



RED DRAGON'S MARTIAL ARTS Data Protection Policy

This Data Protection Policy, Privacy Notice and Information Audit/Record of Processing Activity comply with the General Data Protection Regulation 2018.

Any personnel working with The Red Dragon's Martial Arts School (RDMA) are required to abide by this policy. At the time that this is written, and for the foreseeable future, the owner (Chief Instructor, Lloyd Lewis) and RDMA Business Manager (Amanda Lewis) and a small and highly GDPR compliant team who maintain the Martial Arts database, are the only personnel with access to members records.

1. Maintaining confidentiality and sharing information

RDMA will keep confidential any information about RDMA school members and their family, which has been shared with us. Members information will not be shared with any persons or third parties, unless it is with your prior written consent i.e. for the purpose of supporting your or your child's well-being and development, in such cases it will be made clear with whom the information will be shared, what information will be shared and in what way: whether verbal, written or *electronic.

RDMA School works with young people and as such we are committed to making it a safe learning environment. We would liaise with you if ever there was a safeguarding matter, unless the circumstances required us to share the information with First Response without your consent if or when we are duty bound to do so. The School is run and managed by former secondary school teachers who are trained and experienced in dealing with matters relating to safeguarding and child protection issues.

If we are having a conversation about a private matter I will endeavour to be respectful of you or your child's confidentiality and have the conversation out of the earshot of other children, parents or members. If this is not possible we may make an arrangement to have a conversation at another time, when other members etc. are not present.

In order to maintain a respectful, trustworthy environment I would be grateful if you would in turn respect the confidentiality of my family and the other families who attend the RDMA classes.

*During COVID-19 threat, social distancing and lockdown, consideration to safeguarding and forms of continued service delivery have been fully considered, please see section 4 of the RDMA GDPR Privacy Notice for updated detail.

2. Data Protection - the purpose of this policy

The purpose of this policy is to evidence our accountability and compliance with the GDPR 2018 which replaces and extends individual rights to privacy under the Data Protection Act 1998. In addition to this policy, please see our Privacy Notice for RDMA Members which sets out for your information, how I, 'the data controller', processes the data you have provided about yourself, your child or family, for example how it is stored and shared. 'Data' is information which is stored electronically, on a computer, or on paper. The 'data' can be anything from a name, a home address, a photo, an email address, bank details, posts on social networking websites, or medical information.

3. Compliance with the GDPR

RDMA personnel comply with the seven principles of the GDPR which say that the data processing must be lawful and transparent; only used for the purpose for which it was originally requested (unless with further consent); limited to what is necessary, accurate and kept up to date; retained or deleted appropriately; processed with integrity and responsibly to avoid loss or damage; and as the data controller I (Lloyd Lewis) and my personnel are accountable and must demonstrate GDPR compliance.

Under the GDPR you have certain rights to your own information, which are detailed in the Privacy Notice. The Privacy Notice can be accessed by you on our website at any time. The Privacy Notice explains the 'lawful basis' for holding your/your child's information and your/your child's rights as a 'data subject' and how long the records will be kept. In accordance with the GDPR, we will not keep information any longer than is necessary.

Information including detail such as a person's racial or ethnic origin, political opinions, religious or similar beliefs, physical or mental health condition or sexual life, or any offence committed or alleged to have been committed is known as 'Special category data' (particularly sensitive information) It is very unlikely that any of this data will be recorded at RDMA, if it is provided to me i.e. as a medical record, The category of 'lawful basis' is implied for processing and additionally one of seven 'special conditions' (lawful reasons), one of which is 'explicit consent'.

As a data controller, I (Lloyd Lewis) am registered (Data Protection Fee) with the Information Commissioner's Office. Registration is renewed annually. RDMA uses a highly secure software system to sort data and forms completed for enrolment are stored securely at the RDMA owner's home to comply with Information Commissioner Office guidance. When looking at or signing members details forms, we ensure that information is not visible to another member or member of the public. Children's records are accessed only by myself and the Business Manager.

Paper documents will be shredded. Information on digital storage devices will be deleted when it is no longer required. Electronic devices which are used for work are PIN/password protected.

