



SABAIN ACADEMY BOXING & EDUCATION CIC (SABE)

Data Protection and Privacy Policy

Version: 2026

Effective Date: August 2026

Review Date: August 2027

1. Policy Statement

Sabain Academy Boxing & Education CIC (SABE) is committed to protecting the privacy and personal information of everyone we work with. We recognise that children, young people, parents, carers, staff, volunteers and partners trust us with their information, and we are committed to handling it responsibly, securely and in accordance with UK data protection legislation.

We will only collect, use, store and share personal information where it is lawful, necessary and proportionate.

2. Purpose

The purpose of this policy is to ensure SABE:

- Complies with UK data protection legislation.
- Protects personal information from loss, misuse or unauthorised access.
- Maintains public confidence.
- Promotes good information governance.
- Protects the rights and privacy of individuals.

3. Scope

This policy applies to:

- Directors
- Employees
- Coaches
- Volunteers

- Contractors
- Participants
- Parents and carers
- Partner organisations handling information on SABE's behalf

It applies to both paper and electronic records.

4. Legal Framework

This policy is based on:

- UK General Data Protection Regulation (UK GDPR)
 - Data Protection Act 2018
 - Privacy and Electronic Communications Regulations (PECR), where applicable
 - Human Rights Act 1998
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5. Data Protection Principles

SABE will ensure personal data is:

- Processed lawfully, fairly and transparently.
 - Collected only for specified, legitimate purposes.
 - Limited to information that is necessary.
 - Accurate and kept up to date.
 - Retained only for as long as necessary.
 - Stored securely.
 - Protected against unauthorised access, loss or misuse.
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6. Information We May Collect

Depending on the activity, SABE may collect:

- Names
- Dates of birth

- Contact details
- Emergency contacts
- Parent or carer details
- Medical information relevant to participation
- Accessibility or support requirements
- Attendance records
- Accident and incident records
- Safeguarding records
- Volunteer and staff information
- DBS information (where applicable)
- Monitoring information for funding purposes

We only collect information necessary for delivering our services safely and effectively.

7. Lawful Basis for Processing

SABE processes personal information using lawful bases under UK GDPR, including:

- Consent
- Performance of a contract
- Legal obligation
- Legitimate interests
- Protection of vital interests where appropriate

Special category information, such as medical or safeguarding information, will only be processed where permitted by law and where appropriate safeguards are in place.

8. How We Use Information

Personal information may be used to:

- Register participants.
- Deliver activities safely.

- Contact parents or carers.
- Respond to emergencies.
- Manage safeguarding concerns.
- Monitor attendance.
- Evaluate projects.
- Meet funding requirements.
- Improve services.
- Meet legal obligations.

We will never sell personal information.

9. Sharing Information

Information will only be shared when necessary and lawful.

This may include:

- Emergency services
- Children's Social Care
- Police
- Lewisham Council
- Schools (where appropriate)
- Funding bodies where anonymised or required
- England Boxing where appropriate
- Insurance providers

Information will only be shared with organisations that have a legitimate reason to receive it.

10. Data Security

SABE will protect information by:

- Using password-protected devices.

- Restricting access to authorised individuals.
- Locking paper records securely.
- Using secure cloud storage where appropriate.
- Maintaining antivirus and software updates.
- Securely disposing of confidential documents.

Personal information must never be left unattended or shared without authorisation.

11. Data Retention

Information will only be kept for as long as necessary.

When records are no longer required they will be securely destroyed by:

- Confidential shredding of paper records.
 - Permanent deletion of electronic files.
 - Secure disposal of storage devices where appropriate.
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12. Individual Rights

Individuals have the right to:

- Be informed about how their information is used.
- Request access to their personal information.
- Request correction of inaccurate information.
- Request deletion where appropriate.
- Restrict processing in certain circumstances.
- Object to certain processing.
- Request data portability where applicable.

Requests will be handled within the legal timescales.

13. Confidentiality

All staff, coaches and volunteers are expected to maintain confidentiality.

Information should only be discussed with people who have a legitimate need to know.

Confidentiality may be overridden where safeguarding concerns or legal obligations require information to be shared.

14. Photography and Video

Photographs and videos will only be taken:

- With appropriate consent where required.
- For legitimate organisational purposes.
- In accordance with safeguarding procedures.

Images will be stored securely and only used for approved purposes.

15. Data Breaches

Any suspected loss, theft or unauthorised disclosure of personal information must be reported immediately to a Director.

SABE will:

- Investigate all breaches.
- Take immediate action to reduce any risk.
- Notify the Information Commissioner's Office (ICO) where legally required.
- Inform affected individuals where appropriate.

16. Staff Responsibilities

All staff, coaches and volunteers must:

- Follow this policy.
- Protect confidential information.
- Keep passwords secure.
- Report data breaches immediately.
- Complete any required data protection training.

Failure to follow this policy may result in disciplinary action.

17. Monitoring and Review

This policy will be reviewed:

- Annually.
 - Following legislative changes.
 - Following significant organisational change.
 - Following any serious data breach.
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Data Protection Leads

Valissa Shay

Director of Community Strategy & Partnerships

Aaron Morris

Director of Boxing

Contact

Questions about this policy or requests relating to personal information should be directed to SABE's Directors.

Policy Approval

Approved by the Board of Directors of Sabain Academy Boxing & Education CIC.

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