

TRAINING CAVE



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Approved By	Jack Sunderland Director Training Cave Club Ltd

1. Purpose

Training Cave Club Ltd respects the privacy and information rights of learners, gym members, parents and carers, staff, volunteers, contractors, visitors and professional contacts. We will process personal information only where there is a clear purpose and lawful basis, use no more than is necessary, protect it appropriately and retain it only for as long as required.

This policy sets the organisation's standards for collecting, using, recording, sharing, storing and disposing of personal information. It is an internal governance policy and does not replace the privacy notices that must explain specific processing to individuals.

2. Scope and Data Protection Roles

This policy applies to personal information held electronically, on paper, in photographs, audio or video, and within communication, membership, education, safeguarding, payroll, finance and qualification systems. It applies to directors, employees, coaches, tutors, assessors, volunteers, contractors and anyone processing information for Training Cave.

Training Cave is a data controller for information it determines how and why to use, including gym membership, staffing, finance and its own operational records. For commissioned alternative provision, Training Cave's role may be an independent controller, joint controller or processor depending on the actual arrangement. The contract or data-sharing arrangement must identify the parties' roles, instructions, lawful basis, security, retention, rights handling and breach notification responsibilities; staff must not assume that the commissioning school or local authority is the sole controller.

3. Legal and Regulatory Framework

This policy has regard to:

- The UK General Data Protection Regulation (UK GDPR);
- The Data Protection Act 2018, as amended;
- The Data (Use and Access) Act 2025;
- The Privacy and Electronic Communications Regulations 2003 where electronic marketing, cookies or similar technologies are used;
- The common law duty of confidentiality where applicable; and
- Information Commissioner's Office guidance and relevant safeguarding, employment, tax, qualification and contractual requirements.

4. Data Protection Principles

Training Cave will ensure that personal information is:

- Processed lawfully, fairly and transparently;
- Collected for specified, explicit and legitimate purposes and not used incompatibly with those purposes;
- Adequate, relevant and limited to what is necessary; accurate and, where necessary, kept up to date;
- Kept in identifiable form for no longer than necessary;
- Protected by appropriate technical and organisational security; and
- Managed in a way that allows Training Cave to demonstrate compliance and accountability.

5. Information We May Process

Depending on the person's relationship with Training Cave, we may process:

- Identity and contact information, dates of birth, emergency contacts and communication preferences;
- Membership, booking, attendance, timetable, participation and payment information;
- Alternative provision referrals, placement agreements, risk assessments, progress, engagement, behaviour, incident and review records;
- Education, qualification, assessment, internal quality assurance and awarding-organisation information;
- Health, disability, SEND, dietary, accessibility, safeguarding and welfare information where necessary;
- Staff and volunteer recruitment, identity, right-to-work, qualifications, training, performance, absence, payroll, pension and payment information;
- DBS and other criminal-offence information where lawfully required for safeguarding or recruitment;
- Supplier, commissioner and professional contact and contract information;
- Photographs, video or CCTV images where these are lawfully used; and
- Technical, security and audit information generated by authorised systems.

6. Sources of Information

Information may be obtained directly from the individual or from a parent, carer, home school, local authority, commissioner, health or safeguarding professional, awarding organisation, employer, referee, DBS service, payment provider or authorised digital system. Where information is obtained from another source, Training Cave will provide privacy information unless an exemption applies and will take reasonable steps to check accuracy where decisions depend on it.

7. Purposes and Lawful Bases

A lawful basis must be identified and recorded before processing begins. The appropriate basis depends on the purpose and circumstances; one basis does not automatically cover every use.

Lawful basis	Typical use	Important limitation
Contract	Memberships, bookings, commissioned services, employment and supplier arrangements.	Processing must be objectively necessary for the contract or steps requested before it.
Legal obligation	Tax, employment, health and safety, safeguarding or regulatory duties that apply to Training Cave.	The specific legal duty must be identifiable; a general reference to compliance is not enough.
Vital interests	A genuine emergency where processing is necessary to protect life.	This is a narrow emergency basis and not a routine safeguarding basis.
Legitimate interests	Proportionate administration, service improvement, security or fraud prevention.	A legitimate interests assessment must balance necessity against the person's rights, especially for children.
Consent	Optional marketing, promotional images or another genuinely optional use.	Consent must be informed, specific and freely given, recorded and as easy to withdraw as to give.

