

MACCA

Sports Academies

'Using sport as a foundation to develop great people'

The UK General Data Protection Regulation (UK GDPR)

1. Introduction

1.1. MACCA Sports Academies collects and uses certain types of personal information about staff, children, parents and other individuals who access our settings in order to provide our services and associated functions. The Setting may be required by law to collect and use certain types of information to comply with statutory obligations related to employment, our services and safeguarding, and this policy is intended to ensure that personal information is dealt with properly and securely and in accordance with the General Data Protection Regulation and other related legislation.

1.2. The UK GDPR applies to all computerised data and manual files if they come within the definition of a filing system. Broadly speaking, a filing system is one where the data is structured in some way that it is searchable on the basis of specific criteria (so you would be able to use something like the individual's name to find their information), and if this is the case, it does not matter whether the information is located in a different physical location.

1.3. This policy will be updated as necessary to reflect best practice, or amendments made to data protection legislation, and shall be reviewed every two years.

1.4. This policy meets the requirements of the UK GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the UK GDPR and the ICO's code of practice for subject access requests. It reflects the ICO's code of practice for the use of surveillance cameras and personal information.

1.5. It also reflects the ICOs code of practice for the use of surveillance cameras and personal information

2. Definition Table

Term	Definition
Personal Data	<p>'Personal data' is information that identifies an individual, and includes information that would identify an individual to the person to whom it is disclosed because of any special knowledge that they have or can obtain¹. This may include</p> <ul style="list-style-type: none">• Name (including initials)• Identification Number• Location Data (Address)• Online Identifier (Username) <p>It may also include factors specific to individuals physiological, genetic, mental, economic, cultural or social identity.</p>

Term	Definition
Special Category (Sensitive Data)	<p>A sub-set of personal data is known as 'special category personal data'. This special category data is information that relates to:</p> <ul style="list-style-type: none"> • race or ethnic origin; • political opinions; • religious or philosophical beliefs; • trade union membership; • physical or mental health; • an individual's sex life or sexual orientation; • genetic or biometric data for the purpose of uniquely identifying a natural person. <p>Special Category information is given special protection, and additional safeguards apply if this information is to be collected and used.</p>
Data Subject	The identifiable individual whose personal data is processed or held
Data controller	The organisation that determines the purpose and the means of processing of personal data
Data processor	A person or organisation who processes personal data on behalf of the data controller (not including the data controller or an employee)
Processing	Anything done to personal data, such as collecting, organising, storing, altering, using, erasing or destroying. Processing data can be a manual or automated process
Data Protection Officer (DPO)	The Data Protection Officer is responsible for auditing the protection of data in MACCA Sports Academies, liaising with the ICO and responding to requests

3. The Data Controller

3.1. MACCA Sports Academies processes personal data relating to parents, children, staff, visitors and others and therefore is the data controller

3.2. MACCA Sports Academies is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required

4. Roles and Responsibilities

4.1. This policy applies to all staff employed by MACCA Sports Academies, including any external organisations or individuals working on behalf of MACCA Sports Academies. Staff who do not comply with this policy may face disciplinary action.

4.2. The Director has overall responsibility for ensuring that MACCA Sports Academies complies with all relevant data protection obligations.

4.3. Data Protection Officer

4.4.1. The Data Protection Officer (DPO) is responsible for overseeing the implementation of this policy, monitoring compliance with the data protection law, and developing related policies and guidelines where applicable

4.4.2. The DPO is the first point of contact for individuals and organisations whose data MACCA Sports Academies processes and for the ICO

4.4.3. The DPO will provide the Directing Board a report where relevant, reporting their advice, recommendations and any breaches.

