



# GDPR & Data Protection Policy

For Multi-Sport Delivery in Primary Schools

Organisation Name: Love.Play.Active.

Policy Review Date: September 2025

Next Review Due: September 2026

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## 1. Policy Statement

Love.Play.Active. is committed to protecting the privacy and personal data of the children, families, schools, and staff we work with. We collect and process personal data lawfully, transparently, and securely in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

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## 2. Purpose of this Policy

This policy explains:

- What personal data we collect
  - Why and how we use it
- How we store and protect data
- What rights individuals have over their data
  - Our legal obligations under GDPR

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## 3. Scope

This policy applies to all Love.Play.Active. staff, coaches, and contractors who handle personal data during multi-sport delivery, including school-based and community sessions.

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## 4. Key Principles of Data Protection

We are committed to upholding the following principles:

1. **Lawfulness, fairness & transparency** – We process data lawfully and clearly explain how it is used.
2. **Purpose limitation** – We only collect data for specified and legitimate purposes.
3. **Data minimisation** – We only collect data that is adequate and relevant.
4. **Accuracy** – We keep personal data accurate and up to date.
5. **Storage limitation** – We do not keep data longer than necessary.
6. **Integrity & confidentiality** – We keep data secure and confidential.
7. **Accountability** – We take responsibility for how we use and protect personal data.

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## 5. What Data We Collect and Why

We collect the following types of data:

Data Type	Purpose	Lawful Basis
Child's name, class, age	Attendance, safeguarding, session delivery	Legitimate interest / Legal obligation
Medical or SEN needs	To adapt activities for safety and inclusion	Vital interests / Consent
Parent/Carer contact info	Emergencies, booking systems, consent	Consent / Contract
Staff/Coach details	Employment, training, DBS checks	Legal obligation / Contract
Session registers	Safeguarding, reporting, insurance	Legal obligation

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## 6. Lawful Bases for Processing

We only process personal data where there is a lawful basis under UK GDPR, including:

- **Consent** (e.g. media permissions)
- **Contractual necessity** (e.g. coach agreements)
- **Legal obligation** (e.g. safeguarding, DBS checks)
- **Vital interests** (e.g. in a medical emergency)
- **Legitimate interest** (e.g. improving service quality)

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## 7. Data Sharing

We will only share personal data when necessary and lawful, for example:

- With schools for safeguarding or session management
  - With emergency services in a medical emergency
- With IT service providers (e.g. online booking systems) under data processing agreements

We **do not** share personal data with third parties for marketing purposes.

## 8. Data Storage and Security

- All personal data is stored securely using password-protected systems or encrypted storage.
- Paper records (e.g. registers) are kept in locked files and destroyed after use.
  - Personal data is only accessed by authorised staff.
  - We conduct regular reviews of data retention and disposal.

## 9. Retention Periods

Data Type	Retention
Session registers	2 years
Accident/incident records	3 years (or longer for safeguarding)
Staff records	Up to 6 years after employment ends
Safeguarding records	Until the child is 25 years old (in line with guidance)

## 10. Individual Rights

All individuals have the right to:

- Be informed about how their data is used
  - Access their personal data
  - Request correction of inaccurate data
- Request deletion of their data (where lawful)
  - Object to or restrict processing
  - Data portability (in limited cases)
- Withdraw consent at any time (where applicable)

Requests can be made to our Data Protection Lead (see contact below). We aim to respond within 30 days.

## 11. Data Breach Procedure

In the event of a data breach:

- It will be reported immediately to the Data Protection Lead.
  - If there is a risk to individuals' rights and freedoms, the ICO (Information Commissioner's Office) will be notified within 72 hours.
    - Affected individuals will be informed where required.
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## 12. Staff Responsibilities

All staff and coaches must:

- Complete data protection training
  - Only access or share data when authorised and necessary
    - Report data breaches immediately
  - Follow secure data handling and storage procedures
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## 13. Policy Review and Monitoring

This policy is reviewed annually or following a major breach, complaint, or legal update. Compliance is monitored by the Data Protection Lead.

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## 14. Contact and Data Protection Lead

**Name:** Henry Broadhurst

**Role:** Director

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**Phone:** 07436633901

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## Further Information

- UK Information Commissioner's Office (ICO): [www.ico.org.uk](http://www.ico.org.uk)
  - Data Protection Act 2018