

Sports, Wellness & Recreation CIC (SWR.CIC)

Data Protection and Privacy Policy

Organisation: Sports, Wellness & Recreation CIC (SWR.CIC)

Policy Title: Data Protection and Privacy Policy

Version: 1.0

Approved By: Board of Directors

Review Date: Annually

1. Purpose

Sports, Wellness & Recreation CIC (SWR.CIC) is committed to protecting the privacy and personal information of all participants, members, volunteers, staff, directors, partners, and members of the public.

This policy explains how SWR.CIC collects, stores, uses, shares, and protects personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

SWR.CIC recognises its responsibility to handle personal data lawfully, fairly, transparently, and securely.

2. Scope

This policy applies to:

- Directors
- Employees
- Volunteers
- Coaches and session leaders
- Members
- Participants
- Parents and carers
- Contractors and partners

The policy applies to all personal information processed by SWR.CIC in electronic and paper formats.

3. Data Protection Principles

SWR.CIC will ensure that personal data is:

Lawful, Fair and Transparent

Collected and used for legitimate purposes and explained clearly to individuals.

Purpose Limited

Only collected for specified and legitimate reasons.

Data Minimised

Limited to information that is necessary.

Accurate

Kept up to date and corrected where necessary.

Storage Limited

Retained only for as long as required.

Secure

Protected against unauthorised access, loss, misuse, or disclosure.

Accountable

Managed responsibly with appropriate policies and procedures.

4. Personal Data We May Collect

SWR.CIC may collect and process:

Participant Information

- Name
- Address
- Date of birth
- Email address
- Telephone number
- Gender (where required)
- Membership details

Parent or Guardian Information

- Names
- Contact details
- Emergency contact information

Volunteer and Staff Information

- Contact details

- DBS information (where required)
- Training records
- References
- Attendance records

Health and Emergency Information

Where necessary for safe participation:

- Medical conditions
- Allergies
- Emergency contacts
- Accessibility requirements

Images and Media

- Photographs
- Video recordings
- Promotional content

Where appropriate, consent will be obtained before use.

5. Why We Collect Personal Data

SWR.CIC processes information to:

- Deliver sports and community activities.
 - Manage memberships and registrations.
 - Communicate with participants and families.
 - Safeguard children and vulnerable adults.
 - Manage volunteers and staff.
 - Organise events and programmes.
 - Apply for grants and funding.
 - Meet legal and regulatory obligations.
 - Promote activities through marketing and social media.
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6. Lawful Basis for Processing

SWR.CIC processes personal data under one or more of the following lawful bases:

Consent

Where individuals have given clear permission.

Contract

To provide services or memberships requested.

Legal Obligation

To comply with laws and regulations.

Vital Interests

To protect someone's health or safety.

Legitimate Interests

To operate and improve SWR.CIC activities and services.

7. Children's Data

SWR.CIC recognises that children require additional protection.

Where personal information is collected from children under 18:

- Parents or guardians may be asked to provide consent.
 - Information will only be collected where necessary.
 - Safeguarding requirements will be followed.
 - Data will be protected with additional care.
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8. Photography and Video Recording

SWR.CIC may use photographs and videos for:

- Social media
- Marketing materials
- Funding reports
- Website content
- Community promotion

Consent will be sought where required.

Parents, carers, or participants may withdraw consent at any time by contacting SWR.CIC.

9. Sharing Information

SWR.CIC will not sell personal information.

Information may be shared where necessary with:

- Funding organisations
- Partner organisations
- Sport's governing bodies
- Local authorities
- Emergency services
- Safeguarding agencies
- Professional advisers

Information will only be shared when there is a lawful basis for doing so.

10. Data Security

SWR.CIC will take reasonable measures to protect information including:

- Password-protected systems
- Secure cloud storage
- Restricted access to personal data
- Secure disposal of records
- Regular review of data handling practices

Directors, staff, and volunteers must take appropriate care when handling personal information.

11. Data Retention

Personal data will only be retained for as long as necessary.

Typical retention periods may include:

Record Type	Retention Period
Membership records	Up to 6 years
Financial records	6 years
Safeguarding records	As required by safeguarding guidance
Volunteer records	Up to 6 years after involvement ends
Accident reports	Up to 6 years
Photographs and promotional materials	Until consent is withdrawn or no longer required
Records will be securely deleted or destroyed when no longer needed.	

12. Individual Rights

Under UK GDPR, individuals may have the right to:

- Access their personal information.
- Correct inaccurate information.
- Request deletion of information.
- Restrict processing.
- Object to processing.
- Withdraw consent.
- Request transfer of information where applicable.

Requests should be made in writing to SWR.CIC.

13. Data Breaches

Any actual or suspected data breach must be reported immediately to a director.

SWR.CIC will:

- Investigate the breach.
 - Take action to minimise risk.
 - Notify affected individuals where necessary.
 - Report serious breaches to the Information Commissioner's Office (ICO) where required.
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14. Contact Details

For questions regarding data protection or privacy:

Sports, Wellness & Recreation CIC (SWR.CIC)

Email: swrcic@gmail.com

Individuals may also contact the Information Commissioner's Office (ICO) regarding concerns about the handling of personal data.

15. Policy Review

This policy will be reviewed annually by the Board of Directors or sooner if legislation or organisational circumstances change.

Approval

Approved by the Board of Directors of Sports, Wellness & Recreation CIC.

Director Name: _____Khalid Walker_____

Signature: _____K.Walker_____

Date: _____9th April 2026_____

Review Date: _____9th April 2027_____