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4.4.4. Our DPO is Matthew Albinson and is contactable via admin@maccasportsacademies.com

4.5. Staff are responsible for:

4.5.1. Collecting, storage, processing, publishing any personal data in accordance with this policy.

4.5.2. Informing the Head of HR of any changes to their living arrangements, personal data (I.e: New address, phone number, home e-mail, living status)

4.5.3. Contacting the DPO if they have any queries or questions regarding the use of and the protection of data across MACCA Sports Academies Ltd, including;

4.5.3.1. Concerns that the policy is not being followed

4.5.3.2. If they are unsure how to process a piece of personal data, including how they can store and transmit/receive data from external sources

4.5.3.3. If there has been a data breach

4.5.3.4. If they are unsure whether there is a lawful basis to collect and/or store information

4.5.3.5. If they need to apply a UK GDPR principle to processing data

5. The data protection principles

5.1. The UK GDPR is based on data protection principles that our settings must comply with:

5.1.1. personal data shall be processed fairly, lawfully and in a transparent manner, and processing shall not be lawful unless one of the processing conditions can be met

5.1.2. Personal data shall be collected for specific, explicit, and legitimate purposes, and shall not be further processed in a manner incompatible with those purposes

5.1.3. personal data shall be adequate, relevant, and limited to what is necessary for the purpose(s) for which it is being processed

5.1.4. personal data shall be accurate and, where necessary, kept up to date

5.1.5. personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose / those purposes

5.1.6. personal data shall be processed in such a way that ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

5.2. In addition to this, the Setting is committed to ensuring, that at all times, anyone dealing with personal data shall be mindful of the individual's rights under the law (as explained in more detail in paragraphs 7 and 8 below).

5.3. The Setting will comply with the principles at all times. This means that the setting will:

5.3.1. inform individuals as to the purpose of collecting any information from them, as and when we ask for it

5.3.2. be responsible for checking the quality and accuracy of the information

5.3.3. regularly review the records held to ensure that information is not held longer than is necessary, and that it has been held in accordance with the data retention policy

5.3.4. ensure that when information is authorised for disposal it is done appropriately

5.3.5. ensure appropriate security measures to safeguard personal information whether it is held in paper files or on our computer system, and follow the relevant security policy requirements at all times

5.3.6. share personal information with others only when it is necessary and legally appropriate to do so

5.3.7. set out clear procedures for responding to requests for access to personal information known as subject access requests

5.3.8. report any breaches of the UK GDPR in accordance with the procedure in paragraph 9 below

6. Collecting personal data

6.1. Lawfulness, fairness and transparency

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6.1.1. We will only process personal data where we have one of the 6 'lawful bases' (legal reasons) to do so under the data protection law:

6.1.1.1. The data needs to be processed so that MACCA Sports Academies Ltd can fulfil a contract with the individual, or the individual has asked MACCA Sports Academies Ltd to specify steps before entering into a contract

6.1.1.2. The data needs to be processed so that MACCA Sports Academies can comply with a legal obligation

6.1.1.3. The data needs to be processed to ensure the vital interests of the individual e.g. to protect someone's life

6.1.1.4. The data needs to be processed so that MACCA Sports Academies, as a public authority, can perform a task in the public interest, and carry out its official functions

6.1.1.5. The data needs to be processed for the legitimate interests of MACCA Sports Academies or a third party (provided the individual's rights and freedoms are not overridden)

6.1.1.6. The individual (or their/parent when appropriate in the case of a child) has freely given clear consent

6.1.2. For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the UK GDPR and Data Protection Act 2018

6.1.3. Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

6.2. Limitation, minimisation and accuracy

6.2.1. We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data

6.2.2. If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary

6.2.3. Staff must only process personal data where it is necessary in order to do their job

6.2.4. When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with MACCA Sports Academies Records Management Policy and Retention Schedule.

7. Use of personal data by the setting

7.1. The Setting holds personal data on children, staff and other individuals such as visitors. In each case, the personal data must be treated in accordance with the data protection principles as outlined in this policy.

Children

7.2. The personal data held regarding children includes contact details, attendance information, characteristics such as ethnic group, special educational needs, any relevant medical information, and photographs.

7.3. The data is used in order to support the provision and support of the children, and to assess how well the setting as a whole is doing, together with any other uses normally associated with the provision.

7.4. The Setting may make use of limited personal data (such as contact details) relating to children, and their parents or guardians for fundraising, marketing or promotional purposes and to maintain relationships with children of the setting.

7.5. In particular, the Setting may:

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7.5.1. transfer information to any association society or club set up for the purpose of maintaining contact with children or for fundraising, marketing or promotional purposes relating to the setting but only where consent has been obtained first.

