



FINS SWIMMING CLUB POLICIES

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Fins Swimming Club Safeguarding Information and Emergency Contact Details

Welfare Officer

Name: Karen Porter
Tel: 01276 538312
Email: Safeguarding@FinsSwimmingClub.org

Children's Services Multi Agency Safeguarding Hub (MASH) Hampshire

Hampshire Tel: 0300 555 1384 (8.30am-5pm Mon to Thurs, 8.30am-4.30pm Fri)
Surrey Tel: 0300 470 1900 (9am-5pm Mon to Fri)

Out Of Hours/Emergency Duty Team

Hampshire Tel: 0300 555 1373
Surrey Tel: 01483 517898

Local Authority Designated Officer (LADO)

Hampshire Tel: 01962 876364
Surrey Tel: 0300 123 1650 (Monday to Friday, 9.00am-5.00pm)

Police Child Protection Investigation Team

Tel: 101, ext 39667

National Governing Body (NGB)

Swim England Child Safeguarding Team
Pavilion 3, Sports Park, 3 Oakwood Drive
Loughborough University
Leicestershire LE11 3QF
Tel: 01509 640 700
E-mail: safeguarding@swimming.org
Website: www.swimming.org

Swim England Safeguarding and Welfare Team

Tel: 01509 640 700 (Option 1 for Swim England, then Option 3 for Safeguarding)
E-mail: safeguarding@swimming.org

Swim England Disclosure and Barring Service Checks (DBS)

E-mail: dbs@swimming.org

Swimline the Swim England/NSPCC Child Protection Helpline

Tel: 0808 100 4001

Swim England Signposting Help Desk

E-mail: signposting@swimming.org

Other Services

NSPCC Child Protection in Sport Unit (CPSU)

Tel: 0116 366 5580

E-mail: cpsu@nspcc.org.uk

Website: www.thecpsu.org.uk

NSPCC Helpline

Tel: 0808 800 5000

Website: www.nspcc.org.uk

ChildLine

Tel: 0800 1111

Website: www.childline.org.uk

FSC Child Safeguarding Policies

Fins Swimming Club refers to the Policies and Procedures contained in the [Wavepower](#) files on the British Swimming website as a guideline for best practice. The files contain mandatory requirements, practical information and good practice guidance all in one place. Fins Swimming Club has adopted the [Wavepower](#) policies and procedures where mandatory and will be working towards adopting other policies where appropriate.

The responsibility to safeguard children does not belong to any one person, but instead belongs to everyone who plays a part in delivering our sporting activities. [Wavepower](#) is intended for anyone involved in these activities and offers practical guidance and information on mandatory requirements and good practice.

It is to be used by all employed and self-employed staff, parents, children and all those who work with young members so that everyone involved in the sport can play their part in safeguarding children and young people.

<https://www.swimming.org/swimengland/wavepower-child-safeguarding-for-clubs/>

Child Safeguarding Policy Statement

Fins Swimming Club (FSC) is committed to providing an environment in which all children and young people participating in its activities have a safe and positive experience. All staff at FSC have a part to play in looking after the children with whom we are working. We recognise that the welfare of the child is paramount, as enshrined The Children Acts 1989 and 2004 as amended by the Children and Social Work Act 2017 and the Government document “Working Together to Safeguard Children 2018”.

Our aims:-

- To ensure that the child’s welfare is the first consideration.
- To recognise that all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.
- Ensure that all individuals who work with children at FSC, whether paid or voluntary, provide a positive, safe and enjoyable experience for children.
- Appoint a Welfare Officer who will take the lead in dealing with all child safeguarding matters raised within the organisation.