Training Cave will not rely on public task merely because a school or local authority commissioned the service. Public task will be used where Training Cave can identify a relevant task or official authority in law and has documented why the basis applies.

8. Special Category and Criminal Offence Information

Health, disability, racial or ethnic origin, religion, sexual orientation and certain other sensitive information is special category data. Processing it requires both an Article 6 lawful basis and a separate Article 9 condition. Where the Data Protection Act 2018 requires it, Training Cave will also identify a Schedule 1 condition and maintain an appropriate policy document.

Criminal offence information, including DBS information, will be processed only where there is lawful authority and appropriate safeguards. Access will be strictly limited. Training Cave will normally record the check type, date, certificate number and recruitment decision rather than retaining a certificate copy longer than permitted by the DBS Code of Practice and the retention schedule.

9. Children and Young People

Children merit specific protection. Information and explanations directed to learners will be clear, accessible and appropriate to their age and understanding. Training Cave will consider the child's interests, capacity and rights rather than assuming that all decisions or requests belong to the parent or carer. A parent, carer or authorised representative may act where appropriate, but authority and the child's competence and confidentiality must be considered case by case.

Consent will not be used where the activity is not genuinely optional or where it would be inappropriate because of an imbalance of power. Safeguarding information may be processed or shared without consent when another lawful basis and condition applies and this is necessary and proportionate to protect a child or another person.

10. Transparency and Privacy Information

Training Cave will provide privacy information at or before collection, or within the required period where information comes from another source. Privacy notices will explain the controller's identity and contact details, purposes, lawful bases, categories, recipients, retention, rights, complaints route and any international transfers or automated decision-making. Learner-facing information will use clear, age-appropriate language.

The website privacy notice, staff privacy notice and learner or parent information will be reviewed when processing changes. This policy supports those notices but is not a substitute for them.

11. Data Sharing

Information will be shared only where there is a lawful basis, a clear purpose and the disclosure is necessary and proportionate. Recipients may include home schools, local authorities, commissioners, safeguarding or health services, emergency services, awarding organisations, payroll and pension providers, payment processors, professional advisers and regulators.

- Staff will verify the recipient and use approved secure methods before sending sensitive information.
- Only the minimum necessary information will be shared and the decision will be recorded where appropriate.
- Regular or systematic sharing will be covered by a contract, data-sharing agreement or documented arrangement.
- A safeguarding or emergency disclosure will not be delayed merely because consent has not been obtained where another lawful route applies.
- Training Cave does not sell personal information.

12. Service Providers and International Transfers

Suppliers that process information on Training Cave's behalf will be selected with due diligence and bound by a written data-processing agreement containing the required safeguards. Training Cave will maintain oversight of relevant systems and access. Personal information will not be transferred outside the UK unless a lawful transfer mechanism and appropriate safeguards are in place and the transfer is described in the relevant privacy information.

13. Information Security and Confidentiality

Training Cave will apply security measures proportionate to the sensitivity, volume and risk of the information, including:

- Role-based access, strong unique passwords and multi-factor authentication where available;
- Approved accounts, devices, software and storage locations, with access removed promptly when no longer required;
- Secure storage and controlled access for paper records, keys and portable devices;
- Encryption or secure transfer for sensitive information where appropriate;
- Careful checking of email recipients, attachments and permissions before information is sent;
- Back-up, update, malware protection and recovery arrangements appropriate to the systems used;
- Confidential discussions held where they cannot be overheard and screens or records protected from casual viewing; and
- Secure deletion, shredding or disposal when information reaches the end of its retention period.

Personal accounts, unapproved messaging services, removable media or private devices must not be used for Training Cave information unless expressly authorised and appropriately secured. Confidentiality continues after a person leaves Training Cave.

14. Photographs, Video, Marketing and CCTV

Optional promotional photographs, video and direct marketing will use an appropriate lawful basis and comply with marketing rules. Where consent is relied upon, participation must be optional, the intended use must be clear and withdrawal will apply to future use so far as reasonably possible. Images must not be published with unnecessary identifying or safeguarding information.

If CCTV is operated, Training Cave will define and document its purpose, display suitable signage, restrict access and disclosure, keep footage only for a documented and proportionate period, and respond appropriately to rights requests and law-enforcement disclosures. CCTV will not be used for a new incompatible purpose without assessment and updated privacy information.

15. Retention and Disposal

Training Cave will maintain a retention schedule covering each record category. Retention will be based on the purpose, statutory or contractual requirements, safeguarding needs, limitation periods and the interests of the individual; records will not all be kept for a single blanket period.