7.5.2. make personal data, including sensitive personal data, available to staff for planning curricular or extra-curricular activities

7.5.3. Use photographs of children in accordance with the paragraph 20.

7.6. Any wish to limit or object to any use of personal data should be notified to the MACCA Sports Academies Data Protection Officer (DPO) in writing, which notice will be acknowledged by the Setting in writing. If, in the view of the DPO the objection cannot be maintained, the individual will be given written reasons why the Setting cannot comply with their request.

Staff

7.7. The personal data held about staff will include contact details, employment history, information relating to career progression, performance, information relating to DBS checks and photographs.

7.8. The data is used to comply with legal obligations placed on the Setting in relation to employment. The Setting may pass information to other regulatory authorities where appropriate and may use names and photographs of staff in publicity and promotional material. Personal data will also be used when giving references.

7.9. Staff should note that information about disciplinary action may be kept for longer than the duration of the sanction. Although treated as “spent” once the period of the sanction has expired, the details of the incident may need to be kept for a longer period.

7.10. Any wish to limit or object to the uses to which personal data is to be put should be notified to the MACCA Sports Academies Data Protection Officer (DPO) who will ensure that this is recorded and adhered to if appropriate. If the DPO is of the view that it is not appropriate to limit the use of personal data in the way specified, the individual will be given written reasons why the Setting cannot comply with their request.

Other Individuals

7.11. The Setting may hold personal information in relation to other individuals who have contact with the setting, such as volunteers and guests. Such information shall be held only in accordance with the data protection principles and shall not be kept longer than necessary.

8. Security of personal data

8.1. The Setting will take reasonable steps to ensure that members of staff will only have access to personal data where it is necessary for them to carry out their duties. All staff will be made aware of this Policy and their duties under the UK GDPR. MACCA Sports Academies will take all reasonable steps to ensure that all personal information is held securely and is not accessible to unauthorised persons.

8.2. For further details as regards security of IT systems, please refer to the IT Acceptable Use Policy.

9. Disclosure of personal data to third parties

9.1. The following list includes the most usual reasons that the Setting will authorise disclosure of personal data to a third party:

9.1.1. Where we have outlined in our privacy notices

9.1.2. Where there is an issue with a child or parent/carer that puts the safety of our staff or attending children at risk

9.1.3. To give a confidential reference relating to a current or former employee, volunteer or child

9.1.4. for the prevention or detection of crime

9.1.5. for the assessment of any tax or duty

9.1.6. Where it is necessary to exercise a right or obligation conferred or imposed by law upon the Setting (other than an obligation imposed by contract)

9.1.7. for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings)

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9.1.8. for the purpose of obtaining legal advice

9.1.9. for research, historical and statistical purposes (so long as this neither supports decisions in relation to individuals, nor causes substantial damage or distress)

9.1.10. to publish the results of public examinations or other achievements of children of the Setting

9.1.11. to disclose details of a child's medical condition where it is in the child's interests to do so, for example for medical advice, insurance purposes or to organisers of trips

9.1.12. to provide information to another educational establishment to which a child is on roll or transferring to

9.2. The DfE uses information about children for statistical purposes, to evaluate and develop education policy and to monitor the performance of the nation's education service as a whole. The statistics are used in such a way that individual children cannot be identified from them. On occasion the DfE may share the personal data with other Government Departments or agencies strictly for statistical or research purposes.

9.3. The Setting may also share personal data with emergency services and local authorities to help them respond in an emergency that affects any of our children, staff, volunteers or customers.

9.4. The Setting may receive requests from third parties (i.e. those other than the data subject, the Setting, and employees of the Setting) to disclose personal data it holds about children, their parents or guardians, staff or other individuals. This information will not generally be disclosed unless one of the specific exemptions under data protection legislation which allow disclosure applies; or where necessary for the legitimate interests of the individual concerned or the Setting.

9.5. All requests for the disclosure of personal data must be sent to the Data Protection Officer (DPO) who will review and decide whether to make the disclosure, ensuring that reasonable steps are taken to verify the identity of that third party before making any disclosure.

10. Confidentiality of child concerns

10.1. Where a child seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents or guardian, the Setting will maintain confidentiality unless it has reasonable grounds to believe that the child does not fully understand the consequences of withholding their consent, or where the Setting believes disclosure will be in the best interests of the child or other children.