4. *Compliance with COVID-19 NHS Test and Trace

For the purposes of compliance and assistance of the NHS Test and Trace service, RDMA will help to control the rate of transmission and reduce the spread of the infection and save lives by keeping a record of members attending and alert the NHS and members who have come into contact with anyone infected, if it occurs, accordingly. In order to do this, we will collect and safely keep a record of class registers for the required 21 days and then destroy any paper copy. This way we as a business can directly help to contain the virus by reducing its spread and ease lockdown measures. We would only share contact details through the correct channels and solely for these purposes.

5. Our Data Processor

RDMA use a specially designed CRM system (Customer Relationship Management) called MAT (Martial Arts Technology) which is created by Whitewave IT.

MAT has been specifically built with the martial arts industry in mind and works with leading martial arts clubs to ensure the club runs efficiently and effectively. MAT holds and processes personal information on our behalf.

MAT Features include: Manage Members, Prospect Handling, Annual Renewals, Subscription Management, Family / Linked Memberships, Attendance Monitoring. It is used to manage the schools regular classes and one off events, gradings and assessments, communication including SMS and email (individual and bulk), to track communications and information against members and it is where we input notes on members such as medical information. We also use it to find automated notes added by system, generate reports, conduct marketing analysis and view member /transaction and attendance.

This platform has been specifically designed and configured to support the martial arts industry. It is trusted by many clubs/schools and is fully GDPR compliant.

6. Data breach

RDMA and MAT must report any data breach to the ICO if, for example, personal data was lost, destroyed, shared inappropriately, or if someone accessed information without permission. Members have the right to complain to the ICO.

If a data breach occurred you would be informed and it would be addressed promptly. Every effort would be made to contain data breach and steps will be taken to establish the severity (any possible negative effect) and tell the ICO, if required. If it is decided not to report the breach, this decision would be justified in the recording of the incident in a Log of Data Breaches, and considerations made on how to ensure that the data breach could not occur again. Data breaches must be dealt with within 72 hours and failure to notify a breach may result in a fine.

The **ICO Helpline 0303 123 1113** will be used for advice.

RDMA do not position systems that display personal data in such a way that passer-by's may be able to view it, we think about the position and location of computer terminals and lock systems when not in use. We do not leave any paper-based notes in a unsecure place and shred them when no longer required. RDMA do not post screenshots of personal data in any online forum.

7. Children's rights

Children have the same rights as adults over their personal data. As a data controller I must obtain the consent of a parent or guardian when processing the personal data of a child under 16 and this is indicated on the enrollment forms. When seeking consent, we make reasonable efforts to verify that the person giving consent does, in fact, hold parental responsibility (as a point of information: in the U.K. only children aged at least 13 or over are able provide their own consent **online** for Information Society Services (ISS), such as consent to use gaming apps).

There is other information which RDMA may ask for, which is based on consent, you have the option to refuse or withdraw consent, for example you may not wish photographs to be taken of your child.

8. Children's Code

The Children's Code (or Age Appropriate Design Code to give its formal title) is a data protection code of practice for online services, such as apps, online games, and web and social media sites, likely to be accessed by children.

Although we are not an online based service, we do use some forms of social media and online platforms, namely Zoom and Facebook, for classes and communications particularly; during national lockdowns when we are not permitted to teach face to face and must resort to use of the internet. We are committed to adherence of data protection law and are extra vigilance to ensure all our young members are protected in this regard and can safely access continuation of their classes and engagement.

The code aims to protect children, not 'from' the digital world but rather 'within' it.

When using Zoom, the children are training with other members they may see or come into, contact with under normal class circumstances. RDMA only (Lloyd and Amanda Lewis) are permitted to use the Zoom account used for lessons and it is not accessible by anyone else. RDMA may record Gradings for the purpose of determining individual progress after the event, this is not shared with anyone outside of RDMA management and will be deleted when no longer required for grading.