- Ensure that the Welfare Officer's name and contact details are known to all staff, swimmers and parents of swimmers.
- Ensure the Welfare Officer is available to discuss issues of concern on matters of safeguarding and deal with such concerns appropriately.
- Ensure that all individuals who work with children at FSC have undertaken appropriate training, have had the relevant DBS checks and follow practices for safeguarding children as outlined in [Wavepower](#).
- Provide all staff of FSC and parents of swimmers with the opportunity to raise concerns in a safe and confidential manner if they have a concern about a child's welfare.
- Ensure that all child safeguarding matters, whether they be concerns about child welfare or protection, are dealt with appropriately following the guidance set out in [Wavepower](#).
- Ensure that confidentiality is maintained appropriately and in line with the best interests of the child.
- Ensure all papers relating to child safeguarding matters are held in a safe and secure manner.

Anti-Bullying Policy

Statement of Intent

Fins Swimming Club is committed to providing a caring, friendly and safe environment for all of our colleagues and swimmers so they can work/swim in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at our club. If bullying does occur, all colleagues, swimmers or parents should be able to tell and know that incidents will be dealt with promptly and effectively. This means that anyone who knows that bullying is happening is expected to report this to the Manager.

For further information on bullying, please follow the link below to the Swim England Child Safeguarding Policies and Procedures document [Wavepower](#).

<http://www.swimming.org/swimengland/wavepower-child-safeguarding-for-clubs/>

Procedures

- Report incidents of bullying to the Manager/Welfare Officer or another officer/employee of Fins Swimming Club.
- In cases of serious bullying, the incidents are to be recorded by that person and referred to the welfare officer if he/she is not already aware. In serious cases, parents should be informed and will be asked to attend a meeting in person to discuss the problem.
- If necessary and appropriate, the police will be consulted.
- The bullying behaviour, or threats of bullying, must be investigated and the bullying must be stopped quickly.
- If bullying is found on the 'balance of probability' to have taken place, then appropriate action will be taken. This includes attempting to help the bully/bullies to change their behaviour.

Outcomes

- The bully/bullies may be asked to genuinely apologise. Other consequences may take place.
- In serious cases, suspension or even exclusion will be considered.
- If possible, the members will be reconciled.
- After the incident(s) have been investigated and dealt with, each case will be monitored to ensure repeated bullying does not take place.

Whistleblowing Policy and Procedure

For further information on whistleblowing, please follow the link below to the Swim England Child Safeguarding Policies and Procedures document [Wavepower](http://www.swimming.org/swimengland/wavepower-child-safeguarding-for-clubs/).

<http://www.swimming.org/swimengland/wavepower-child-safeguarding-for-clubs/>

The concept of whistleblowing is important in any organisation that is committed to maintaining appropriate levels of safeguarding and good practice. Whistleblowing allows individuals to raise the alarm on any potential incident of poor practice or misconduct by members and staff. Fins Swimming Club is committed to developing a culture that is safe and encourages all those involved in aquatics to raise concerns of poor and/or unacceptable practice, breaches in safeguarding and/or incidents of abuse.

What to do if you want to report a concern

Contact our Office Manager either by telephoning 07939 655420 or by emailing Office@FinsSwimmingClub.org.

Your concern will be investigated fully and referred to the Director/s and/or necessary authorities where required.

The concern you raise will be treated in strictest confidence and will be shared only on a need-to-know basis.

You will be given updates on how the enquiry is progressing if it is possible to do so. Fins Swimming Club has a responsibility to protect you from harassment of any kind that results from your disclosure.

If the matter is proven/found on the balance of probabilities to be so the appropriate action will be taken against the individual(s) concerned.

If the matter is unproven/unfounded on the balance of probabilities to not have occurred, providing you raised the concern in good faith, no action will be taken against you.

Malicious allegations will be considered as a disciplinary offence.

Every effort will be made to provide feedback to you on the outcome and action taken on the matter you referred, but how much detail can be reported back to you will vary according to the nature and result of the investigation.

Complaints / Allegations Procedure

We take complaints or allegations about our work, teachers, staff and levels of service very seriously. If you are not satisfied, please follow the process for raising a formal complaint or allegation.