10.2. The safety of the child within the setting is paramount. MACCA Sports Academie's Child Protection policy will always override any confidentiality concerns.

11. Subject Access Requests

11.1. Anybody who makes a request to see any personal information held about them by the Setting is making a subject access request. All information relating to the individual, including that held in electronic or manual files should be considered for disclosure, provided that they constitute a "filing system" (see clause 1.5).

11.2. All requests should be sent to the Data Protection Officer (DPO) within 3 working days of receipt and must be dealt with in full without delay within 1 month of receipt.

11.3. The Setting may tell the individual the request will be dealt with within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month and explain why the extension is necessary.

11.4. Subject access requests must be submitted in writing, either by letter, email or fax to the Data Protection Officer. There is a template available on MACCA Sports Academies website which includes:

11.4.1. Name of the individual

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11.4.2. Correspondence address

11.4.3. Contact Number and email address

11.4.4. Details of the information requested

11.5. If staff receive a subject access request, they must immediately forward the to the Data Protection Officer

11.6. Where a child or young person does not have sufficient understanding to make his or her own request (usually those under the age of 12, or over 12 but with a special educational need which makes understanding their information rights more difficult), a person with parental responsibility can make a request on their behalf. The DPO must, however, be satisfied that:

11.6.1. the child or young person lacks sufficient understanding; and

11.6.2. the request made on behalf of the child or young person is in their interests

11.7. Any individual, including a child or young person with ownership of their own information rights, may appoint another person to request access to their records. In such circumstances the Setting must have written evidence that the individual has authorised the person to make the application and the DPO must be confident of the identity of the individual making the request and of the authorisation of the individual to whom the request relates.

11.8. Access to records will be refused in instances where an exemption applies, for example, information sharing may place the individual at risk of significant harm or jeopardise police investigations into any alleged offence(s).

11.9. The Setting will provide the information free of charge, unless it is an unfounded or excessive request. If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which considers administrative costs. A request will be deemed to be unfounded or excessive if it is repetitive or asks for further copies of the same information.

11.10. The requester may be asked to provide 2 forms of identification to prove who they are and to allow the Setting to ensure they are eligible to access the information and to ensure information is not released to the wrong parties.

11.11. An individual only has the automatic right to access information about themselves, and care needs to be taken not to disclose the personal data of third parties where consent has not been given, or where seeking consent would not be reasonable, and it would not be appropriate to release the information. Particular care must be taken in the case of any complaint or dispute to ensure confidentiality is protected.

11.12. All files must be reviewed by the DPO before any disclosure takes place. Access will not be granted before this review has taken place.

11.13. Where all the data in a document or file cannot be disclosed a permanent copy should be made and the data obscured or retyped if this is more sensible. A copy of the full document and the altered document should be retained, with the reason why the document was altered.

12. Exemptions to access by data subjects

12.1. Where a claim to legal professional privilege could be maintained in legal proceedings, the information is likely to be exempt from disclosure unless the privilege is waived.

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12.2. There are other exemptions from the right of subject access. If we intend to apply any of them to a request, then we will usually explain which exemption is being applied and why.

12.3. The Setting will not disclose information if it:

12.3.1. Might cause serious harm to the physical or mental health of the individual or another individual

12.3.2. Would reveal that a child is at risk of abuse or where the disclosure of that information would not be in the child's best interests

12.3.3. Is detailed in the court orders

12.3.4. Is information where disclosure would result in revealing personal information about another child, staff member, volunteer or visitor

13. Other rights of individuals

13.1. The Setting has an obligation to comply with the rights of individuals under the law and takes these rights seriously. The following section sets out how the setting will comply with the rights to:

- 13.1.1.1. object to Processing;
- 13.1.1.2. rectification;
- 13.1.1.3. erasure; and
- 13.1.1.4. data Portability.

13.2. Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO

Right to object to processing

13.3. An individual has the right to object to the processing of their personal data on the grounds of pursuit of a public interest or legitimate interest (grounds 4.5 and 4.6 above) where they do not believe that those grounds are made out.

13.4. Where such an objection is made, it must be sent to the DPO within 2 working days of receipt, and the DPO will assess whether there are compelling legitimate grounds to continue processing which override the interests, rights and freedoms of the individuals, or whether the information is required for the establishment, exercise or defence of legal proceedings.

