




**PHYSICAL EDUCATION & ACTIVE KIDS**

# GDPR, Privacy & Data Protection Policy

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PLANNED REVIEW: Annual	PREPARED BY: David Johnson CEO 	PLANNED REVIEW DATE: 01/07/2024

The General Data Protection Regulation (GDPR) and the current Data Protection Act regulate our use of your personal data. As an employer it is our responsibility to ensure that the personal data we process in relation to you is done so in accordance with the required principles. Any data held shall be processed fairly and lawfully and in accordance with the rights of data subjects.

We will process data in line with our privacy notices however we utilise a series of GDPR compliant portals to store data.

- For our wrap-around care provision and holiday camps, child and parent data is stored on Coordinate Sport's secure booking system. Their privacy notice can be found at <https://coordinate.cloud/privacy/>.
- When working with pupils in a school we utilise a system called IPEP which is a product from Complete Education Solutions, their privacy policy can be found at <https://completeeducationsolutions.uk/wp-content/uploads/2021/05/CES-Privacy-Policy-2019.pdf>.
- All data relating to our learners on apprenticeships is stored on Aptem e-learning portal, their privacy notice can be found at <https://www.aptem.co.uk/privacy/>.
- Employee data is stored securely on BrightHR, a system provided by Peninsula UK, their privacy policy is available at <https://www.brighthr.com/terms/?tab=privacy>
- All reported safeguarding issues are stored on MyConcern, a portal provided by The Safeguarding Company, you can access their privacy notice at <https://www.thesafeguardingcompany.com/company/privacy/>

We commit to ensuring that your rights with regard to your personal data are upheld in accordance with the law and have appropriate mechanisms for dealing with such.

We may ask for your consent for processing certain types of personal data. In these circumstances, you will be fully informed as to the personal data we wish to process and the reason for the processing. You may choose to provide or withhold your consent. Once consent is provided, you are able to withdraw consent at any time.

All members of staff who represent Physical Education & Active Kids Ltd are required to comply with all company policies and procedures in relation to processing data. Failure to do so may result in disciplinary action up to and including dismissal.

When handling data from 3<sup>rd</sup> parties e.g. customer/child information with regard to Community activities and learner data for apprenticeships, PEAK utilise 3<sup>rd</sup> party systems such as Coordinate and APTEM. PEAK will always ensure that 3<sup>rd</sup> party systems are GDPR compliant and will hold copies of the 3<sup>rd</sup> party system's data protection policy on file.

Customer data will be stored securely and PEAK retain the right to utilise this for our own marketing purposes. Any marketing utilising customer data will only be done via electronic mail. We will never share customer data with any third party. Customers have the right to request that their data is removed from our records at any time by emailing [info@peak-sport.co.uk](mailto:info@peak-sport.co.uk).

## Privacy Notice

Physical Education & Active Kids Ltd. is an independent company. This privacy document explains how we use your personal information that we collect about you.

### What information do we collect about you?

We collect information about you when you enter into a contractual obligation with us. We only collect information that is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. All of the information we collect is provided by you prior to the contract commencing. A complete record of the data we collect and why we collect it is contained in the appendices of this document.

### How will we use the information about you?

We collect information about you to process your contract, manage your account and if you agree, to email you about products and services we think may be of interest to you.

Physical Education & Active Kids Ltd. will not share your information with any third party.

### Marketing.

We will only send information about products and services to personal e-mail addresses if you have consented to receive marketing. You may opt out at a later date.

We will send information about products and services to e-mail addresses that are in the public domain only if that information is relevant to your industry sector. You may opt out of receiving such information and we will ensure that the relevant e-mail address is expunged from our public sector database.

You have the right to at any time to stop us from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes you can request that we stop by e-mailing us at [info@peak-sport.co.uk](mailto:info@peak-sport.co.uk).

### Access to your information and correction.

You have the right to request a copy of the information we hold about you. If you would like a copy of some or all of your personal information, please write to us at the following address:

Physical Education & Active Kids Ltd  
North East Business and Innovation Centre  
Enterprise Park East  
Wearfield  
Sunderland  
SR5 2TA

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

### How is your information stored?

PEAK use a cloud-based system for file storage which is backed up regularly onto a hard drive which is kept in a locked storage box. The only people who have access to the files that contain personal data are directors and senior managers.

### Changes to our privacy policy.

We keep our privacy policy under regular review and we will inform all of our clients of any update. This privacy policy was last updated on 24<sup>th</sup> May 2018.

#### [How to contact us.](#)

Please contact us if you have any questions about our privacy policy or information we hold about you.

- By email at [info@peak-sport.co.uk](mailto:info@peak-sport.co.uk)
- Or write to us at Physical Education & Active Kids Ltd, NE-BIC, Enterprise Park East, Wearfield, Sunderland, SR5 2TA.

## Appendices

1. GDPR Processes in conjunction with Open Play for Active Academy Customers
2. A record of the data we hold and why we need it – Client schools
3. A record of the data we hold and why we need it – Active Academy customers
4. A record of the data we hold and why we hold it – Employees

## Appendix 1

### GDPR Processes in conjunction with Coordinate for Holiday Camp and wrap-around service Customers

#### How do we provide opt-in?

Coordinate will include manual confirmation to agree to both Coordinate and PEAK T&Cs.

A secondary marketing opt-in checkbox will be appearing on confirmation page.

