

Data Protection Policy

GDPR compliance statement



Approved by:	Tom Humphreys		
Last Reviewed on:	24/7/2026		
Next Review Due:	24/7/2027		

Purpose

Primary Sports Giants is committed to protecting the privacy and personal information of all children, parents, carers, staff, volunteers, contractors and partner organisations.

We collect and process personal information to safely deliver our childcare, sports coaching, wraparound care, holiday camps, HAF programmes, PE provision and related services.

We recognise the importance of protecting personal information and are committed to complying with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and all other relevant legislation.

This policy explains how personal information is collected, processed, stored, shared and protected throughout the organisation.

Scope

This policy applies to all services delivered by Primary Sports Giants, including:

- Holiday Camps

- HAF Programmes
- After School Clubs
- Curriculum PE
- Sports Coaching
- School-Based Activities
- Educational Visits
- Residential and Overnight Camps
- Birthday Parties
- Staff Recruitment
- Volunteers
- Contractors
- Visitors
- Events

It applies to all personal information held electronically or in paper format.

Data Controller

Primary Sports Giants is the **Data Controller**.

Responsibility for data protection rests with:

Tom Humphreys

Director

Primary Sports Giants

Email: **info@primarysportsgiants.co.uk**

Telephone: **07795546455**

Our Commitment

Primary Sports Giants is committed to:

- Processing personal information lawfully, fairly and transparently.
- Collecting only information that is necessary.
- Keeping information accurate and up to date.
- Protecting information from unauthorised access.
- Storing information securely.
- Retaining information only for as long as necessary.
- Respecting the rights of individuals.

Information We Collect

We may collect personal information relating to:

Children

- Name
- Date of birth
- Gender (where provided)
- Home address
- School attended
- Year group
- Medical conditions
- Allergies
- Medication requirements
- SEND information
- Dietary requirements
- Emergency contacts
- Attendance records
- Behaviour records
- Accident reports
- Incident reports
- Safeguarding information
- Photographs and videos (with consent)

Parents and Carers

- Name
- Address
- Telephone numbers
- Email address
- Emergency contacts
- Collection permissions
- Relationship to the child
- Payment information
- Communication preferences

Staff and Volunteers

- Contact details
- Employment records

- Qualifications
- DBS information
- Training records
- Payroll information (where applicable)
- Attendance records
- Emergency contacts

Why We Process Information

We use personal information to:

- Deliver childcare and sports provision.
- Register children for activities.
- Keep children safe.
- Meet safeguarding responsibilities.
- Contact parents when necessary.
- Provide first aid and administer medication safely.
- Process bookings and payments.
- Monitor attendance.
- Meet legal obligations.
- Comply with Ofsted requirements.
- Deliver Local Authority funded programmes including HAF.
- Improve our services.
- Celebrate achievements where consent has been given.

Lawful Basis for Processing

Primary Sports Giants processes personal information under one or more of the following lawful bases:

Contract

To provide childcare, coaching and related services.

Legal Obligation

To comply with legislation including:

- Childcare Act 2006
- Health and Safety legislation
- Safeguarding legislation
- Ofsted requirements

- HMRC regulations

Legitimate Interests

To safely operate and improve our organisation.

Vital Interests

Where processing is necessary to protect someone's life or wellbeing.

Consent

Where consent is required, including:

- Photography
- Marketing communications
- Promotional materials

Consent can be withdrawn at any time.

Special Category Data

We may process special category data including:

- Medical information
- Disabilities
- SEND information
- Allergies
- Dietary requirements where medically required
- Safeguarding information

This information is only processed where necessary to protect children, comply with legal obligations or where appropriate consent has been obtained.

UK GDPR Principles

Primary Sports Giants follows the seven principles of UK GDPR:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation

- Integrity and confidentiality
- Accountability

Data Sharing

Personal information is only shared where necessary and lawful.

This may include:

- Schools
- Local Authorities
- HAF Programme Administrators
- Ofsted
- NHS Professionals
- Emergency Services
- Social Care
- Police
- Insurance Providers
- Legal Advisers
- Software providers who securely process information on our behalf

Primary Sports Giants will never sell personal information.

Third Party Systems

Primary Sports Giants uses secure third-party providers to help deliver its services, including:

- Google Workspace
- OnSide Live
- Secure payment providers
- Email services
- Online booking systems
- Cloud storage platforms

Where third parties process information on our behalf, appropriate contracts and data processing agreements are in place.

International Data Transfers

Some trusted service providers may process information outside the United Kingdom.

Where this occurs, Primary Sports Giants ensures that appropriate safeguards are in place in accordance with UK GDPR, including UK adequacy regulations or approved contractual clauses

Information Security

Primary Sports Giants protects personal information by:

- Password-protected devices.
- Multi-factor authentication where available.
- Encrypted cloud storage.
- Restricted user permissions.
- Secure filing systems.
- Locked storage for paper records.
- Secure destruction of confidential documents.
- Antivirus and malware protection.
- Regular software updates.
- Staff training on cyber security and data protection.

Access to personal information is restricted to authorised personnel only.

Staff Responsibilities

All staff, volunteers and contractors must:

- Complete GDPR and data protection training.
- Keep passwords secure.
- Never share login details.
- Lock devices when unattended.
- Use company-approved systems.
- Keep paperwork secure.
- Maintain confidentiality.
- Report any suspected data breach immediately.
- Follow all company data protection procedures.

Failure to comply may result in disciplinary action.

Confidentiality

All personal information must be treated as confidential.

Staff must:

- Discuss information only on a need-to-know basis.
- Never discuss children or families outside work.
- Never leave confidential paperwork unattended.
- Dispose of confidential waste securely.

Photographs and Videos

Primary Sports Giants may take photographs or videos during activities for:

- Parent communications
- Marketing
- Social media
- Website
- Promotional materials

Photographs will only be used where appropriate parental consent has been obtained.

Parents may withdraw consent at any time.

Children will never be identified by full name alongside photographs.

Further information can be found in the Photography Policy.

Individual Rights

Under UK GDPR individuals have the right to:

- Access their personal information.
- Correct inaccurate information.
- Request deletion where appropriate.
- Restrict processing.
- Object to processing.
- Request data portability.
- Withdraw consent.
- Complain to the Information Commissioner's Office (ICO).

Requests should be submitted to the Director.

Subject Access Requests

Individuals have the right to request a copy of their personal information.

Requests should:

- Be submitted in writing.
- Include sufficient information to identify the individual.
- Be responded to within one month unless an extension is permitted by law.

Data Retention

Primary Sports Giants only keep information for as long as necessary.

Record	Retention Period
Child Registration Forms	Duration of attendance + 2 years
Attendance Registers	3 years
Medical Records	Duration of attendance + 3 years
Medication Records	3 years
Accident Records	Until the child reaches 21 years and 3 months (or in line with insurer advice)

Safeguarding Records	In accordance with safeguarding guidance and statutory requirements
Staff Personnel Files	6 years after employment ends
DBS Information	Only for as long as legally permitted
Financial Records	6 years in accordance with HMRC requirements

When information is no longer required, it will be securely destroyed.

Data Breaches

Any actual or suspected data breach must be reported immediately to the Director.

Primary Sports Giants will:

- Secure the affected information.
- Assess the level of risk.
- Record the breach.
- Investigate the cause.
- Notify the Information Commissioner's Office within 72 hours where required.
- Inform affected individuals where legally necessary.
- Review procedures to prevent recurrence.

Monitoring and Review

This policy will be reviewed:

- Annually.
- Following changes in legislation.
- Following significant organisational changes.

- Following serious data breaches.
- Following recommendations from the ICO or Ofsted.