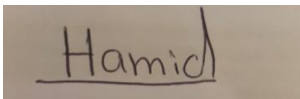




Data Protection Policy (GDPR)

Approved by:	H Anwary
Signed:	
Date approved:	Mar 2026
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V3	May 2024	Policy written
V3.1	Apr 2025	Tweaked working and typos
V3.2	May 2025	Added process information
V3.3	Mar 2026	

Data Protection Policy (GDPR)

Statement of Intent

Active Swim is committed to ensuring the confidentiality and safe storage of personal or sensitive data for all individuals engaged in activities concerning the assessment, delivery, and award of Swim England Qualifications and CPD.

Definition of data

Data refers to information about an individual that *Active Swim* may use or process to carry out activities involved in the assessment, delivery and award of qualifications. Data can be identified by two categories:

- **Personal data:** Information that relates to an individual, identifiable from the data, or the data along with additional information that is already in possession or likely to come into possession. This includes information about the individual, such as facts and opinions, which can be held electronically or on paper.
- **Sensitive personal data:** Information about an individual relating to racial or ethnic origin, political opinions, religious beliefs, physical or mental health or condition, sexuality, the commission or alleged commission of any offence, criminal proceedings or convictions under GDPR. Genetic and biometric information is also deemed sensitive.

General Data Protection Regulations 2018

The six principles of GDPR (General Data Protection Regulations) are similar to the eight principles of the Data Protection Act. At the same time, the six principles of GDPR do not include individuals' rights or overseas transfers.

1. **Personal data will be processed fairly and lawfully.**

There must be a legitimate reason for collecting and using the data, and the individual must be aware that their data will be used. Under GDPR, the law requires justification for conducting criminal record checks on employees.

2. **Processed for specified, lawful and compatible purposes**

The reasons for obtaining personal data must be clear and open.

3. **Adequate, relevant and not excessive**

Sufficient data is held on the individual to do the job, and no further information is required.

4. **Accurate and up to date**

Reasonable steps are taken to ensure the information is accurate and up to date.

5. **Not kept for longer than necessary**

The reasons for keeping the information must be considered, and the duration of its retention must be reviewed accordingly. Photo ID will be destroyed at the end of the course.

6. **Processed in accordance with the rights of the individual and with appropriate security**

GDPR provides certain rights to individuals, such as the right to view information held about them, the right to prevent processing of their personal information, and the right to say no to marketing communications.

There must be an awareness of how personal and sensitive personal data is protected, i.e., locked filing cabinets, password protection, and regular password changes.

Complying with the General Data Protection Regulations

Active Swim will ensure that:

- The organisation is registered with the Information Commissioner's Office (ICO)
- All members of staff, Internal Verifiers, Tutors, Assessors, Learners, Staff and Centre Staff, whether permanent or temporary, have access to this Policy and understand the six principles of GDPR
- All forms or documents which collect personal or sensitive data include a Data Protection statement.
- All records are accurate and up to date, including achievement data and are sent to Swim England for certification.
- Keep information secure—Ensure that all information passed to you in your role is held securely, whether paper or electronic. If it is a paper copy, it must be scanned and stored electronically, and it must be password-protected. The paper copies are shredded.
- Ensure information is used confidentially.
- No data is used for third-party marketing unless the individual provides written consent.
- **Any e-mails sent to multiple individuals are BCC'd (blind copied). Any emails to those under 18 will be copied to at least one other responsible person.**
- **Tutors will not be communicating via WhatsApp with learners.**
- No personal data is disclosed to anyone outside the organisation, written or verbal. However, all records are accurate and up to date, including achievement data and are sent to Swim England, Safety Training Awards and RLSS UK Qualification for certification.
- Only nominated staff members can access personal data and understand how to comply with the Act.
- During Swim England courses, a drop box is shared with learners. OneDrive is password-protected, and you access it with your email, where all course resources are stored.
- For the Personal Learning Record to obtain a Unique Learning Number (ULN), only authorised users will have access to the organisation portal and will have been vetted by the organisation.
- Achievement data is not used for any other purpose than those permitted in this policy, including for marketing or financial gain.
- On completion of the work required for the information, the relevant information related to learners is securely destroyed by *Active Swim*. Methods of securely destroying documents include:
 - shredding – preferably cross-shredded
 - incineration
 - use of a commercial disposal company

Data protection statement

Active Swim has proposed a data protection example.

“Active Swim, which collects and will use your data for your involvement in the learning at Active Swim. I understand that by submitting my data, I consent to receive information about the course I have booked and relevant information such as newsletters by post, e-mail, SMS/MMS, online or telephone unless stated otherwise.” Please refer to our Data Protection Policy for further information

Privacy notices

Under GDPR, all organisations that process learner data must ensure learners are informed of how their data is processed and shared. A privacy notice informs learners about how their information is collected, what it is used for, and who uses it.

A privacy notice must be provided to the learner at the point of application or registration for a Swim England qualification, along with the opportunity to opt out if they do not wish to share their data.

