



Crawley Swimming Club

Confidentiality and Data Protection Policy

Responsible Officers: Lead IT Secretary and Enquiries Secretary

1. Purpose of this Policy

This policy sets out how Crawley Swimming Club (“the Club”) protects personal information and ensures confidentiality in accordance with UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, Swim England guidance and good practice for sports clubs. Its purpose is to ensure that all members, parents/guardians, volunteers, coaches Trustees and sub-committee members understand their obligations to maintain confidentiality and safeguard personal information.

2. Scope

This policy applies to:

- All Club members and parents/guardians
- All volunteers, coaches, teachers, officers, Trustees and Committee members
- Anyone processing personal data on behalf of the Club

It covers all personal and special-category information held on paper or digital form.

3. Key Definitions

Personal Data: Information that identifies a living individual.

Special Category Data: Sensitive information such as medical data, disability information, safeguarding records.

Processing: Any use of data—collecting, storing, sharing, editing, deleting.

Data Controller: Club Lead IT Secretary and Enquiries Secretary

Data Protection Lead (DPL): The individuals responsible for compliance — Lead IT Secretary and Enquiries Secretary

4. Legal and Governance Framework

The Club complies with:

- **UK GDPR**
- **Data Protection Act 2018**
- **Swim England Data Protection & Privacy Guidance**
- **Information Commissioner’s Office (ICO) guidance for small organisations**
- **Wavepower safeguarding procedures** for confidential safeguarding record handling and record keeping (log)

5. Data Protection Principles

The Club will ensure that all processing of personal data is:

1. Lawful, fair and transparent.
2. Collected for specific purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and kept up to date.
5. Kept no longer than necessary.
6. Secure, both technically and organisationally.

6. Lawful Basis for Processing

The Club will document lawful requirements including:

- **Contractual necessity** (membership administration, meet entry)
- **Legal obligation** (safeguarding, HMRC, health and safety)
- **Legitimate interests** (reasonable club operations)
- **Consent** (photos, video, marketing, social media, special-category data)

Special category data requires a qualifying condition such as explicit consent or safeguarding necessity.

7. Confidentiality Requirements

All Club personnel must:

- Treat all personal, medical and safeguarding information as confidential.
- Only access information required for their role.
- Not share personal information except on a strict “need to know” basis.
- Not store club data on unapproved personal devices.
- Report confidentiality breaches immediately to the DPL.

8. Safeguarding Records

Safeguarding disclosures must be:

- Shared only with the Welfare Officer(s), the Swim England Safeguarding Team, or statutory agencies.
- Stored securely in restricted-access files.
- Retained in line with Swim England’s Wavepower guidance.

9. Data Sharing

The Club may share limited data with Swim England, event organisers, timekeepers, payment processors, IT systems and emergency services. Sharing must be lawful, documented and minimal.

10. Rights of Members

Members have the right to:

- Access their own personal data
- Rectify inaccurate data
- Request deletion (where appropriate)
- Withdraw consent
- Object to certain processing through the DPL

11. Retention & Deletion

Example retention periods:

- Membership records: membership period + 2 years
- Safeguarding records: as required by Wavepower (long-term)
- Financial records: 6+ years

12. Security Measures

The Club will maintain:

- Secure digital systems with passwords and access controls
- Secure storage for any paper files
- Regular training for volunteers, trustees and sub-committee members
- Data minimisation in communications

13. Breach Reporting

Any actual or suspected breach must be reported immediately to the DPL. The DPL will assess and report to the ICO within 72 hours if legally required.

14. Training

All new volunteers and coaches must receive a confidentiality and data-protection briefing by the DPL. Annual refresher training will be provided to key personnel.

15. Policy Review

Reviewed annually or following any major legal or Swim England guidance updates.

December 2025