13.5. The DPO shall be responsible for notifying the individual of the outcome of their assessment within 30 working days of receipt of the objection.

Right to rectification

13.6. An individual has the right to request the rectification of inaccurate data without undue delay. Where any request for rectification is received, and where adequate proof of inaccuracy is given, the data shall be amended as soon as reasonably practicable, and the individual notified.

13.7. Where there is a dispute as to the accuracy of the data, the DPO should be notified within 2 days of receipt. The request and reasons for refusal shall be noted alongside the data and communicated to the individual by the Data Protection Officer (DPO). The individual shall be given the option of a review under the complaint's procedure, or an appeal direct to the Information Commissioner.

13.8. An individual also has a right to have incomplete information completed by providing the missing data, and any information submitted in this way shall be updated without undue delay.

Right to erasure

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13.9. Individuals have a right, in certain circumstances, to have data permanently erased without undue delay. This right arises in the following circumstances:

- 13.9.1. where the personal data is no longer necessary for the purpose or purposes for which it was collected and processed
- 13.9.2. where consent is withdrawn and there is no other legal basis for the processing
- 13.9.3. where an objection has been raised under the right to object, and found to be legitimate
- 13.9.4. where personal data is being unlawfully processed (usually where one of the conditions for processing cannot be met)
- 13.9.5. where there is a legal obligation on the Setting to delete.

13.10. The DPO will make a decision regarding any application for erasure of personal data and will balance the request against the exemptions provided for in the law. Where a decision is made to erase the data, and this data has been passed to other data controllers, and / or has been made public, reasonable attempts to inform those controllers of the request shall be made.

Right to restrict processing

13.11. In the following circumstances, processing of an individual's personal data may be restricted:

- 13.11.1. where the accuracy of data has been contested, during the period when the Setting is attempting to verify the accuracy of the data;
- 13.11.2. where processing has been found to be unlawful, and the individual has asked that there be a restriction on processing rather than erasure;
- 13.11.3. where data would normally be deleted, but the individual has requested that their information be kept for the purpose of the establishment, exercise or defence of a legal claim;
- 13.11.4. where there has been an objection made under para 8.2 above, pending the outcome of any decision.

Right to portability

13.12. If an individual wants to send their personal data to another organisation, they have a right to request that the Setting provides their information in a structured, commonly used, and machine-readable format. As this right is limited to situations where the Setting is processing the information based on consent or performance of a contract, the situations in which this right can be exercised will be quite limited. If a request for this is made, it should be forwarded to the DPO within 2 working days of receipt, and the DPO will review and revert as necessary.

14. Breach of the UK GDPR legislation

14.1. Any and all breaches of the UK GDPR, including a breach of any of the data protection principles shall be reported as soon as it is discovered, to the Data Protection Officer (DPO).

14.2. Once notified, the DPO shall assess:

- 14.2.1. the extent of the breach;
- 14.2.2. the risks to the data subjects as a consequence of the breach;
- 14.2.3. any security measures in place that will protect the information;
- 14.2.4. any measures that can be taken immediately to mitigate the risk to the individuals.

14.3. Unless the DPO concludes that there is unlikely to be any risk to individuals from the breach, it must be notified to the Information Commissioner's Office within 72 hours of the breach having come to the attention of the Setting, unless a delay can be justified.

14.4. The Information Commissioner shall be told:

- 14.4.1. details of the breach, including the volume of data at risk, and the number and categories of data subjects;
- 14.4.2. the contact point for any enquiries (which shall usually be the DPO);
- 14.4.3. the likely consequences of the breach;
- 14.4.4. measures proposed or already taken to address the breach.

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14.5. If the breach is likely to result in a high risk to the rights and freedoms of the affected individuals then the DPO shall notify data subjects of the breach without undue delay unless the data would be unintelligible to those not authorised to access it, or measures have been taken to mitigate any risk to the affected individuals.

14.6. Data subjects shall be told:

- 14.6.1. the nature of the breach;
- 14.6.2. who to contact with any questions;
- 14.6.3. measures taken to mitigate any risks.

