



# **Sports Active Coaching**

*Making kids Active in Sport*

## **PRIVACY NOTICE FOR PARENTS/ CARERS OF CHILDREN**

# Privacy Notice For Parents/Carers Of Children

Sports Active Coaching collects data and information about children taking part in our programmes so that we can run effectively as a company. This privacy notice explains how and why we collect data about parents / carers of children attending programmes by the company, what we do with it and what rights parents and children have.

The Data Protection Officer (“DPO”) for Sports Active Coaching is: **Heather Coates**

The term “parent” is widely defined in law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the child, with whom the child lives or whether the child has contact with that parent), and also includes non-parents who have parental responsibility for the child, or with whom the child lives.

It is therefore possible for a child to have several “parents” for the purposes of law. This privacy notice also covers other members of children’s families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

## Why Do We Collect And Use Parent / Carer Information?

We collect and use parent / carer information under the following lawful bases:

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- d. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about parents / carers is sensitive personal data, we will only process it where:

1. we have explicit consent;
2. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
3. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our Data Protection and Freedom of Information Policy for a definition of sensitive personal data.

We use the parent / carer data to support our functions of running programmes and the company, in particular:

1. to support child learning;
2. to monitor and report on child progress;
3. to provide appropriate pastoral care;
4. to assess the quality of our services;
5. to comply with the law regarding data sharing;
6. for the protection and welfare of children and others in the company, including our safeguarding / child protection obligations;
7. for the safe and orderly running of programmes for the company;
8. to promote the company;

9. to send you communications that may be of interest to you which may include information about company events or activities, news, campaigns, appeals, other fundraising activities, newsletters, FISA events;
10. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
11. in connection with any legal proceedings threatened or commenced against the company.

The categories of parent / carer information that we collect, hold and share include:

1. Personal information (such as name, address, telephone number and email address);
2. Information relating to your identity, marital status, employment status, religion, ethnicity, language, medical conditions, nationality, entitlement to certain benefits, information about court orders in place affecting parenting arrangements for children;

From time to time and in certain circumstances, we might also process personal data about parents / carers, some of which might be sensitive personal data, information about criminal proceedings / convictions or information about child protection / safeguarding.

This information is not routinely collected about parents / carers and is only likely to be processed by the company in specific circumstances relating to particular children, for example, if a child protection issue arises or if a parent / carer is involved in a criminal matter.

Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police.

Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about parents / carers before pupils join the school and update it during pupils' time on the roll as and when new information is acquired.

## **Collecting Parent / Carer Information**

Whilst the majority of information about parents / carers provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to ask your permission to use your information for marketing purposes or to request voluntary contributions. Parents / carers may withdraw consent given in these circumstances at any time.

In addition, the company also uses CCTV cameras around different programmes for security purposes and for the protection of staff and children. CCTV footage may be referred to during the course of disciplinary procedures (for staff or children) or to investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

# Storing Parent / Carer Data

A significant amount of personal data is stored electronically, for example, on our database. Some information may also be stored in hard copy format.

Data stored electronically may be saved on a cloud-based system which may be hosted in a different country.

Personal data may be transferred to other countries if, for example, we are arranging a trip to a different country. Appropriate steps will be taken to keep the data secure.

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, insurance or reporting requirements.

Details of retention periods for different aspects of your personal information are in-line with and in accordance with the Information and Records Management Society's toolkit.

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 a parent / carer of a child at the programme we will retain and securely destroy your personal information in accordance with our Data Retention Policy or applicable laws and regulations.

## Who Do We Share Parent / Carer Information With?

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The regulator Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- IT service providers

In the event that we share personal data about parents / carers with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

# Requesting Access To Your Personal Data

Under data protection legislation, parents / carers have the right to request access to information about you that we hold ("Subject Access Request").

To make a request for your personal data, please contact the DPO, Heather Coates using the contact details at the end of the notice.

The legal timescales for the company to respond to a Subject Access Request is one calendar month. As the company has limited staff resources outside of school term time, we encourage parents / carers to submit Subject Access Requests during term time and to avoid sending a request during periods when the schools are closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection and Freedom of Information Policy.

## 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 manifestly 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.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the our data protection responsibilities.

## 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. To withdraw your consent, please contact the DPO. 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.

# Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact

If you would like to discuss anything in this privacy notice, please contact:

Heather Coates (Data Protection Officer)  
Purley Youth Centre,  
906A Brighton Road,  
Purley,  
CR8 2LN.  
[dpo@sportsactivecoaching.co.uk](mailto:dpo@sportsactivecoaching.co.uk)

## 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.