

The Royal School Learn to Swim Centre

GDPR Statement, Policy and T&C

1. The Royal School LTS Centre – About Us

The Royal School Learn to swim programme (LTS) is a registered Swim School and is part of The Royal School, Wolverhampton WV3 0EG.

2. The Royal School LTS Centre – GDPR Statement

In May 2018, the EU General Data Protection Regulation (GDPR) replaces the existing 1995 EU Data Protection Directive (European Directive 95/46/EC).

LTS currently complies with applicable data protection regulations and is committed to GDPR compliance across its relevant services when the GDPR takes effect May 25, 2018. LTS are dedicated to ensure we are compliant in all areas.

LTS has reviewed all areas of work relating to GDPR and have updated policies, standards, documents, governance and undergone training with staff, ensuring all staff are aware of GDPR and what they are required to do.

At LTS, we are working hard to serve customers a little better every day. Looking after the personal data you share with us is a hugely important part of this. We want you to be confident that you know your data is safe.

LTS work with a third-party company called CoursePro (Cap2). CoursePro have updated their system to ensure they comply with GDPR regulations. Customers will have to opt in to marketing – LTS have sent out an email to all customers asking them to reply, stating preferences. LTS have updated their enquiry form to include opt in marketing preferences. LTS will also send service emails to all registered customers of LTS, this is separate to marketing emails, and will contain information on actual lessons such as cancellations.

All personal data outside CoursePro will be destroyed and not kept as hard copies or electronic copies.

Compliance with the GDPR requires a partnership between LTS and our customers in their use of applicable LTS services. In this context, LTS generally will act as a data processor and our customers generally will act as data controllers. LTS encourages customers to independently familiarize themselves with the GDPR.

3. Data Protection and Privacy Policy and Procedure

This policy has been written to ensure clear guidance is given around personal data and how LTS uses this.

Data Collection and Storage – Purposes

LTS will hold the details of customers that is provided by customers within our secure third party system 'CoursePro'. This will also include class history and progress notes of each swimmer. More details on the system can be seen at the end of this document. 'CoursePro' will hold information it holds or obtains from or about you and will use this for the following purposes:

Standard

- For maintaining up to date records
- To create an individual profile for you so that we can understand and respect your preferences
- For service contact methods such as such as emails / SMS / post

- emails / SMS will be sent from 'CoursePro'
- to send you the LTS information booklet when you join or make an enquiry
- to respond to any enquiries, you make
- to administer any events in which you participate or may wish to participate and to deal with any incidents involving you
- to administer contact with you about closures of pools and cancelled lessons

Opt in options

- For marketing – this is an opt in option – emails sent from Its Team
- to contact you about new lessons, events, offers and opportunities available from LTS and the Royal
- School by post, email, online or phone (where you have indicated you are happy to hear about these)

Customer Photos and Video – Usage

LTS may record the lessons and events in which you / your child participate in and general images of swimmers will form part of the information we hold and use. In addition to the purposes for general information set out above, LTS may use these recordings and images for the purposes of education and training, swimmer analysis, promotion, performance, development and event analysis. Please complete the CONSENT FORM to photography at the Reception Office or you can request a copy via the email.

Customer Data – Medical Conditions

Customers have provided this information via the enrolment form or to LTS directly. This information is stored on our secure system 'CoursePro' and teachers will access this electronically for registers at each lesson. We hold these details to ensure the swimmer is safe during lessons and any adaptations to the lesson are made to ensure the swimmer is safe and can fulfil their potential. Any medical issues are always risk assessed and adaptations made to the lesson, if required.

Marketing – Images, Videos or Names

Should LTS wish to publish an article, social media blog, picture or video of you or your child, LTS will only do this when CONSENT has been given.

Customer Rights – Opt outs

All LTS Customers have the right to refuse direct marketing and can do so by ticking the relevant box(es) on the enquiry form and email sent from the team, which is available through contacting LTS. This can also be requested to change at any time and details of opt in and opt out preferences are stored on CoursePro. Please note this is separate to service emails, such as cancelled lessons from CoursePro.

