



Data Protection and GDPR Policy

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Approved by (name and title):	Matthew Lee Director
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Data Protection and GDPR Policy

1. Introduction

At Limitless Sports and Activities Ltd ('**Limitless**') we are committed to protecting the personal data of children, parents, staff, and visitors. We understand the importance of privacy and take our responsibilities under data protection laws seriously. This policy outlines how we collect, use, store, and protect personal data in line with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), The Children Act 1989 and 2004, Children's safeguarding legislation (KCSIE, Working Together 2023) and guidelines from Ofsted. It also aligns with the safeguarding expectations set by the Local Authorities.

2. Scope of the Policy

This policy applies to all employees, contractors, tutors, mentors and volunteers working on behalf of Limitless ('**staff**')

This policy applies to all personal data processed by Limitless including:

- Personal information of children (e.g. names, addresses, school attended, date of birth, medical details, SEND/SEMH information, emergency contacts, dietary requirements).
- Parent or guardian details (e.g., names, contact information, payment records).
- Staff and contractor information (e.g., names, addresses, contact details, emergency contact details, employment details, qualifications, DBS checks)
- Information shared with external parties (e.g., Cambridgeshire and Suffolk Child Services, emergency services).
- Information shared with Schools and commissioning bodies
- visitors and third-party professional information

It applies to all data processed in relation to:

- All services delivered by Limitless
- Safeguarding and welfare
- Attendance, behaviour, and where applicable, progress
- Recruitment and workforce management
- Health, medical, SEND, and SEMH information
- CCTV or photography (where applicable)

It applies to all data that Limitless holds relating to identifiable individuals, even if that information technical falls outside of the Data Protection Act or GDPR.

3. The Role of the Data Protection Officer

Limitless Data Protection Officer (Matthew Lee) **supports the lawful, safe and accountable use of children's personal data.** The Data Protection officer advises Management and staff to ensure:

- All personal data is processed lawfully, fairly, and in a transparent manner.
- Data is collected for specified, legitimate purposes and not further processed in ways incompatible with those purposes.
- Only relevant and necessary data is collected and processed.



Data Protection and GDPR Policy

- Personal data is accurate and kept up to date.
- Personal data is stored securely and only retained for as long as necessary.
- Data subjects (including children and parents) are informed about how their data is handled and can exercise their rights under the UK GDPR.

The Data Protection office will also monitor Compliance and inform of any necessary updates to this policy in accordance with UK GDPR.

4. Lawful Basis for Processing

We process personal data under the following lawful bases:

- **Consent:** Parents and guardians provide explicit consent when enrolling their child in the camp and providing personal data.
- **Contractual obligations:** We process data necessary to fulfil the terms of the service agreement with parents and staff.
- **Legal obligation:** Some data processing is required to meet legal obligations, including safeguarding and health and safety requirements, as outlined by Ofsted and Local Authorities.
- **Vital interests:** In situations involving medical emergencies, we may process personal data without explicit consent if necessary to protect a child's vital interests.
- **Legitimate interests:** Personal data may also be processed when it is in the legitimate interest of the Organisation, provided it does not override the rights of the data subject.

5. Data Sharing

We may share personal data with third parties only when necessary, and this will always be done in compliance with the UK GDPR. Examples include:

- **Emergency services:** In case of medical or other emergencies.
- **Local Authority Child Services:** If safeguarding concerns arise or statutory reporting is required.
- **Ofsted:** In the context of inspections and compliance monitoring.
- **Contractors:** Such as specialist activity providers, where necessary and with prior parental consent.

We ensure that third-party providers processing data on our behalf have appropriate data protection measures in place.

6. Data Security

We take data security seriously and employ various measures to protect personal data:

- **Physical security:** Any paper records (e.g., registration forms, medical records) are stored in locked cabinets accessible only by authorised staff. Any paper records containing personal information required during the course of the service (e.g. at the setting) are retained by authorised personnel and are not left where unauthorised people can see them.
- **Digital security:** Access to digital records is restricted to staff members who need the information to perform their role. Data is stored on an approved cloud service and is never saved directly to laptops or mobile phones.



Data Protection and GDPR Policy

- **Training:** All staff receive regular training on data protection principles, safeguarding, and their responsibilities under the UK GDPR.
- **Breach procedures:** In the unlikely event of a data breach, we have established procedures to notify affected individuals and the Information Commissioner's Office (ICO) within 72 hours, if required.

7. Data Retention

We retain personal data only for as long as it is necessary for the purposes it was collected, in line with legal requirements.

Once data is no longer needed, it is securely destroyed, whether by shredding physical documents or permanently deleting digital records.

Within Limitless Alternative Provision the following applies:

- For a non-safeguarding record data is retained for no longer than 3 years after the child has left (in alignment with education and early-years sector guidance)
- For accident, incident and behaviour records these will be held until the child reaches the age of 21.
- For safeguarding records: All original safeguarding documents will be provided to the designated DSL at the Child's school. The **Chronology of Events record** will be retained until the child reaches 25.

8. Parent, Guardian and Children's Rights

Under the UK GDPR, parents, guardians, and children (if applicable) have the following rights:

- **Right to access:** Parents or guardians have the right to request access to personal data held about them or their children.
- **Right to rectification:** If any personal data is inaccurate, parents or guardians can request it be corrected.
- **Right to erasure:** In certain situations, parents or guardians can request that personal data be deleted (though this may be limited if the Organisation has a legal obligation to retain the data).
- **Right to restrict processing:** Parents may request that we limit the use of personal data in specific situations.
- **Right to data portability:** Personal data can be requested in a machine-readable format to be shared with another provider.
- **Right to object:** Parents can object to data processing that is not required by law or contractual obligation.

Requests for exercising any of these rights can be made in writing to the Director (Matthew Lee), who will respond within 30 days.

9. Parental Consent

Consent for collecting and processing children's data is obtained during the registration process. This includes:

- Medical information for care and emergencies.
- Emergency contacts.



Data Protection and GDPR Policy

- Permissions for outings or special activities.
- Photography consent (if applicable).

Parents and guardians will also be informed of their right to withdraw consent at any time.

10. Data Breaches

In the event of a data breach:

1. Identification: The breach will be immediately reported to the Director (Matthew Lee).
2. Containment: Steps will be taken to minimise the damage and secure the data.
3. Notification: The Information Commissioner's Office (ICO) will be notified if the breach poses a risk to individual rights and freedoms. Affected individuals will also be informed if the breach could cause harm.
4. Review: A full investigation will be conducted to prevent future breaches.

11. Confidentiality and Safeguarding

All staff are trained in safeguarding, including confidentiality protocols. When safeguarding concerns arise, relevant personal data may be shared with external authorities e.g. Child Services. Such sharing is done in line with legal and safeguarding responsibilities, ensuring that children are protected and that their personal information is handled appropriately.

12. Contact Information for Data Concerns

Parents, guardians, or staff members who have concerns regarding data protection, or who wish to exercise their rights, should contact:

Matthew Lee
Director, Limitless Sports & Activities Limited
Info@limitlessactivities.co.uk
07956 674890

Complaints can also be made to the Information Commissioner's Office (ICO) if individuals feel their data is not being handled in accordance with the law.

13. Monitoring and Review

This Data Protection and Privacy Policy will be reviewed annually or sooner if there are changes to data protection laws, Ofsted guidelines, or internal practices.