

# Inspire Sports Privacy Policy



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## 1. POLICY STATEMENT

Inspire Learning Trust (which includes Oakwood High School, Sitwell Junior School, Winterhill School and Thomas Rotherham College and for the purposes of this policy is referred to as the Trust) is the data controller of the personal information you provide to us. This means they determine the purposes for which, and the manner in which, any personal data relating to staff is to be processed.

The Data Protection Officers for the Trust are as follows:

- Inspire Learning Trust; David Naisbitt, CEO: 01709 300600
- Oakwood High School: Chris Eccles, Headteacher: 01709 512222
- Sitwell Junior School: Jennifer Dawson, Headteacher: 01709 531867
- Thomas Rotherham College: Chris Walls, Assistant Principal: 01709 300600
- Winterhill School: Steve Rhodes, Principal & Deputy CEO: 01709 740232
- Inspire Sports: Daniel Wilson, Trust Community Sports Manager 01709 300700

The Trust also uses the services of an external DPO and this is Mr Tim Pinto.

Where necessary, third parties may be responsible for processing personal information. Where this is required, the school places data protection requirements on third party processors to ensure data is processed in line the customers privacy rights.

## **2. Why do we need your information?**

The Trust has the legal right and a legitimate interest to collect and process personal data relating to those that use our facilities. We process personal data for you to make a booking, membership, course enrolment, meet the safeguarding requirements set out in UK and childcare law, including those in relation to the following:

- Academy Funding Agreement
- Academy's legal framework
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2018

Personal data is also processed to assist in the running of Inspire Sports facilities (and Trust schools/colleges), and to enable individuals to pay for the use of our facilities; including information required by School hire our facilities booking site, RBS Bankline our standing order payment system, iZettle (our point-of-sale system) and our in-house databases.

## **3. Failure to provide personal data**

The Trust does not need to secure your consent to the collection of your personal data as there is a legitimate need for collection. However, the Trust has a duty to inform you of what data is retained, for how long and, wherever possible, to provide you secure access to your own data. You can decline to provide your data; however, this could lead to cancellation of booking or membership. This includes the following:

- All clubs U18s should have a safeguarding or welfare officer and supply us with this person's details and contact information. Failure to do so will lead to your booking being cancelled.
- We require parental consent in person with ID for anyone under 18 using the gym at Thomas Rotherham College, failure to provide this information will prevent you from using the gym facilities.
- Failure to provide booking information and payment prior to the session will prevent your booking from going ahead.

For which purposes are your personal data processed?

- Entry onto our booking system.
- To secure your booking.
- To secure a membership.
- Medical conditions to support should this be required.
- Disability details to support should this be required.
- Next of kin information, for emergency contact details.
- Reporting to the Local Safeguarding team.
- Contact you in relation to your booking or membership.

Personal data is held in the following systems which have been confirmed as compliant with the General Data Protection Regulations:

- School hire booking system website.
- Microsoft Office.
- Google suite.
- Paxton access control system.
- CCTV is in operation on each site and is hosted internally.
- The Football Association (The FA).
- iZettle.

#### **4. Which data is collected?**

The personal data Inspire Sports will collect includes the following:

- Name, date of birth, address, email address, personal phone numbers, next of kin information, photo ID.
- Characteristics; such as ethnic group and gender.
- Medical information, notes and reports.
- For gym membership, via standing order, possibly your bank account information

The collection of personal information will benefit both the Trust and Inspire Sports and other statutory bodies by:

- Improving the leisure industry data across the sector.
- Allow Inspire Sports to keep you in touch with the most relevant information in regards to that facility.
- Allowing better financial modelling and planning.
- Enabling ethnicity and disability monitoring.

#### **5. Will your personal data be sought from third parties?**

Personal data is primarily sought from the data subject (lead contact or gym member). No third parties will be contacted to obtain personal data without the data subject's consent.

Personal Data may be obtained and processed directly from third parties if the client has a medical issue and requires consent to exercise as a gym member from a GP

The Trust reserves the right to receive and review personal data from social websites or third parties where this indicates that the person is involved in acts which are deemed contrary to the Inspire Sports facilities and customers.

#### **6. How is your information shared?**

The Trust will not share your personal information with any third parties without your consent, unless the law allows us to do so. We are required, by law or regulation, to

pass on some personal information upon request from the Police, the Local Authority (including the Local Safeguarding Board),

This includes the following:

- CCTV footage in relation to incidents that could jeopardise safety and security of the sites or security of users.
- Police or other statutory enquiries.

**Personal Communications and Data Sharing between customers** often choose to share their personal data with their friends, this is a matter of personal choice and is outside the remit of the UK-GDPR regulations.

## **7. How long is your data retained for?**

Personal data is retained in line with the Trust's Information Asset Register which is available on each school or college's website. Data will only be retained for as long as is necessary to fulfil the purposes for which it was processed and will not be retained indefinitely.

## **8. Privacy notice – how the Trust uses personal information.**

The categories of personal information that we process include the following:

- Personal information e.g. name, contact details, emergency contact details, injuries and illnesses.
- Characteristics information e.g. gender, age, ethnicity.
- Booking requirements e.g. when, where and how you have used our facility.

This list is not exhaustive – to access the current list of information the school/college processes, please see the Trust's Information Asset Register which is available on each school/college's website.

Whilst most of the information you provide us is mandatory, some of it is requested on a voluntary basis. To comply with the UK GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice, and this is indicated as per the required sections for the online memberships or booking systems on school hire and supporting equality questionnaires.

Where the processing of your data is based on your explicit consent, you have the right to withdraw this consent at any time. This will not affect any personal data that has been processed prior to withdrawing consent.

If you have a concern about the way the Trust is processing or storing your data, in the first instance you need to report this to the Data Protection Officer Inspire Sports (see above). Should you not be satisfied with the outcome you can contact our external Data Protection Officer Mr T Pinto via Oakwood High School. Employees

also have the right to lodge a complaint with the Information Commissioner's Office (ICO) via their website at <https://ico.org.uk>

## 9. How can you find out more information?

If you require further information about how we and/or the DfE store and use your personal data, please contact:

- Chris Eccles, Oakwood High School
- Jennifer Dawson, Sitwell Junior School
- Joel Wirth, Thomas Rotherham College.
- Steve Rhodes, Winterhill School
- Other sources of information include: ICO website at <https://ico.org.uk>

Declaration: By agreeing to this policy, I declare that I understand:

- Inspire Learning Trust has a legal and legitimate interest to collect and process my personal data in order to meet statutory and contractual requirements.
- There may be significant consequences if I fail to provide the personal data Inspire Learning Trust requires.
- Inspire Learning Trust may share my data with statutory bodies, as outlined above.
- That my personal data is secured in the systems, as outlined above
- Inspire Learning Trust will not share my data to any other third parties without my consent unless the law requires the school/college/Trust to do so.
- The nature and personal categories of this data, and where the personal data originates from, where my data is obtained from third parties.
- My data is retained in line with Inspire Learning Trust's Information Asset Register.
- My rights to the processing of my personal data.
- This policy sets out how we will use your personal data, and your rights. It is made with reference to the General Data Protection Regulation (GDPR).

<b>Policy Review Frequency</b>	Annual
<b>Policy to be approved by</b>	
<b>Date of Review</b>	December 2023
<b>Approved by Chair</b>	
<b>Next Review</b>	December 2024
<b>Lead Professional / External Review</b>	Daniel Wilson
<b>Communication</b>	Website
<b>Document Location</b>	Every Compliance System, Document Library
<b>PA/HR Officer</b>	Leah Carr