



Lynda Chambers trading as

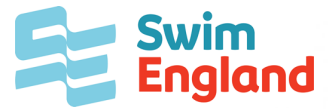
# Seahorse School of Swimming

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## Privacy Policy

03/05/2018 Version 1.0

1. Seahorse School of Swimming is committed to providing safe, high quality swimming lessons and collects information from a person for this reason. Our contact details are above. This privacy policy sets out how we collect their information, process and retain in ways that comply with the General Data Protection Regulation (GDPR) from 25/05/2018.
2. Lynda Chambers is the person acting as the Data Controller (the person responsible for information when people give it to Seahorse School of Swimming).
3. Seahorse School of Swimming provide lessons to children and adults. Most people learning are children, so the policy is intended to be for an adult swimmer or the swimmer's or parent or guardian (when the swimmer is under 18 years of age or has a guardian to support them for another reason). The terms 'they', 'them' or 'their' refers to the swimmer if they are an adult or the parent/guardian as appropriate.
4. At the point a person agrees to have lessons with Seahorse School of Swimming, we ask them or their parent or guardian (if they are under 18 or a parent or guardian supports them for other reasons) to consent in writing to collect their information using a registration form. We ask them to provide the information, so they can decide whether to give us the information at all and what information is given.
5. The information requested is:
  - a. Their name
  - b. Their age
  - c. Their parent's/guardian's name (if they have one)
  - d. If they have previously been given a swimming certificate or badge
  - e. An email address
  - f. A mobile and/or home telephone number
  - g. Medical conditions they wish to tell Seahorse School of Swimming about

- h. Allergies they wish to tell Seahorse School of Swimming about
- i. Any other information they wish to tell Seahorse School of Swimming about
- j. How the person paying for the swimming lessons intends to pay.

6. The reason for collecting each piece of information is:

- a. Their name – so it can be added to the register the swimming teachers use at swimming lessons. This is for safety in case the pool needs to be evacuated and to let the teacher know what stage of swimming a person is working on. The register is used to show when a payment has not yet been made for a lesson.
- b. Their age – so the swimming teacher can plan best how they teach them.
- c. Their parent's/guardian's name (if a person have one) – so Lynda Chambers at Seahorse School of Swimming knows who is responsible for them.
- d. If they have previously been given a swimming certificate or badge – so the swimming teacher knows what they should be taught next to improve their swimming.
- e. An email address – so Seahorse School of Swimming can notify people about cancellations of lessons, rescheduling of lessons, other information about lessons and opportunities for intensive courses. People do not have to provide an email address and can look at the swim school's Facebook if they prefer, but this may mean they will not be aware of a cancellation at short notice. Email is also used to communicate about payment and certificates, awards and to discuss any issues or complaints that may arise with the swim school or other things linked to swimming lessons.
- f. A mobile and/or home telephone number – so Seahorse School of Swimming can telephone an adult swimmer, a parent or guardian in emergency or urgent situations or if they request Seahorse School of Swimming to call them.
- g. Medical conditions they wish to tell us about – so we can make sure their teacher or the teacher managing the swimming session knows about things that could make a difference to their safety or other people at the pool.
- h. A single record of all the people having lessons that have told Seahorse School of Swimming about medical conditions is kept securely to show when their teacher was told, because this information is important for the safety of everyone having lessons; especially the people with a medical matter they want to tell Seahorse School of Swimming about.
- i. Allergies they wish to tell us about – so Seahorse School of Swimming can make sure the teacher is aware of information that could be important if they have a reaction to something whilst they are at the pool.
- j. Any other information they wish to tell us about – this might include information about additional support or needs around learning, so they make the best progress. It might include information about their faith or ethnicity/heritage if a person want Seahorse School of Swimming to take action or avoid doing things that would make it difficult for a person to have swimming lessons or make progress with their swimming.