If you want to speak to someone about a complaint or allegation, you can call our office on 07939 655420 (office hours are 10:00am to 2:00pm Monday to Friday, excluding bank holidays), where we will try to resolve the issue if we can.

If you prefer to put your complaint in writing, please either send an email for the attention of The Manager to Office@FinsSwimmingClub.org

What information we'll need from you

We will need:

- a clear, detailed description of what your complaint is about
- copies of any letters or emails related to the complaint

We aim to respond to complaints within 2 working days. If we can't reply to you within this time, we will let you know and tell you when you can expect a reply.

What happens next

When you've made your complaint, we will:

- send an email to let you know that we've received it (as long as you've provided a valid email address);
- fully investigate your complaint (looking at whether your questions were answered and what remedy would be fair and proportionate in the circumstances);

What to do if you're not satisfied.

If you are not satisfied with the outcome of your formal complaint you can ask for your complaint to be escalated to the Director/s.

Equity Policy

Fins Swimming Club is committed to ensuring that equity is incorporated across all aspects of its development. In doing so it acknowledges and adopts the following Sport England definition of sports equity:

Sports equity is about fairness in sport, equality of access, recognising inequalities and taking steps to address them. It is about changing the culture and structure of sport to ensure it becomes equally accessible to everyone in society. The swimming club respects the rights, dignity and worth of every person and will treat everyone equally within the context of their sport, regardless of age, ability, gender, race, ethnicity religious belief, sexuality or social/economic status.

The swimming club is committed to everyone having the right to enjoy their sport in an environment free from threat of intimidation, harassment and abuse. All swimming club clients have a responsibility to oppose discriminatory behaviour and promote equality of opportunity. The swimming club will deal with any incidence of discriminatory behaviour seriously and appropriately.

Disabled / Special Needs

Any person who approaches Fins Swimming Club to participate in our lessons that are disabled / special needs / minority groups are welcomed and participate within the normal programme.

All office staff are briefed on how to take a booking and the following is the swimming club procedures for accommodating the above groups within the programme:

At the time of booking ask the prospective client about their requirements and explain how we would be able to accommodate them within our programme. We endeavour to have only one disabled / special needs client within each class at any one time. The information received about the disability / special need is noted by code on our system and given to the teacher. Should additional knowledge be required, we then check via the internet to get full facts about the disability / special need and should more technical knowledge be required, we will consult a GP to help us understand how we would best teach that client and what difficulties there might be. Please note there are some physical access limitations due to the school swimming pools used.

Equal Opportunities in Swimming

Equal Opportunity is about celebrating difference and diversity and as such providing a swimming structure that can respond to this in a proactive and positive manner. Fins Swimming Club is totally committed to the principals and practice of equal opportunities across all of its aquatic disciplines, both as an employer, provider and as facilitator of such practices by all its members. In our work with key partners, such as the athletes, clubs, teachers, coaches, officials and administrators, we will advocate our policies and make every effort to ensure that all participation has equity at its core. Swimming is a 'sport for all'. It can and should be enjoyed and made accessible to everyone and to achieve this.

Fins Swimming Club:-

- Is committed to work towards ensuring that swimming is accessible to the many, rather than the few.
- Recognises the need to acknowledge the diversity of provision that is required to ensure that all people, regardless of their race, sex / gender, disability, age, sexual orientation, social or economic background can access swimming and develop at a level that is appropriate to them.
- Recognises the need to celebrate differences and diversity of provision as a means of creating entitlement and accessibility to our structures.

- Recognises that equal opportunity is about recognizing that people are different and therefore require different provision.
- Recognises the need to consult widely in order to respond to diversity.

In addressing equal opportunities, Fins Swimming Club will respond to issues of equity by: -

- Recognising that swimming as an organisation, our staff, athletes, coaches, teachers, officials and administrators need to adapt and work flexibly in order to respond to the needs of a wide and diverse range of people.
- Take positive action to increase the involvement from under-represented groups in all aspects of our organisation, participation, coaching, teaching, officialdom etc.

