

GDPR Policy

Privacy Notice

The General Data Protection Regulation (GDPR, May 2018) is new EU Legislation that replaces the Data Protection Act. It is wide-reaching legislation that aims to keep data secure.

"The Swim Hub" takes your privacy seriously, in accordance with the General Data Protection Regulation,

"The Swim Hub" will ask you for personal data about you and your child/ren in order to deliver Swimming Lessons.

"The Swim Hub" must have a legal basis for collecting this data, and there are six lawful bases:

Consent: The individual has given clear consent for you to process their personal data for a specific purpose.

Contract: The processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

Legal Obligation: The processing is necessary for you to comply with the law (not contractual obligations).

Vital Interest: The processing is necessary to protect someone's life.

Public Task: The processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

Legitimate interests: The processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

"The Swim Hub" will be processing your data under the following bases: Consent, Contract, Legal Obligation, and Vital interest.

Where "The Swim hub" require consent, a way for you to positively make a decision about the information that you make available and how this is shared will be made available.

How "The Swim hub" uses your information

"Swim Hub" are the nominated Data Handler. "The Swim Hub" will collect information as part of a child's induction to Swimming Lessons. "The Swim Hub" will be asking for this data via our Registration form, and recording this information digitally onto Love Admin. (Love Admin is an online management system) "The Swim Hub" will ask for this information at regular intervals to ensure it is up to date. "The Swim Hub" will do this by asking you to complete and return a data form.

The information required will be:

- Child's name
- Child's Date of Birth
- Child's age
- Child's address
- Parents' names, addresses, contact numbers

- who has parental responsibility for the child
- Emergency contact names,
- Any allergies/medical history/requirements
- Whether the child has any special educational needs or disabilities

This data will be used to:

- Support your child's swimming development
- monitor and report on your child's progress
- share information about activities at "The Swim Hub"
- contact named people in an emergency
- share with other professionals in accordance with legislation
- ensure a contract of service is delivered and maintained

With your permission this data may be, when necessary shared with our local safeguarding children's board or Social Services Referral and Assessment team if there are any concerns about the safety of your child.

If you want to see a copy of the information held about you or your child then please contact us info@theswimhub.co.uk

Online Data Processing

Electronic Equipment : Computers, Laptop, and tablets are used for by "The Swim Hub" . Personal information however is not stored on any of these devices. All information is held on "Love Admin. Photographs taken for the use of swimming development or promotion of "The Swim Hub" are stored on the computer. All devices have Antivirus software, and folders and documents that relate to "The Swim Hub" are password protected

Love Admin Webpage

"The Swim Hub" store all information relating to existing students via Love Admin software. Love Admin stores the information on secure servers, and information cannot be accessed without a username and password.

Website

There will be no personal information on "The Swim Hub" website. All photographs will protect a child's identity.

Email

Should "The Swim Hub" need to email you. we will use my email provider Google. Your email address will not be stored on our contact list within the provider address book, but rather within Love Admin should we need to access it.

Text Messages & Whatsapp

"The Swim Hub" use EE as their mobile phone provider to send and receive messages to parents. "The Swim Hub" will keep a copy of your mobile phone number on Love Admin and will not store your mobile number on their mobile phones.

"The Swim Hub" will use whatsapp to communicate with you in the same way as sending text messages.

Paper Information Storage

There will be documentation that I will store that cannot be processed onto Love Admin. These documents will be stored in a secure folder.

Document Retention

"The Swim Hub" is required by law to keep some information about your child for a period of time after a child has left us. I will keep a record of this and dispose securely at the correct time.

When a child leaves, all documentation will be downloaded from the Love Admin site and printed off to be kept as required below:

Information relating to the Safeguarding and Welfare requirements including accident, injury and first aid records, medication records, attendance data, incident records, details about physical intervention required to keep a child safe etc is retained until the child is 21yrs 3mths as required by my insurance Company

Information relating to self-employed accounts is retained for 6 years as required by HMRC

Document Deletion

Files held in relation to children and their families on the computer are deleted when no longer required (as above). Files held in paper format, including photos are either handed to parents or shredded when no longer required.

Making a Complaint

A complaint can be made to "The Swim Hub" via email, or in writing.

Info@theswimhub.co.uk

ICO: If you are concerned that a data breach has been made, you can contact the Information Commissioner's Office - <https://ico.org.uk/for-organisations/report-a-breach/>

Changes to this Privacy Notice

This privacy notice is reviewed annually and updated as required

Data Protection Policy

In order to provide a quality service and comply with legislation, "The Swim Hub" will need to request information from parents about their child and family. Some of this will be personal data.