How do we process and look after your data?

We may ask you to provide information to us or collect data from you on different occasions, including at several points on the site, such as when you:

- e-mail enquiries
- register to receive information
- purchase services from us
- **for registration and certification purposes with the appropriate awarding body**

What information do we collect?

Course learners and potentially interested individuals

Area:	The information is utilised to:
Name	Book the learner onto the courses, registration and certification.
Address	Register the course for invoicing purposes
Date of birth	complying with registration purposes with the awarding body
Phone	call or send out text messages for urgent and important notices
Email address	communicate with our clients; this may include newsletters, invoicing, promotions and dealing with enquiries
Any medical / learning needs	to offer the appropriate support
Emergency contact details	

All paper copies are deleted/shredded at the end of the course. Learners are required to confirm their identity on the first day of the course by presenting a form of ID (e.g., passport, driving license, or an acceptable form of photo identification).

Customer details for the Swimming lessons for the swim teacher training courses

Area:	The information is utilised to:
Parent's Name	Book the carer's learner onto the training.
Child's Name	Book the swimmer into the class.
Date of Birth	complying with registration purposes with the awarding body
Ability of the child	Ensure the child is at the most suitable level of the group.
Phone	call or send out text messages for urgent and important notices
Email address	communicate with our clients; this may include newsletters, invoicing, promotions and dealing with enquiries
Any medical / learning needs	to offer the appropriate support
Emergency contact details	

How do we store your data?

A central database is maintained and stored securely with password protection. No third party has access to your data, and it is not shared with other businesses except for the Awarding Bodies mentioned in this policy. If you require your data to be deleted sooner, please let us know. For RLSS UK Qualifications, data is uploaded onto the RLSS Tahdah platform, which RLSS UK

secures. For SEQ, data is uploaded to Parnassus (a secure system used by SEQ). For STA, this would be the STA Online portal. Information retained includes the Learner and Existence Record check and attendance registers. Any learner registration and certification will be retained for 7 years, then periodically reviewed and deleted.

How can you keep your data up to date?

If you need to change any of the details that we have, please email us at info@activeswim.co.uk

What happens when my course has finished?

We will continue to send you newsletters and promotional emails unless you ask us to stop. Please email us at info@activeswim.co.uk

If you do not want to receive information from us.

How can my data be removed?

If you wish to be removed from our database, please email us at info@activeswim.co.uk

Sharing information

We will share your information with our affiliates and third-party service providers if necessary or reasonably required for any of the purposes above. Such third-party service providers are not entitled to use your information. The database is only accessed by the Active Swim Administrator and the Director of Education and Development, info@activeswim.co.uk

Teachers are given registers to record and be aware of any swimmer's needs at swim school. The registers will contain the Child's full name, age, swim level attendance, and medical/learning needs.

Tutors will have access to learners' full names, email addresses, and mobile numbers, which will only be used through online data storage systems. This personal data is used solely for course purposes during the course.

Personal learning record

The Personal Learning Record is an internet-based register of learners and achievement data designed to assist learners with their personal learning development. It allows learners to view their qualifications in one place. A unique learner number (ULN) is required to access the learner's personal learning record.

Active Swim is responsible for creating and providing a valid ULN for learners who do not already possess one. It is also responsible for notifying the learners that their data will be processed to create a ULN and maintaining their learning records in the form of a privacy note.

Protection of information

We are committed to protecting your privacy and implementing various security measures concerning our data processing and transfer. However, the nature of the Internet means that data may, in some circumstances, flow over networks without full security measures and could be accessible to unauthorised persons.

Your details are stored on Swim Biz, and this ThinkSmart Software takes all proportional steps to safeguard your data from unauthorised access. All ThinkSmart Software servers are protected by multiple redundant firewalls and intrusion detection and prevention systems that are regularly monitored and tested. 256-bit Secure Sockets Layer (SSL) data encryption is employed to protect all data access across the internet

Links

Our site may contain links to other sites. Please be aware that we are not responsible for the privacy practices of these sites. We encourage our users to be aware of the privacy statements on any sites they visit. This Privacy Policy does not apply to information collected on third-party sites.

Your right to access information

You have the right to access Active Swim's information about you. To do this, please make a written application to **Hamid Anwary** at the following address:

Mr H Anwary
10 Burgundy Court
31 Arla Place
Ruislip
HA4 0GD

info@activeswim.co.uk

You may be required to verify your identity and pay an administrative statutory fee (currently £10.00) to obtain a copy of the information it holds. Please note that in certain circumstances, Active Swim may withhold access to your information, which it has the right to do under current Data Protection Legislation.

Updating your information

If your personal information, such as your contact details, changes, please let us know as soon as possible in writing to *Active Swim* so that we can keep your information up to date and accurate.

Mr H Anwary
10 Burgundy Court
31 Arla Place
Ruislip
HA4 0GD

hamid@activeswim.co.uk