In doing so Fins Swimming Club supports four key principals as being fundamental to ensuring that everyone can participate in our sport and the achievement of equality of opportunity:-

Entitlement: People have a right to participate in and access quality and appropriate experiences within diving, swimming, synchronised swimming and water polo.

Accessibility: It is the responsibility of Swim England - our teachers, coaches, officials and administrators - to adapt provision to fit the needs of the many.

Inclusion: Wherever and whenever possible, all to access the same quality of provision, and if necessary to use positive action to ensure this.

Integrity: Whatever we do as an Association to change or adopt provision, it must be of equal worth, challenging, relevant and in no way patronising.

Children with Specific Needs

Fins Swimming Club will embrace those children who may require specialised care due to disabilities and will ensure that:

- All parents/guardians are aware of the qualifications of Fins Swimming Club Teachers involved in the aquatic development of children with specific needs and disabilities.
- The views of the child and parent/carer are always obtained prior to any activity, specifically those requiring any physical handling or of a physical nature, to gain both consent and agreement of all concerned.
- No child is discriminated against in any manner by Fins Swimming Club or any swimmer or from taking part in an activity which it is safe and proper for them to undertake.

Some children will suffer with an illness but show no outward appearance of being a child with specific needs, such as those diagnosed with epilepsy or diabetes. Fins Swimming Club will co-operate with parents on their child's needs should they develop an attack at the lessons. Such children will not be excluded or prevented from taking part in any sporting activity in which all other swimmers are entitled to take part, as this would be discriminatory. With the correct knowledge and information, and the required parental support, children with such illnesses can enjoy their lessons as any other swimmer.

Humanity at Fins Swimming Club

Teachers and other colleagues at Fins Swimming Club must respect the rights, dignity and worth of every human being and their ultimate right to self-determination. Specifically, Teachers and colleagues must treat everyone equally within the context of their activity, regardless of sex, ethnic origin, religion, disability or political persuasion.

Relationships at Fins Swimming Club

Fins Swimming Club will be concerned primarily with the well-being, health and future of the individual performer and only secondary with the optimisation of performance. A key element in a teacher relationship is the development of independence. Teachers are responsible for setting and monitoring the boundaries between a working relationship and friendship with their performers. The Teacher must realise that certain situations or friendly actions could be misinterpreted, not only by the performer, but by outsiders motivated by jealousy, dislike or mistrust and could lead to allegations of sexual misconduct or impropriety. The relationship between Teacher and performer relies heavily on mutual trust and respect.

Commitment at Fins Swimming Club

Fins Swimming Club should clarify in advance with performers and parents/guardians the number of sessions, fees and method of payment. They should also explore with performers/parents/guardians the expectation of the outcome of teaching.

Integrity at Fins Swimming Club

Teachers should refrain from public criticism of fellow Teachers. Differences of opinion should be dealt with on a personal basis by Anna Strong or Sarah Beavis.

Personal Standards of Fins Swimming club

The Teacher must consistently display high personal standards and project a favourable image of their sport and of teaching - to performers, other Teachers/colleagues, spectators, the media and the general public. Personal appearance is a matter of

individual taste, but Teachers have an obligation to project an image of health, cleanliness and functional efficiency.

Safety at Fins Swimming Club

Teachers have a responsibility to ensure the safety of the performers with whom they work as far as possible within the limits of their control. All reasonable steps should be taken to establish a safe working environment. The work done and the manner in which it is done should be in keeping with regular and approved practice within that sport.

The activity being undertaken should be suitable for the age, experience and ability of the performers. Performers should have been systematically prepared for the activity being undertaken and made aware of their personal responsibilities in terms of safety.

Privacy Policy

Fins Swimming Club is committed to protecting your privacy when you use our services.