Members are given strict rules on using Zoom and Facebook before they can access the classes. Facebook is a closed group with access only granted when we are certain who they are. Photos and information are never shared without the permission of the parent and approval by RDMA management. Access and codes are never given without being accompanied by the rules, which are set and sent out to all parents/members as follows:

The first class attended online will serve as confirmation that Parents agree to and will abide by the regulations set out below:

Zoom Specific Rules:

- An adult must be present & visible for students under the age of 16yrs at the beginning of the Zoom class.
- Please ensure the name visible on your Zoom screen is the name we have on record i.e. parent or child's name.
- Do not share the Zoom meeting ID or passcode with anyone else, this puts yourself and other members in danger and the class will be terminated if unknown viewers access the session.
- Students will be admitted to classes via the 'Waiting Room'. Only students enrolled in the classes will be accepted via the Zoom stream.
- A register will be taken at the beginning of each class.
- All students must keep 'Video' mode on during classes.
- All students' microphones will be 'muted' on entrance to each class. Sensei may ask students to unmute their microphones at appropriate times during classes
- Should Sensei have any concerns about the safety of students during classes, the class will end immediately and we will make telephone contact with parents.
- Students must be in appropriate Red Dragons Gi (RD T-shirt with Gi Trousers is fine) during classes.

Zoom and Facebook Group Specific Rules:

- Parents of students in Teeny/Tiny Titans classes (- 6 years) are expected to remain in the room for the duration of the class.
- Students must undertake classes in a communal area of their home.
- The School will not accept responsibility for any injuries incurred during online classes.
- The School will not accept responsibility for any damages to property within the students' home during online classes.

It is the responsibility of the parent to ensure that children are kept safe during classes via Zoom and Facebook and should apply general on-line safeguarding principles during this time. For further information we point them towards the following website: [Thinkuknow - homewww.thinkuknow.co.uk](http://homewww.thinkuknow.co.uk)

It is also our responsibility as an ethical business to ensure children are protected from inappropriate and unfair content whilst attending our classes; we do not air advertising on these platforms and we are committed to using appropriate, respectful language at all times. We are committed to an environment of respect; we have a zero tolerance toward bad language, prejudice or discrimination of any kind in our dojo or online dojo. On Zoom we are able to control who come in and out of the class and would not hesitate to block anyone we did not recognize or who does not adhere to this or the above rules.

Our Martial Arts online training offers a transparent and protected place for the child where we can be heard by the parents/carers, who are asked to stay in close proximity to the child. We ensure that the parent/carer is the one who accesses the classes for the child by using them as point of contact with all communications and recipient of access codes. We consider the best interests of the child when it comes to their data, we only use first names in our communications as per the name they also provide willingly on the screen, this would happen in a class ordinarily, all other data is safely retained. We implement high privacy settings on our Zoom account and Facebook group/pages.

9. Retention of records

Should you/your child leave the school we will ask if you would like us to remain in contact, for example, to communicate promotions and details of courses, you will be given the option to opt out from this and any records or data we have on you would be destroyed or deleted. Photographs that have already appeared on the club's social media would still remain from your prior consent and it would be your responsibility to notify us of specific photos any that you would like delete or edit you/your child from.

10. Consent

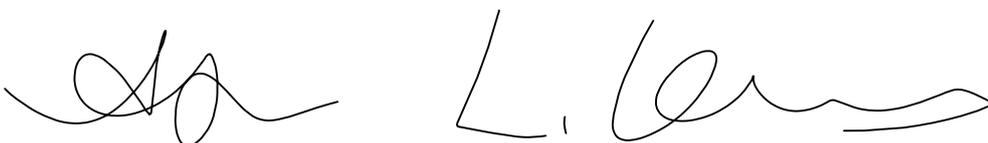
Prospects and Members: The lawful basis for processing data for these members is set out in this policy and the Privacy Notice, contact details have been provided to us for the purpose of personal interest in RDMA and as such consent is already in place for these members.

Not Interested and Lapsed members: When a member leaves or a prospect decides not to join, we will make the change to the CRM system and in turn our data processor MAT shall remove the communications preferences flags from the member record.

We hope this helps demonstrate to you the care we take over your personal information, please refer to the Privacy Notice for more information. You are a valued member and we are happy to have you as part of the RDMA school. Please do not hesitate to ask if you have any further questions relating to this, your membership or your information.

Date: 12/09/2018 Updated 28/03/2020, 21/08/2020 (COVID amendments) 11/09/2020, 12/03/2021 addition of children's code.

Signed: Mr & Mrs Lloyd Lewis

The image shows two handwritten signatures in black ink. The signature on the left is a stylized, cursive signature, likely belonging to Mrs Lloyd Lewis. The signature on the right is a more formal, blocky signature, likely belonging to Mr Lloyd Lewis.