Customer Rights – Data Handling

You are entitled to a copy of your personal data from LTS. You are also entitled to amend any of your personal data at any time (by contacting the LTS administration team), such as, address changes, medical changes or incorrect information stored.

Customer Data – Deletion of Data

All customers have the right to have data deleted, this will predominately be requested and occur when a swimmer leaves the LTS scheme. Customers can leave the scheme and request all data to be deleted and at this time LTS will comply by this. If a customer does not request the data to be deleted, then LTS will delete data before or up to 12 months of last lesson with LTS, should customers not request this prior to this or get in contact to advise they would like data stored.

Website – Cookies

LTS uses cookies on our website www.theroyalswimming.co.uk the “Service”. When you enter the page you will be asked to accept the cookie box that appears. By using the Service, you consent to the use of cookies. This box will be shown at the bottom of the page.

Summery

What information is being collected on individuals:

LTS will ask for the following data when a member joins up to swimming lessons at LTS:

- Name
- DOB
- Address
- Email address 1 and 2
- Phone number 1 and 2
- Parent details
- Medical Declaration and details
- Previous swimming history
- Where they heard from us
- School the child attends
- Past swimming history – latest badges etc.
- LTS states on form that data will be held 12months from when a person leaves the scheme
- Whether they opt into or out of:
 - LTS sending details of products, competitions, promotions and services
 - LTS sending details of events
 - LTS to send normal communications
- Photography of participant – for marketing purposes, notice board, newsletters and website

LTS will hold the above information on CoursePro our secure system and the additional data will be added:

- Changes to any of the above – parents need to email or call the LTS admin staff to make amendments
- Class history
- New and current and past bookings
- New and current and past award progress
- New and current and past outcome progress

LTS will also hold data on our staff and all documents are password protected on our computers and also in the cloud. LTS management are the only ones (and the individual staff) that can access this data.

LTS may have historic documents or documents not on CoursePro that hold data on individuals these documents are all password protected and only accessed by LTS admin staff.

If a members wants to be deleted, this can be done on CoursePro and will be done meaning they are deleted from the system and all historic and present data deleted, this will also mean they are deleted off any current classes or future classes.

How will data be used

LTS will collect new joiner data through an enquiry form via the LTS admin team. This may be done verbally or be emailed and the client emails this back or hands this in. The details are entered onto the CoursePro system and the form is destroyed, no electronic forms are held.

LTS admin staff are the only people within LTS that have access to member private details. Teachers can access CoursePro though a teacher log in and the only thing that is displayed is the register for each class which shows Childs name, contact number and medical details. These cannot be amended but can be viewed.

Teachers have access to making amendments on a child's progress by ticking outcomes, this can be viewed by the parent on the Home Portal of CoursePro.

The data we hold on each individual will enable LTS to run proficient classes with similar ability children, be safe with knowledge of medical records, have contact details for emergency and for if a class is cancelled. Have clear opt in and opt out data on what we send individuals from LTS.

Who is the data shared with

- LTS Admin Staff
- LTS Teachers (limited view)
- CoursePro
- Barclays Bank – for BACS transfers for fees or for refunds – this is only names, sortcode and account number
- Marketing – only if an individual asks us to market something on them or we have gained consent to use a child's photo and name for marketing
- The Royal School – this is only relevant to those who are students at The Royal School. This is solely names to check pupil's ability when start of school year assessments are done.

What will the effect of this be on the individuals concerned and Is the intended likely to cause individuals to object or complain

The effect this data we hold has on the individual is that they can be rest assured from LTS it is safe within CoursePro. Data and details are used to ensure a child is safe, parents can be contacted, progression can be tracked by LTS and parent and medical declarations can be assessed and lessons adjusted if required.

No data is ever passed onto 3rd party marketing companies.