14.7. The DPO shall then be responsible for instigating an investigation into the breach, including how it happened, and whether it could have been prevented. Any recommendations for further training or a change in procedure shall be reviewed by the Executive Principals Board and the Directorate Board and a decision made about implementation of those recommendations.

15. Data security and Storage

15.1. MACCA Sports Academies will protect data from unauthorised or unlawful access, processing or disclosure and against accidental or unlawful loss, destruction, communication or damage.

15.2. MACCA Sports Academies will ensure that:

15.2.1. Paper records and portable electronic devices (such as laptops and storage devices) that contain personal data are kept locked away when not in use

15.2.2. Documents containing confidential personal data will not be left on display in offices or within the environment of the setting, or left anywhere where there is general public access

15.2.3. Where personal data is displayed in a room where members of the public are invited, information will be hidden out of view or covered when not in use

15.2.4. Where Setting owned personal data needs to be taken off site, this must be done with the consent of the data controller and/or the DPO

15.2.5. IT system passwords will be strong and changed regularly

15.2.6. Encryption software is used to protect all laptops

15.2.7. Staff, children or other volunteers who store or process personal information on their personal devices are expected to follow the same security procedures, as per the IT Policy

15.2.8. Where data is shared with a third party, MACCA Sports Academies will carry out due diligence and take reasonable steps to ensure it is stored and transmitted securely

15.2.9. Where a member of staff no longer works for MACCA Sports Academies, they will be asked to permanently delete any personal data they may hold on staff, children or parents and return any IT hardware or software provided by MACCA Sports Academies Ltd. To be clear this includes but is not exclusive to; registers, child protection/safeguarding records and photos of attending children.

16. Disposal of data

16.1. Personal data that is no longer needed will be disposed of securely. Data that has become inaccurate or out of date will be updated if we have a legal basis to maintain it or deleted if not longer needed.

16.2. The disposal of data will be undertaken in accordance with MACCA Sports Academies's data retention policy.

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16.3. Data marked for disposal will be securely destroyed, by shredding for paper-based records. MACCA Sports Academies may use a third party to safely dispose of records on their behalf, ensuring that the third party complies with the data protection law.

17. Training

17.1. All staff are provided with data protection training as part of their induction.

17.2. Data protection training is also part of the CPD process for staff each year.

17.3. Where significant changes are applied to legislation, MACCA Sports Academies will make the necessary training available to ensure all staff are updated.

18. CCTV

18.1. MACCA Sports Academies provides its' services across settings that operate CCTV in various locations to ensure the staff, attending children and site resources remain safe and secure.

18.2. MACCA Sports Academies does not need to ask individuals' permission to use CCTV, however it should ensure clear signage informing users that the site has CCTV and how to ask for more information.

18.3. Further information is available within MACCA Sports Academies' CCTV policy.

19. Photographs and Videos

19.1. As part of MACCA Sports Academies activities, we may take photographs and record images of individuals within our Settings.

19.2. We will obtain written consent from parents/carers, or children, for photographs and videos to be taken of them/their child for communication, marketing and promotional materials across MACCA Sports Academies.

19.3. Where we need parental consent, we will clearly explain how the photograph and/or video will be used to the parent/carer or child. Where we don't need parental consent, we will clearly explain to the child how the photograph and/or video will be used.

Uses may include:

19.3.1. Within the Setting itself and in wider marketing brochures, newsletters, etc

19.3.2. Outside of setting by external agencies such as Setting photographer, newspapers, Local Authorities, etc

19.3.3. Online within our Setting websites or social media pages

19.4. Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute further

19.5. When using photographs and videos will not accompany them with any other personal information about the child, to reduce the risk of them being identified

19.6. See our child protection and safeguarding policy for more information on our use of photographs and videos

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20. Contact

20.1. If anyone has any concerns or questions in relation to this policy, they should contact the Data Protection Officer.

Data Protection Officer at MACCA Sports Academies, by email admin@maccasportsacademies.com or write to Data Protection Officer, Matthew Albinson, MACCA Sports Academies, 19 The Drove, Collyweston, PE9 3PR.

If at any time you are not happy with how we are processing your personal information, then you may raise the issue with the Data Protection Officer and if you are not happy with the outcome you may raise a complaint with the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane,
Wilmslow, Cheshire,
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