- k. How the person paying for the swimming lessons intends to pay – so Seahorse School of Swimming can check payment for lessons and mistakes are avoided.
7. Seahorse School of Swimming uses a website [www.seahorseschoolofswimming.co.uk](http://www.seahorseschoolofswimming.co.uk) This website does not collect information. We use cookies, just to track visits to our website, we store no personal details.
8. Seahorse School of Swimming has a Facebook Account [www.facebook.com/seahorseschoolofswimming/](http://www.facebook.com/seahorseschoolofswimming/) and a Facebook Page. These are used alongside email to advise people who are 'friends' on Facebook or like/follow the Facebook Page about things like a swimming pool being unavailable.
9. When they connect to Seahorse School of Swimming using Facebook, their contact details are stored within Facebook and not shared.
10. If they makes contact via Facebook, they will always be asked to complete a registration form and consent in writing to give us their information when they decide a to have lessons with Seahorse School of Swimming.
11. If Seahorse School of Swimming wishes to take photographs of a person for publication on their website or Facebook they will seek additional written consent in line with Swim England's Wavepower guidance on child protection (2016-2019 p.116). This level of consent, in writing will be used for adults and children alike.

#### How long does Seahorse School of Swimming keep their information?

12. The registration form is kept for as long as they have lessons with Seahorse School of Swimming.
13. The email address given to Seahorse School of Swimming is used for as long as they have lessons with Seahorse School of Swimming.
14. Information relating to medical matters is kept for as long as they have lessons with Seahorse School of Swimming.
15. Registers used at pools are kept for one year unless subject of an investigation linked to a complaint.
16. Information about payments, complaints, incidents at the pools or other investigations are kept for six years after the year of the incident being investigated, as this is set out in law or best practice.

#### How does Seahorse School of Swimming keep their information secure?

17. All the electronic information Seahorse School of Swimming stores is protected by passwords. If it is kept in 'the cloud' the accounts are password protected. The 'cloud' storage used (iCloud Drive and Google Drive) have stated their systems meet the standards set out in the GDPR. The information may be hosted outside the European Economic Area (EEA), but where this happens it is kept within the EU-US Privacy Shield to protect the information
18. Every computer used to access information held by Seahorse School of Swimming is secured with its own password.

19. Email accounts used are also password protected.
20. Different passwords are used for different devices/computers/accounts
21. Medical information in 'the cloud' has an additional password encryption to protect the document, which is known only to the Data Controller and one additional teacher, so important medical information can be kept up to date and removed when no longer needed.
22. Registers used at swimming pools are viewed and filled in at the pools by the teachers or their assistants using electronic versions on the teachers' own mobile devices. This prevents the risk of the register being lost or read by someone else.
23. Briefings about medical information are made in person or by telephone to ensure medical information can't be lost or misdirected.
24. Paper registration forms, teacher records (such as Disclosure and Barring Scheme (DBS) records, notes of references and identity documents) are kept in locked storage in a secure office at the Data Controller's home. The office is secured with good quality windows and doors and protected with a burglar alarm.

When Seahorse School of Swimming has finished with their information how is it disposed of safely?

25. Electronic records stored in 'the cloud' are deleted permanently (removed from 'trash' or 'bin').
26. Electronic records stored on computers are destroyed using a shredding application
27. Contacts including email addresses are deleted from email accounts
28. Email addresses stored in applications or software used to send emails in groups are deleted individually
29. Paper records are shredded using a cross-cut shredder or incinerated under the supervision of the Data Controller at their home.

### Rights regarding information

30. If anyone wishes to complain about how Seahorse School of Swimming has collected, used or kept their information, they can complain to the Data Controller and, where possible, steps will be taken to resolve it to their satisfaction.
31. People have the right to have any information they have given to Seahorse School of Swimming deleted/removed on request unless it must be kept. People have the right to tell Seahorse School of Swimming to stop using the information they have provided.
32. People have the right to know what information Seahorse School of Swimming is currently holding about them. This is known as a Subject Access Request or SAR. To make an SAR to Seahorse School of Swimming, they simply make the request in writing. Seahorse School of Swimming will then have 30 days to respond with details of the information held, or an explanation why they cannot do so.
33. People's rights can be seen here <https://ico.org.uk/for-the-public/>

## Sharing

34. Seahorse School of Swimming will never share information it collects unless required to do so by law.