Please read our Privacy Notice carefully as this sets out how and why we collect personal information. By providing us with personal information you consent to the processing and transferring of personal information as set out in this Privacy Policy.

For the purposes of the Data Protection Act 1998 (the "Act") and the more recent General Data Protection Regulation (GDPR) effective from 25th May 2018, the Data Controller is Fins Swimming Club, c/o Pestors, Unit 2 Park Court, Pyrford Road, West Byfleet, Surrey KT14, registered in England with company number 07402878.

Fins Swimming Club is registered with the Data Protection Registry (ICO) and takes its commitments and obligations under the General Data Protection Regulation (GDPR) and that of The Privacy and Electronic Communications (EC Directive) Regulations 2003 very seriously.

Customer/User details are treated with the utmost respect and our staff are trained in the observance of the General Data Protection Regulation (GDPR).

The Privacy Notice below explains how we use information about you and how we protect your privacy.

We have a Data Protection Officer who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Officer, at Office@FinsSwimmingClub.org

Do you know what personal information is?

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person.

Information we may collect about you may include (but is not limited to):

Name

Address

Telephone numbers

Email addresses

Data of birth

Gender

Health data

Computer IP address

Dependent Details (only where applicable)

Did you know that some of your personal information might be classified as 'special'? Some information is 'special' and needs more protection due to its sensitivity. It's often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal information relating to your:

Sexuality and sexual health
Religious or philosophical beliefs
Ethnicity
Physical or mental health
Trade union membership
Political opinion
Genetic/biometric data
Criminal history

We will only collect this type of information if it is necessary to your contract so that we can provide the right services to you.

We may at times need to share this information. We will only do this if we have your consent or if there are legal requirements for us to do so. We may receive information about you from other data controllers, such as the police who might tell us about a crime they are investigating where this impacts on your contract with us. If you give us this information about yourself when communicating with us, you do so because you consider it forms part of a legitimate interest for us to hold this information on our records.

If we ask for any sensitive personal data about you, we will always tell you why we need it and ask for your consent to hold it.

Why do we need your personal information? We may need to use some information about you to:

- deliver services and support to you;
- to carry out our obligations arising from any contracts entered between you and us;
- manage those services we provide to you;
- service improvement
- prevention/detection of crime/fraud
- help investigate any complaints you have about our services;
- check the quality of our services;

How the law allows us to use your personal information

There are a number of legal reasons why we need to collect and use your personal information.

Generally, we collect and use personal information for the purposes of where:

- you are entering or have entered into a contract with us
- you, or your legal representative, have given consent
- it is necessary to protect someone in an emergency
- it is required by law
- you have made your information publicly available
- it is necessary for legal cases
- it is necessary for archiving, research, or statistical purposes

Consent and Your Preferences

We may contact you or send communications to tell you about a service enhancement such as improvements to your local site or to keep you informed of your current membership status. We won't need your consent to communicate with you this way because we have assessed that it forms part of our agreement with you and it is of mutual interest for us to keep you informed and is relevant to your contract with us.

We would like to occasionally send you information on other products and services we offer, and which we think will be of interest to you, e.g. holiday intensive courses, Distance Day, Awards Presentations etc. We will ask for your consent to communicate this type of information to you, you can remove your consent and ask us to stop at any time.

If we have consent to use your personal information to send you information on our products and services, you have the right to remove it at any time. You can do this by contacting us at Office@FinsSwimmingClub.org or by phoning 07939 655420.

We only use what we need!

Where we can, we'll only collect and use personal information if we need it to deliver a service or meet a requirement.

If we don't need personal information, we'll either keep you anonymous if we already have it for something else or we won't ask you for it. For example, in a survey we may not need your contact details, so we'll only collect your survey responses.

If we use your personal information for research and analysis, we'll keep you anonymous or use a different name unless you've agreed that your personal information can be used for that research.

