Khegai Taekwondo Club

Data Protection Policy

Policy owner: Khegai Taekwondo Club
Club contact: ana@khegaitaekwondo.com | 01223 910776
Applies to: Club owner, instructors, assistants and anyone authorised to handle club information
Version: 1.0
Adoption date: 3/11/2026
Review date: Annually after adoption

1. Purpose

Khegai Taekwondo Club is committed to protecting the personal information of children, parents, guardians and other individuals involved in the club.

This policy explains how the club collects, uses, stores, shares and deletes personal information. It is intended to support compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The club recognises that children's personal information requires particular care and protection.

2. Who is responsible?

The Club Owner acts as the Data Controller and is responsible for:

- Deciding why and how personal information is used.
- Ensuring information is collected fairly and lawfully.
- Keeping personal information accurate and secure.
- Responding to privacy questions and data protection requests.
- Reviewing this policy and the club's data-handling arrangements.

An authorised assistant or instructor may only access information needed for their specific responsibilities.

3. What information may the club collect?

Depending on the individual's involvement, the club may collect:

- **Contact and identity information:** names, dates of birth, addresses, telephone numbers and email addresses.
- **Parent or guardian information:** names, contact details and relevant information confirming responsibility for a child.
- **Class administration information:** registration details, attendance, membership and payment records.
- **Emergency information:** emergency contact details and information needed to respond to an emergency.
- **Health information:** relevant medical conditions, allergies, injuries or other health needs that may affect safe participation.

- **Safeguarding and incident information:** records of concerns, accidents, incidents, complaints or actions taken.
- **Photography and filming preferences:** records of permissions and restrictions relating to photographs and videos.

The club will collect only information that is relevant and necessary for its activities.

4. Why information is collected and used

Personal information may be used to:

- Register students and manage membership.
- Organise classes and record attendance.
- Communicate with parents and guardians.
- Contact appropriate people in an emergency.
- Support safe participation in Taekwondo activities.
- Record and respond to accidents, incidents, complaints and safeguarding concerns.
- Manage payments and meet accounting requirements.
- Record photography and filming permissions.
- Meet applicable legal, insurance and safeguarding responsibilities.

Information will not be used for unrelated purposes without an appropriate lawful basis and, where required, further information or permission.

5. Lawful and fair use

The club will identify an appropriate lawful basis under the UK GDPR for each purpose for which personal information is processed.

Where health information is collected, the club recognises that it is special category personal data. Before processing it, the club must identify and document both an Article 6 lawful basis and an appropriate Article 9 condition.

The club will not assume that signing a general registration form automatically provides all necessary permissions for processing health information.

6. Storage and security

The club will take reasonable steps to protect personal information against unauthorised access, loss, alteration or disclosure.

The club's planned storage arrangements are:

- Ordinary digital records will be held on a password-protected work laptop. ● A restricted private OneDrive folder will be used as a backup where appropriate. ● Health information will be kept separately from ordinary registration and payment records.
- Safeguarding records will be kept in a separate, clearly labelled folder with access restricted to people who need the information for safeguarding responsibilities. ● Accident and incident reports will be stored securely and separately from ordinary registration records.

● Paper forms will be scanned and retained digitally where appropriate. Paper copies will be securely disposed of when no longer needed.

Passwords and access details must not be shared with unauthorised people.

7. Access to information

The Club Owner will normally manage club records.

An assistant or instructor may receive access only to information necessary for their role. For example, information needed to respond safely to an emergency may be shared with an authorised person where appropriate.

Venue staff will not routinely have access to club records. Relevant information may be shared with them where necessary, for example in an emergency.

8. Sharing information

The club will not sell personal information or share it routinely with unrelated organisations.

Information may be shared where necessary and appropriate for:

● An emergency or immediate safety concern.
● A safeguarding concern or referral.
● An insurance matter.
● A legal obligation or lawful request.
● Obtaining appropriate professional advice.

Only information relevant to the particular situation will be shared.

9. Retention and deletion

Personal information will not be kept for longer than necessary for the purpose for which it was collected.

The club will maintain a retention schedule covering registration, health, attendance, financial, accident, incident and safeguarding records.

The current intended approach is:

● Health information will normally be deleted within three months after a child leaves the club, unless there is a documented reason to retain it for longer.
● Financial records will be retained for the period required by applicable tax and accounting rules.
● Safeguarding and accident records may need longer retention where there is a relevant concern, claim, investigation or legal requirement.
● Ordinary membership records will be kept only for the shortest practical period after a child leaves.

Records will be securely deleted or destroyed when the relevant retention period ends. 3

10. Individual rights and privacy requests

Individuals may have rights under data protection law, including the right to:

● Be informed about how their information is used.
● Request access to their personal information.
● Ask for inaccurate information to be corrected.
● Request deletion in circumstances where the law provides this right. ● Object to certain types of processing.
● Request restriction of processing in applicable circumstances.
● Withdraw consent where consent is the basis for processing.

Requests should be sent to:

Email: ana@khegaitaekwondo.com
Telephone: 01223 910776

The Club Owner will review requests and respond within the applicable legal timeframe. The club may need to verify the identity of the requester and, where someone is acting for a child, their authority to do so.

Deletion requests will be considered individually because some information may need to be retained for legal, insurance or safeguarding reasons.

11. Data breaches

A data breach may include personal information being lost, sent to the wrong person, accessed without permission or disclosed accidentally.

If a breach occurs, the Club Owner will:

1. Take reasonable steps to contain the breach and prevent further disclosure. 2. Establish what information has been affected and who may be at risk. 3. Record the incident and the action taken.
4. Assess whether the Information Commissioner's Office (ICO) or affected individuals must be notified.
5. Make any required notifications within the applicable legal time limits. 6. Review what happened and take steps to reduce the risk of it happening again.

12. Communication and online services

The club may communicate with parents by email and telephone.

If a parent WhatsApp group is used, joining will be optional and an alternative communication method will be available. Parents will be informed that other group members may be able to see their telephone number and profile information.

The club will explain the privacy implications before parents join a group. 4

Any online registration, payment or administration service introduced in future will be assessed before use. Health information will not be entered into an online service unless the club has checked that the service is suitable and appropriate safeguards are in place.

13. Photography and video records

Photographs and videos will be managed in accordance with the club's separate Photography and Filming Policy.

The club will keep a record of permissions and restrictions, and will not use a child's identifiable image for publicity where the required permission has not been given.

14. Review

This policy will be reviewed at least annually and whenever there is a significant change to the club's activities, storage arrangements or data protection responsibilities.

Approved by: Club Owner
Name: Anastasia Khegai
Signature: _____
Date: _____