secure system, protected by strong passwords and encrypted storage devices.

Paper forms, if used, should be stored in locked files with keys kept separately.

Sensitive data should only be retained as long as necessary and securely destroyed when no longer required.

10. Data Sharing and Use of Email

Personal data should be minimised in email communications. Avoid including sensitive data in the body of the email. Use BCC for mass emails.

Sensitive information should only be sent as password-protected attachments, and passwords should be shared securely by phone.

11. Social media and Sharing

Personal data should never be shared or stored on social media platforms or direct messaging apps.

Coventry Swim School social media accounts should only be used for non-sensitive updates and general communication.

Adult members must remind young swimmers not to share personal information or images of themselves or others on social media.



12. Data Retention

Data should be stored only as long as it is required for the specific purpose for which it was collected.

For young swimmers, personal data should be deleted as soon as possible after it is no longer needed, but no later than 3 months.

For adult members, regular data “cleansing” should be performed to remove unnecessary or outdated information.

13. Review and Updates

This policy is reviewed periodically by the Management Committee.

Any changes or updates will be communicated to all members.

CHANGE HISTORY

POLICY NUMBER	EFFECTIVE DATE	SIGNIFICANT CHANGES
Version Number unknown – as seen on old website Aug 2024	April 2025	Updated to new format – re wording on some areas