



## Data Protection Policy

Heathfield Swim School / Swim Stars South East

Policy Written: 11<sup>th</sup> March 2026

Policy Review: 11<sup>th</sup> March 2027

### 1. Introduction

Heathfield Swim School and Swim Stars South East are committed to protecting the privacy and security of personal information entrusted to us by customers, staff, and other stakeholders. This Data Protection Policy outlines how we collect, use, disclose, and safeguard personal data, in compliance with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

### 2. Scope

This policy applies to all personal data processed by Heathfield Swim School and Swim Stars South East, whether collected through online platforms, paper forms, or other means. It applies to all staff, contractors, volunteers, and any third parties working on our behalf.

### 3. Principles of Data Protection

We commit to upholding the following principles when processing personal data:

- **Lawfulness, fairness, and transparency:** We process data legally and transparently.
- **Purpose limitation:** Personal data is collected for specific, legitimate purposes and will not be used for incompatible purposes.
- **Data minimisation:** Only the data necessary for operational purposes will be collected.
- **Accuracy:** Reasonable efforts will be made to ensure that personal data is accurate and up to date. Inaccurate data will be corrected promptly.
- **Storage limitation:** Data will only be stored as long as necessary for the purposes for which it was collected.
- **Integrity and confidentiality:** Personal data will be processed securely to prevent unauthorised access, loss, or damage.

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#### 4. Data Collection and Use

- **Collection:** Personal data, such as names, contact details, emergency information, and relevant health data (e.g., allergies), will be collected only for the purposes of lesson registration, communication, and ensuring the safety of participants.
- **Use:** We will use personal data solely for the purposes it was collected, such as scheduling lessons, safety protocols, and administrative processes. We will not process data for any other purposes without obtaining explicit consent, where required.

#### 5. Data Security

- **Technical and Organisational Measures:** Heathfield Swim School and Swim Stars South East will use appropriate security measures, both physical and electronic, to protect personal data.
- **Restricted Access:** Only authorised staff, contractors, and volunteers will have access to personal data, ensuring it is only accessed for legitimate purposes. Paper registers and any folders containing personal or confidential information will be closed and securely stored when not in use. These documents will be accessible only by those authorised.
- **Paper Registers:** Paper-based information, such as attendance registers, will be handled carefully. Registers will be securely stored in a closed folder, accessed solely by authorised personnel, and never left unattended in public areas.

#### 6. Data Subject Rights

Individuals have the following rights regarding their personal data:

- **Right of Access:** Individuals can request access to their personal data held by the swim school.
- **Right to Rectification:** Individuals can request that inaccurate or incomplete personal data be corrected.
- **Right to Erasure:** Under certain conditions, individuals may request that their personal data be erased.
- **Right to Restrict Processing:** Individuals can request restrictions on the processing of their personal data in certain circumstances.
- **Right to Object:** Individuals have the right to object to data processing, especially for marketing purposes.
- **Data Portability:** Individuals may request their data in a commonly used format to transfer to another service.

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Requests related to these rights should be directed to the Data Protection Officer at the contact information provided below.

## 7. Data Breach Notification

- **Procedure:** In the event of a personal data breach, we will notify the Information Commissioner's Office (ICO) and affected individuals within 72 hours of becoming aware of the breach if it poses a risk to individual rights and freedoms.
- **Details Provided:** The breach notification will include details of the nature of the breach, the data affected, and steps taken to address it.

## 8. Training and Awareness

- **Staff Training:** All staff, contractors, and volunteers who handle personal data will receive regular training on data protection laws and procedures.
- **Awareness:** Regular campaigns will ensure that all team members remain informed of their responsibilities in protecting personal data.

## 9. Policy Review and Updates

- **Review Cycle:** This policy will be reviewed annually or updated as necessary to ensure continued compliance with data protection laws.
- **Notification of Changes:** Any updates to this policy will be communicated to staff, contractors, and volunteers.

## 10. Contact Information

For any questions or concerns regarding this Data Protection Policy or our data protection practices, please contact our Data Protection Officer: **Elliott Stevens**

- Email: [admin@heathfieldswimschool.co.uk](mailto:admin@heathfieldswimschool.co.uk)

- Phone: 07710039552

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