All opt-in confirmations will be timestamped as per GDPR requirements

#### How do we provide right to be forgotten?

In the customers' profile section, information on how a customer can ask to be removed will be added - this will entail a manual process where the customer must provide written confirmation of their request to be removed and Coordinate will implement the following process:

- All booking information related to the user will be anonymised and you will not be able to see that users' information when viewing their bookings
- Invoice and booking history will still be available for that user
- A note of any users who will be anonymised is noted and the same anonymisation process will be performed on any backups Coordinate may restore.

#### How do we provide data on what is held on a customer

In the customer profile section, information on how a customer can ask to be supplied with information we store will be added - this is a manual process but will result in the customer being supplied a JSON/CSV data file including all information from Coordinate database. An example copy of this can be supplied.

#### Re-requesting consent

The onus on re-requesting consent for email marketing stands with PEAK who will ensure that all customers are contacted before email communications have been sent.

Before exporting any user data either from the customers section or reporting section, each staff/user account accessing these sections must digitally sign that they have performed this action and that they have access to export data.

#### Restricting of processing

Customers will be able to manually ask for restriction of further processing on their account (by sending an email to Coordinate). Coordinate will then lock down the customers details and prevent further changes to the data, making it read only.

#### Age checks

For any courses that are tagged as child courses, an extra field will appear confirming that the booking is being completed by an individual over the age of 16.

#### Terms and conditions

There will be a new section under client settings where PEAK will include all uses of the customer data (either booking data or custom/attendee questions) outside of Coordinate i.e. "We ask for dietary requirements to supply correct food on the day of course".

Each extension that PEAK enable in Coordinate will also have its own terms to be appended to this list.

#### Automated anonymising of data

Specific information which can identify a customer via booking data will be anonymised after 12 months, this includes:

- First name
- Address
- Email
- Phone number

All this information will not be included in any reports generated by the system, instead replaced with a "-"

Saved attendees data will be anonymised after 18 months of first use, including the following fields:

- Last name
- Address
- Phone number

Customers will be able to re-add this information when next making a booking

## Appendix 2

A record of the data we hold and why we hold it – client schools

Data	Reason for Data Processing	Lawful Basis
School Name and Address	For PEAK staff to be able to navigate to attend sessions at the school.	Contract
School Telephone Number	For PEAK staff to be able to contact the school.	Contract
Headteacher Name and email address.	For PEAK staff to know main point of contact and communicate with them.	Contract
Business manager name and e-mail address.	For PEAK staff to be able to process account details of the school and to invoice for services.	Contract
PE Co-ordinator name and e-mail address.	For PEAK staff to communicate regarding subject specific matters.	Contract
Timetable	For PEAK staff to know which classes they are working with, when and where.	Contract
Staff Names	(PECS only) For PEAK staff to plan and co-ordinate CPD sessions.	Contract
Staff SWOT Analysis and Training Goals	(PECS only) For PEAK staff to plan and co-ordinate CPD sessions.	Contract
Staff Session plans and training logs	(PECS only) for PEAK staff to plan and co-ordinate CPD sessions.	Contract
Staff impact data	For PEAK staff to record and measure impact of their work in the school.	Contract

As part of our contractual obligation to schools we also offer a pupil monitoring process for which we require class lists and we produce ability-based data on each pupil. This data does not belong to Physical Education & Active Kids and it remains the property of the client school.



### Appendix 3

A record of the data we hold and why we hold it – Holiday Camp and WAC Customers

Information	Reason for Data Processing	Lawful Basis
Child's Name	For PEAK staff to monitor attendance and to know how to address the child.	Contract
Child's Date of Birth	To ensure that the child is eligible to attend the Active Academy.	Contract
Child's School	For PEAK staff to monitor effectiveness of leaflet marketing campaigns.	Contract
Child's medical/nutritional information	For PEAK staff to be able to ensure that the child remains safe whilst attending the Active Academy.	Contract
Home address and telephone number	For emergency contact purposes.	Contract
2 x emergency contacts, names, relationship to child and telephone numbers	For emergency contact purposes.	Contract
Parent E-Mail Address	For marketing purposes should consent be given and also for Active Academy confirmation e-mails.	Contract/Consent
Photographic Consent	To ascertain whether child's image can be used for publication on public sites.	Consent

## Appendix 4

### A record of the data we hold and why we hold it – Employee Data

Information	Reason for Data Processing	Lawful Basis
Employee Name and Address	Payroll and DBS requirements	Contract
Employee Contact Telephone Numbers	To enable contact with employee	Contract
Employee gender	Equal opportunities monitoring	Contract
Employee email address	To enable contact with employee	Contract
Employee exam results	Suitability for work	Contract
Employee prior employment	Suitability for work	Contract
Referee information	Suitability for work	Contract
Pre-existing medical conditions	Equal opportunities monitoring	Contract
Contract start and finish dates	Payroll purposes	Contract
Job Title	Contract purposes	Contract
National Insurance Number	Payroll and DBS purposes	Contract
Bank Account Details	Payroll purposes	Contract
Emergency contact	Employee wellbeing/safety	Contract
Kit sizes	To purchase correct kit	Contract
Wage hourly rate	Payroll purposes	Contract
Contract hours of work	Payroll purposes	Contract
Holiday entitlement	Payroll purposes	Contract
Annual leave record	Payroll purposes	Contract
Sickness absence record	Sickness absence monitoring, payroll and future reference request purposes	Contract
Copies of any issued letters from company	Disciplinary records and staff file for future reference request purposes	Contract