We won't sell your personal information to anyone else.

We will always provide an option for updating your marketing preferences on our communications with you.

What you can do with your information

The law gives you a number of rights to control what personal information is used by us and how it is used by us.

You can ask for access to the information we hold on you

You have the right to ask for the information we have about you. When we receive a request from you in writing, we must give you access to what personal information we've recorded about you.

However, we can't let you see any parts of a record which contain:

- Confidential information about other people; or
- May be held in preparation to defend legal claims

This applies to personal information that is in both paper and electronic records. If you ask us, we'll also let others see your record (except if one of the points above applies).

A request for personal information can be made via email or in writing. This is known as a subject access request. To make a subject access request you will need to provide the following information:

- your name
- your address
- proof of identity and signature
- enough information to identify your records

What types of documents could I submit as proof of ID?

- Copy passport with signature (please remove your passport number)
- Copy driving license picture with signature (please remove your driver number)

You can write to us at the following address:

Data Protection Officer
Fins Swimming Club
c/o Pestors
2 Park Court
West Byfleet
Surrey
KT14 6SD

We will not start your subject access request until we are satisfied that you have provided us with enough information for us to identify you.

Once you have made a request you will receive an acknowledgement and your request should be answered within one month. In certain circumstances, we are allowed to take longer but we will tell you if we feel we may need longer without undue delay from when we receive your request.

You can ask to change information you think is inaccurate

You should let us know if you disagree with something we may have recorded about you.

We may not always be able to change or remove that information, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Please contact Office@FinsSwimmingClub.org and we can deal with your request.

You can ask to delete information (right to erasure)

In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place
- Where you have removed your consent for us to use your information (where there is no other legal reason us to use it)
- Where there is no legal reason for the use of your information
- Where deleting the information is a legal requirement

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- we're required to have it by law
- it is for historical research, or statistical purposes where it would make information unusable
- it is necessary for legal claims

You can ask to limit what we use your personal data for

You have the right to ask us to restrict what we use your personal information for where:

- you have identified inaccurate personal information, and have told us of it
- where we have no legal reason to use that information, but you want us to restrict what we use it for rather than erase the information altogether

We will assess whether you have a right to a restriction and where restriction of use has been granted, we'll inform you before we carry on using your personal information.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law or we have a legal basis to do so, such as a contract.

You can ask to have your information moved to another provider (data portability)

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

However, this only applies if we're using your personal information with consent (not where we are processing your personal information for contractual, legitimate interests, legal obligations or vital interests as a legal basis) and if decisions were made by a computer and not a human being.

It's likely that data portability won't apply to the services you receive from Fins Swimming Club.

Visiting our website

When you visit our website (www.finsswimmingclub.org) we collect standard internet log information for statistical purposes.

- We use cookies to collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

- We do not make any attempt to identify visitors to our websites. We do not associate information gathered from our sites with personally identifying information from any source.
- When we collect personal information, for example via an online form, we will explain what we intend to do with it.

Using cookies helps us to improve our site and to deliver a better and more personalised service.

Our websites contain links to various third-party websites. We are not responsible for the content or privacy practices of any external websites that are linked from our sites.

Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or are associated with, the processing of your personal information, are obliged to make reasonable efforts to safeguard it.

How we use your telephone number

Text messages and contact via telephone provide a direct way to contact and share information with you about the services we can deliver to you. It can also help you to receive important messages about your membership, important site updates e.g. temporary closures and other services that we provide you.

If you provide your telephone number, we may keep in contact with you by text.

Operational SMS/text messaging and calls

If you supply us with your telephone contact details, we may use them to call or send you operational text messages.

Examples of operational text messages include:

- Confirming a booking, that you have requested
- Emergency pool updates relating to your allocated pool
- Asking you to contact a named person □ Satisfaction surveys

Sharing your telephone number with third parties

We may pass your telephone number to third parties so that we can meet our contractual obligations with you. We may also share your telephone numbers if we are required to by law.

