Data Protection Policy 2026-27

Challenge Sport and Education Ltd, company number 08332038, is the data controller for the personal information described in this policy.

1. Scope and the law

This policy explains how we collect, use, store and share personal information about children, parents and carers, staff, freelancers and volunteers. It applies to everyone who works for or on behalf of Challenge Sport and Education. We follow the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We handle personal information in line with the data protection principles. It must be:

1. used lawfully, fairly and transparently
2. collected for clear, specific purposes
3. limited to what we need
4. accurate and kept up to date
5. kept no longer than necessary
6. kept secure

Doug Berlin, as owner, is responsible for data protection. We are registered with the Information Commissioner's Office (ICO) and renew our registration every year.

2. The information we hold and why

Whose	What	Why (lawful basis)
Children	Name, date of birth, school, medical needs, allergies, SEND, emergency contacts, authorised collectors, photo consent, registers, accident records	To deliver sessions and keep children safe (contract; legal obligation; vital interests). Health and SEND information is special category data, used to protect the child's health and safety
Parents and carers	Names, contact details, booking and payment records	To manage bookings and contact families (contract)
Safeguarding records	Concerns, referrals, allegations records	To protect children (legal obligation; substantial public interest in safeguarding children)
Staff, freelancers and volunteers	Contact details, application, references, ID and right to work, DBS certificate number and date, training, contracts, pay	To recruit safely and employ people (contract; legal obligation)
Photos and video	Images of children	Marketing and sharing activities, only with parental consent (consent)

Bookings, registers and accident records for our own courses are held on **Pebble**, our booking platform. Pebble processes this data on our behalf under a data processing agreement. We only use providers who keep data secure and in line with UK GDPR.

3. Keeping information safe

- Only staff who need information for their role can see it.
- Paper registers, medical details and incident books are kept with the session lead during sessions, then returned and stored in a locked cabinet or shredded.

- Digital records are kept on password-protected systems. Personal devices are never used to store children's information or images.
- Safeguarding and allegation records are kept separately and can only be accessed by the DSL (and the Deputy when acting as DSL).
- We do not keep copies of DBS certificates. We record the certificate number, issue date and outcome on the single central record.

4. Sharing information to keep children safe

Data protection law never prevents us from sharing information to keep a child safe. The DSL shares information with children's social care, the police, the LADO, Ofsted and schools where it is needed to protect a child, recording what was shared, with whom and why. Where possible and safe, we tell parents first.

5. Individuals' rights

Parents, staff and others can ask for a copy of the information we hold about them (a subject access request), and ask us to correct or delete it. We respond within one month. Some information, such as safeguarding records, may be withheld where sharing it could put a child at risk. Requests go to Doug Berlin via info@challengesporteducation.co.uk.

6. Data breaches

If personal information is lost, sent to the wrong person or accessed without permission, tell Doug Berlin immediately. We will contain the breach, assess the risk and, where there is a risk to people's rights, report it to the ICO within 72 hours and tell those affected.

7. How long we keep information

Record	How long we keep it
Bookings and registers	3 years after the child's last session
Accident, incident and medicine records	Until the child is 21
Safeguarding records about a child	Until the child is 25
Allegations against staff (substantiated, unsubstantiated, unfounded)	Until the person's normal retirement age, or 10 years, whichever is longer
Low-level concerns	Until the person leaves
Staff, freelancer and volunteer files, including the single central record	6 years after they leave
Right-to-work check copies (dated copy of passport or share code result), kept in a restricted folder separate from other staff records	For as long as the person works with us, plus 2 years, then deleted securely
Unsuccessful job applications	6 months after the decision
Complaints records	At least 3 years
Financial and payment records	6 years
Photos and video	Until consent is withdrawn, or 3 years after the child's last session

Records are destroyed securely (shredded or permanently deleted) at the end of the period.

8. Review

Our privacy notice for parents and staff is published on our website and explains this policy in plain language. This policy is reviewed every August.

Approved by: Doug Berlin, owner

Signed:

Doug Berlin

Date: 30.10.26