Paddles Swim School GDPR Policy

Paddles Swim School is committed to protecting the personal data and privacy of children, parents, carers, staff, and volunteers. We recognise our legal responsibilities under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

As a swim school working with **children and young persons with disabilities and additional needs**, we understand that much of the data we process is **sensitive personal data** and we take our responsibilities seriously.

This policy applies to:

- Children attending swimming lessons
- Parents and carers and PA's
- Staff, swim teachers, assistants, and volunteers
- Contractors and partner organisations

It covers all personal data held in paper, digital, verbal, or electronic form.

We process personal data in accordance with the UK GDPR principles. Personal data will be:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Kept only for as long as necessary
6. Processed securely to protect against unauthorised access, loss, or damage

We may collect and store the following information:

a) Children & Families

- Child's/young persons name, date of birth, and contact details
- Parent/carer contact information

- Medical information (including disabilities, additional needs, allergies, and health conditions)
- Emergency contact details
- Swimming ability and progress records
- Safeguarding or incident records (where required)

b) Staff & Volunteers

- Contact details
- DBS information
- Qualifications and training records
- Safeguarding and disciplinary records where applicable

We process **special category data** (such as disability and medical information) because it is:

- Necessary to ensure the **health, safety, and wellbeing** of the child and or young person
- Required to provide appropriate **reasonable adjustments**
- Collected with **explicit consent** from parents/carers, unless another lawful basis applies

We process personal data under the following lawful bases:

- **Consent** (e.g. medical and disability information)
- **Legal obligation** (e.g. safeguarding, health and safety, insurance, Swim England requirements and to manage any contracts or payments thereof)
- **Vital interests** (to protect life and safety)
- **Legitimate interests** (to manage lessons and ensure safe provision along with sending information on activities and events that have been arranged for the swim school)

We may need to contact you by email, post or SMS/WHATSAPP with information about our products and services we believe you may be interested in. We will only send marketing messages to you in accordance with the preferences you set. You can let us know at any time that you do not wish to receive marketing message by contacting us at info@

Consent can be withdrawn at any time, subject to legal or safeguarding requirements.

Collection

Personal data may be collected through:

- Registration and enrolment forms
- Medical and additional needs forms

- Emails, phone calls, and conversations
- Incident, accident, and safeguarding records

Secured

We ensure personal data is stored securely by:

- Using password-protected systems
- Restricting access to authorised staff only
- Storing paper records in locked cabinets
- Encrypting devices where possible
- Regularly reviewing data security practices

Sharing

We only share personal data when necessary and lawful, such as with:

- Emergency services
- Safeguarding authorities and police (e.g. Local Authority Designated Officer)
- Swim England (where required for safeguarding or compliance)
- Insurers or legal advisors
- The Government or our Regulators: where we are required to do so by law or to assist with their investigations or initiatives

We never sell personal data to third parties.

Storage

We keep personal data only for as long as necessary but no longer than 6 years after your involvement with Paddles Swim school ends:

- Children's or young persons records: retained in line with safeguarding and insurance requirements
- Accident and safeguarding records: retained in line with statutory guidance
- Staff records: retained in line with employment law

Data is securely destroyed when no longer required.

Access

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict or object to processing
- Data portability
- Lodge a complaint with the **Information Commissioner's Office (ICO)**

Requests should be made in writing and will be responded to within **one month by the paddles committee** .

Breach of Data

Any data breach (loss, theft, or unauthorised access) will be:

- Reported immediately to the Chairman and or Vice Chairman
- Investigated promptly
- Reported to the ICO within 72 hours where required
- Communicated to affected individuals where appropriate

Responsibilities of Staff

All staff and volunteers must:

- Follow this policy at all times
- Complete data protection and safeguarding training
- Maintain confidentiality
- Report any data protection concerns immediately

Responsibilities of Members

It is important to ensure that the personal information we hold about you is accurate and up to date, and you should let us know if anything changes, for example if you change your phone number or email address.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us. If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

Responsibility for data protection lies with:

The Chairman and Vice Chairman of Paddles Committee

For data protection queries, contact:
info@

More information about your legal rights can be found on the Information Commissioner's website at https://ico.org.uk/for-thepublic

Review

This policy will be:

- Reviewed annually
- Updated to reflect changes in legislation or guidance