We may supply the details to our approved third-party contractors who are delivering or performing services on our behalf, and these companies must not use your information for any other purpose. We never share or sell your telephone numbers to telesales/marketing companies.

Who do we share your information with?

We use a range of organisations to either store personal information or help deliver our services to you. Where we have these arrangements, there is always an agreement in place to make sure that the organisation complies with data protection law.

We may enter into partnerships with other organisations such as local authorities and the police. To protect your information, we will enter into a legally binding data sharing agreement with partner organisations before any sharing takes place. It is not always possible for us to tell you that personal information is being shared, for example when we are working with the police or other agencies to help the investigation or detection of a crime as to do so may prejudice that investigation.

We are likely to share your personal information with the following:

- Police

We may share your personal information with the police for the purposes of preventing or detecting a crime or fraud.

- Safeguarding and Support Agencies

We may need to share your personal information with support agencies if we suspect that there may be safeguarding concerns about yourself or those who are your dependent(s). We will not tell you about this beforehand, we will take steps to only share that personal information which is necessary for the safeguarding purposes.

- Debt Recovery Agents

We may share your personal information with debt recovery agents for the purposes of recovering any outstanding charges owed to us.

- Legal Services and Partners

We may share your personal information with our legal services or solicitors if we are preparing or defending a legal claim.

- Business Asset Transactions

If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- Local council organisations offering grants

Example - 'Active Surrey' financially supports FSC to offer free swimming lessons to some groups of swimmers. Anonymous information about participants is shared with the Active Surrey Upshot system in order to record eligibility for the grants offered.

If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

Where there is a high risk to your personal information we will complete a privacy assessment before we share personal information to make sure we protect privacy and comply with the law.

Sometimes we have a legal duty to provide personal information to other organisations, this is often because we need to give that data to the police, courts, local authorities or government bodies.

We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy. This doesn't happen often, but we may share your information:

- to detect and prevent a crime and fraud; or

- if there are serious risks to the public, our staff or to other professionals;
- safeguarding of vulnerable individuals

If we're worried about your physical safety or feel we need to act to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

For all these reasons the risk must be serious before we can override your right to privacy.

We may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away.

If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe to do so and will not cause harm, distress or further risks to you, our staff, other professionals and/or the public.

How do we protect your information?

We'll do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'
- Pseudonymisation, meaning that we'll use a different name, so we can hide parts of your personal information from view. This means that someone outside of Fins Swimming Club could work on your information for us without ever knowing it was yours
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches)

Where in the world is your information?

The majority of personal information is stored on systems in the UK. But there may be some occasions as our technology services progress where your information may leave the UK either to get to another organisation or if it's stored in a system outside of the EU.

We will always have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

We'll take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

How long do we keep your personal information?

There's often a legal or a contractual reason for keeping your personal information for a set period. We will keep your information for the duration of providing a service or product to you under the terms of a contract, such as your membership contract. When your contract has ended we will keep your personal data for 18 months for auditing and reporting purposes and for legitimate interest purposes, after that time we will either anonymise or destroy your information.

You can ask us for a copy of our retention periods by contacting us at:

Data Protection Officer
Fins Swimming Club
c/o Pestors
2 Park Court
West Byfleet
Surrey
KT14 6SD

How to tell us of a data breach

Fins Swimming Club takes responsibility to protect the personal information we hold about those with whom we work seriously. We are accountable for our processing and take necessary technical and operational steps to maintain information security protections.

If you suspect your personal information or that of others may have been at risk of a data protection breach, please contact us immediately on Office@FinsSwimmingClub.org or by phoning 07944 165604.

Where can I get advice?

If you have any worries or questions about how your personal information is handled, please contact our Data Protection Officer at: Office@FinsSwimmingClub.org

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

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.

Alternatively, visit ico.org.uk or email casework@ico.org.uk