



CM Sports – GDPR (Data Protection) Policy	
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1. Policy Statement

CM Sports is committed to protecting the personal information of children, families, staff, volunteers and other individuals.

CM Sports will comply with the **UK General Data Protection Regulation (UK GDPR)**, **Data Protection Act 2018**, applicable provisions of the **Data (Use and Access) Act 2025**, and relevant guidance from the Information Commissioner's Office (ICO).

When working with children, data protection will always be considered alongside safeguarding responsibilities.

2. Personal Data

Personal data is information relating to an identified or identifiable individual.

This may include:

- Names and contact details.
- Emergency contact information.
- Children's registration and attendance information.
- Medical, dietary and additional needs information.
- Safeguarding information.
- Staff employment and payroll information.
- Photographs, videos and other images.
- Information provided through email, telephone, messaging or other communication.

Some information, including health and safeguarding information, is subject to additional protection.

3. Data Protection Principles

CM Sports will ensure that personal information is:

- Processed lawfully, fairly and transparently.
- Collected for clear and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Kept only for as long as necessary.
- Stored and processed securely.
- Protected against unauthorised access, loss, destruction or disclosure.
- Managed in a way that allows CM Sports to demonstrate compliance.

CM Sports will apply **data protection by design and by default**, particularly when processing children's information. The ICO emphasises the importance of appropriate access controls and a cautious, proportionate approach to sharing children's information.

4. Lawful Processing

CM Sports will only collect and process personal information where there is a lawful basis for doing so.

Depending on the circumstances, this may include:

- Consent.
- Contract.
- Legal obligation.

- Legitimate interests.
- Vital interests.
- Other lawful bases permitted by data protection legislation.

Consent is not required for every type of information processing. Where CM Sports has a legal obligation or another appropriate lawful basis, information may be collected, used or shared without consent.

5. Safeguarding and Information Sharing

Protecting children takes priority.

CM Sports staff must understand that data protection legislation **does not prevent appropriate information sharing to safeguard children.**

Information may be shared without consent where there is a lawful basis and sharing is necessary and proportionate to protect a child or another person from harm.

Staff must not allow uncertainty about data protection to prevent them from reporting or sharing information where there is a safeguarding concern.

Where appropriate, information may be shared with:

- Children's Social Care.
- Police.
- Safeguarding partners.
- The child's school or setting.
- Health professionals.
- Other relevant agencies or professionals.

Only information that is **relevant, necessary and proportionate** should normally be shared.

The best interests and safety of the child must be considered when deciding whether children's personal information should be shared.

All safeguarding concerns must be reported in accordance with the **Safeguarding and Child Protection Policy.**

6. Confidentiality

Staff must maintain confidentiality and must not discuss personal or safeguarding information with anyone who does not have a legitimate reason to receive it.

Confidential information must not be:

- Discussed in public areas.
- Shared through personal social media.
- Sent to unauthorised individuals.
- Left visible or accessible to others.
- Stored on unauthorised devices or accounts.

Confidentiality must not, however, prevent appropriate safeguarding action.

7. Children's Information

CM Sports recognises that children's personal information requires particular care.

Access to children's information will be restricted to staff who need it to perform their role.

CM Sports will take particular care when handling:

- Medical information.
- SEND and additional needs information.
- Safeguarding information.
- Emergency contact details.
- Photographs and videos.
- Information about a child's family circumstances.

8. Individual Rights

Individuals have rights under data protection legislation, including, where applicable:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights relating to automated decision-making and profiling.

These rights are subject to certain legal exemptions and limitations.

Requests concerning personal information should be referred to the **CM Sports Directors**.

9. Privacy Information

CM Sports will provide appropriate privacy information explaining:

- What information is collected.
- Why it is collected.
- The lawful basis for processing.
- How information is used.
- Who information may be shared with.
- How long information is retained.
- Individual rights.
- How to raise a concern.

Privacy information will be written in clear and accessible language.

10. Photographs, Videos and Images

Photographs and videos involving children must be taken, stored and used in accordance with CM Sports procedures and any relevant parental permissions.

Staff must not use personal devices to photograph or record children unless specifically authorised under CM Sports procedures.

Images must not be shared on personal social media accounts or with unauthorised individuals.

Further requirements are set out in the **Mobile Phones, Photography and Electronic Devices Policy**.

11. Storage and Security

CM Sports will take reasonable technical and organisational measures to keep information secure.

This includes:

- Keeping paper records in secure storage.
- Using appropriate passwords and access controls.
- Restricting access to information on a need-to-know basis.
- Keeping laptops and electronic devices secure.
- Not leaving work devices unattended in vehicles overnight.
- Using secure methods when transferring confidential information.
- Securely disposing of information when it is no longer required.

12. Data Breaches

A data breach may include:

- Information being sent to the wrong person.
- Loss or theft of a device containing personal information.
- Unauthorised access to records.
- Accidental disclosure of confidential information.
- Loss, destruction or alteration of personal information.

Any suspected or actual data breach must be reported to the **CM Sports Directors immediately**.

Management will assess the breach and determine whether notification to the ICO or affected individuals is required.

Where a reportable breach is likely to result in a risk to individuals' rights and freedoms, the ICO must generally be notified without undue delay and, where feasible, within **72 hours** of becoming aware of it.

13. Retention and Disposal

CM Sports will not keep personal information for longer than is necessary for the purpose for which it was collected, unless there is a legal or regulatory reason to retain it.

Retention periods will depend on the type of information and applicable legal requirements.

Information that is no longer required will be securely destroyed or deleted.

14. Staff Responsibilities

All staff, coaches and volunteers must:

- Complete relevant data protection training.
- Keep personal information secure.
- Follow CM Sports confidentiality procedures.
- Only access information required for their role.
- Report safeguarding concerns immediately.
- Report data breaches immediately.
- Not share confidential information without appropriate authority or lawful justification.
- Follow CM Sports procedures when using electronic devices, photographs or messaging systems.

15. Data Protection Lead

The **CM Sports Directors** are responsible for overseeing data protection arrangements.

They will:

- Monitor compliance.
- Review policies and procedures.
- Respond to data protection concerns and requests.
- Manage data breaches.
- Ensure appropriate training is provided.
- Liaise with the ICO where required.

Where CM Sports is legally required to appoint a Data Protection Officer, the organisation will make the appropriate arrangements.

16. Complaints

Any concerns about the collection, storage, use or sharing of personal information should initially be raised with the CM Sports Directors.

Complaints will be investigated in accordance with the **Complaints Policy**.

Individuals also have the right to complain directly to the **Information Commissioner's Office (ICO)** where they believe their personal information has not been handled appropriately.

17. Safeguarding Link

CM Sports recognises that effective information sharing is an essential part of safeguarding.

Staff must never use confidentiality or data protection as a reason for failing to report a safeguarding concern.

The ICO confirms that consent is not always required to share a child's information for safeguarding purposes and that UK data protection law provides a framework for lawful and proportionate safeguarding information sharing.

This policy should therefore always be read alongside the **Safeguarding and Child Protection Policy**.