"The Swim Hub" takes families privacy seriously, and in accordance with the General Data Protection Regulation (GDPR), will process any personal data according to the seven principles below:

1. Must have a lawful reason for collecting personal data, and must do it in a fair and transparent way. Be clear about what data collected, and why.
2. Only use the data for the reason it is initially obtained. This means that "The Swim Hub" may not use a person's data to market a product or service to them that is unconnected to the reasons for which they shared the data with us in the first place.
3. "The Swim Hub" must not collect any more data than is necessary. Only data needed in order to do the job will be collected.

4. Ensure that the data is accurate, and ask parents to check annually and confirm that the data held is still accurate.
5. Must only keep the data for as long as is needed to complete the tasks it was collected for
6. Must protect the personal data. Ensure that *"The Swim Hub"* and anyone else charged with using the data, processes and stores it securely.
7. *"The Swim Hub"* will be accountable for the data. *"The Swim Hub"* will be able to show how compliance within the law.

Subject Access

Parents have the right to inspect records about their child at any time. Requests should be made in writing and will be processed in a reasonable time frame and without delay. Parents are asked to regularly check the data is correct and update it where necessary.

Storage

"The Swim Hub" is paperless in regards to general customer records. Only paper Accident and incident forms will be stored. These will be held in a locked cupboard for the required period time.

The majority of records relating to children and their families are kept on *"Love Admin"* a secure password protected online digital solution. Parents permission will be obtained, and will have their own username and password to access only the information specific to their child/children.

"The Swim Hub" will ensure to carry out due diligence to ensure *"Love Admin"* are compliant with GDPR.

Information Sharing

"The Swim Hub" will not share any information with anyone without parents consent, unless there is a child protection concern.

Record Keeping

"The Swim Hub" will keep all accident records for a period of 7 years.

"The Swim Hub" will notify Swim England of any accidents that may result in an insurance claim, eg an accident resulting in a doctor or hospital visit. Swim England will log and acknowledge receipt of the correspondence. The company providing public liability insurance for *"The Swim Hub"* will also be contacted so that a claim number can be allocated.

"The Swim Hub" will inform Health and Safety Executive of any significant injuries, accidents or deaths as soon as possible.

"The Swim Hub" will record all significant incidents, and will share these with parents so that together we can work to resolve any issues.

"The Swim Hub" will only share information if it is in a child's best interest to do so. For example in a medical emergency, medical information will be shared with a healthcare professional. If a teacher working on behalf of *"The Swim Hub"* is worried about a child's welfare, as there is a duty of care to follow the Local Safeguarding Children Board procedures and a referral will be made where appropriate. Where possible *"The Swim Hub"* will discuss concerns with you before making a referral.

Safe disposal of data

"The Swim Hub" is required by law to keep some data for a period of time after a child has stopped sessions. This information relates to attendance and accident records. *"The Swim Hub"* have a review plan in place that ensures any data is disposed of appropriately and securely.

Suspected Breach

If "The Swim Hub" suspect that data has been accessed unlawfully, relevant parties will be informed immediately and a report to the Information Commissioner's Office will be made within 72 hours. "The Swim Hub" will keep a record of any data breach.

Retention Policy

The General Data Protection Regulation is an EU Law from May 2018. It requires "The Swim Hub" to share information with you about data retention after your child has stopped Swimming with us.

The Data we retain about you and your child :

Financial data retained for HMRC purposes

Data about you and your child is stored online via admin platform "Love Admin" until your child stops lessons with us and then the documentation is printed off in paper format.

To comply with the Limitation Act 1980, Accident, injury and First Aid Records are kept using the legal basis of "legal obligation" and insurance requirements, until your child is 21 years and 3 months old.

Attached to Accident, Injury and first aid records, attendance registers are kept using the legal basis of "vital interests" to provide additional evidence of compliance with the EYFS.

Information kept in paper format will be shredded once its retention period has expired.

Data relating to the Learning and Development requirements of the EYFS

"The Swim Hub" use the legal basis of "legitimate interest" when taking photos and videos of your child. "The Swim Hub" believe it is reasonable to process this data in order to provide you with a good quality service.

"The Swim Hub" keeps the information relating to your child's progress online via "Love Admin"

Any photos or videos taken that relates to your child's swimming progress, will be shared with you. This information will be given to you again when your child leaves lessons with us, and in turn will be removed from our records.

Financial record Keeping

Documentation will be kept including your name and payment record for HMRC using the legal basis of "Legal Obligation". This information will be kept both online and in paper format. This information must be kept for 6 years as required to retain by HMRC, after which time they are deleted.

Personal Data

"The Swim Hub" will keep documentation for as long as legally required by the purpose for which it was collected. There is no absolute duty to encrypt data stored online but it will keep it as securely as possible during the retention period. (see Article 32 of GDPR for more information)

You have the right to ask for information held about you and your child to be withdrawn. This is called the "right to erasure" in GDPR. However, if the information is kept because it is legally required then exceptions to the "right to erasure" apply.