- Financial and company accounting records will normally be kept for six years from the end of the relevant financial year, and longer where law or an HMRC matter requires it.
- Alternative provision referral, attendance, progress and placement records will follow the documented commissioner, contractual and organisational retention requirement.
- Safeguarding records will follow safeguarding guidance, local arrangements and any required secure transfer to the home school or responsible body.
- Qualification and assessment records will follow awarding-organisation and regulatory requirements.
- Employment, payroll, pension and recruitment records will follow the applicable employment, tax, pension and limitation requirements.
- DBS, CCTV, unsuccessful enquiry and marketing records will have specific, proportionate periods recorded in the retention schedule.

At the end of the period, information will be securely deleted, destroyed or anonymised unless a documented reason requires a hold, such as an active complaint, safeguarding matter, investigation or legal claim.

16. Individual Rights

Depending on the circumstances and lawful basis, individuals may have rights to be informed, access their information, correct inaccurate information, request erasure or restriction, receive portable information, object to processing and challenge certain solely automated decisions. Some rights are qualified and exemptions may apply; Training Cave will assess each request rather than promise that every request will be granted.

A request does not need to use legal wording or be made on a particular form. Staff must forward any possible rights request immediately to the Data Protection Lead. Identity or authority will be checked proportionately. Training Cave will respond without undue delay and normally within one calendar month, subject to lawful extensions or pauses.

17. Data Protection Complaints

Individuals may complain about how Training Cave has used their information by emailing info@trainingcave.co.uk or writing to the address in section 23. A complaint does not need to mention data protection law. Training Cave will provide a clear route for complaints, acknowledge receipt within 30 days, make appropriate enquiries, keep the complainant informed where necessary and communicate the outcome without undue delay.

The outcome will explain any action taken and the person's right to complain to the Information Commissioner's Office. A data protection complaint may be handled

alongside another complaint process where appropriate, but the specific data protection duties and timescales will still be met.

18. Personal Data Breaches

A personal data breach includes accidental or unlawful loss, destruction, alteration, unauthorised disclosure or access. Staff must report an actual or suspected breach to the Data Protection Lead immediately and must not investigate, conceal or delete evidence without instruction.

Training Cave will contain the incident, preserve evidence, assess the information and people affected, record the facts and decisions, reduce further harm and consider notifications. Where a breach is likely to result in a risk to people's rights and freedoms, Training Cave will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware. Where a high risk is likely, affected individuals will also be informed without undue delay unless an exception applies. All breaches will be logged, including those not reported externally and the reason for that decision.

19. Data Protection by Design and Impact Assessments

Privacy and security will be considered when a new system, service, form, sharing arrangement, monitoring activity or use of information is planned. A data protection impact assessment will be completed before processing that is likely to result in a high risk, particularly where children, vulnerable people, special category information, systematic monitoring or new technology are involved. High-risk processing will not begin until risks have been reduced appropriately and any required ICO consultation has taken place.

20. Accuracy, Access and Record Quality

Staff will record information factually, distinguish observation from opinion, date significant entries and correct errors without obscuring the audit trail. Access will be limited to those who need the information for their role. Safeguarding records will be stored in the designated safeguarding system and not only within general attendance, behaviour or coaching notes.

21. Accountability, Training and Monitoring

Training Cave will maintain proportionate evidence of compliance, including privacy notices, lawful-basis decisions, consent records where used, contracts with processors, information-sharing arrangements, a retention schedule, breach and rights-request logs, training records and data protection impact assessments where required.

Personnel will receive data protection and confidentiality training at induction and refresher training appropriate to their role. Management will review access, incidents, complaints, retention and supplier arrangements and take corrective action where weaknesses are identified.

22 Roles and responsibilities

22.1 Director and Data Protection Lead

- Approve and oversee this policy, privacy notices, retention and supporting procedures.
- Coordinate rights requests, complaints, breaches, impact assessments and ICO contact.
- Ensure responsibilities with commissioners, processors and partners are documented.
- Keep data protection risks, training and compliance under review.

Training Cave does not describe this role as a statutory Data Protection Officer unless the organisation formally determines that appointment is required or chooses to appoint one in accordance with UK GDPR requirements.

22.2 All Personnel

- Use personal information only for authorised work and follow this policy and related procedures.
- Keep information accurate, secure and confidential and share it only through approved routes.
- Report suspected breaches, misdirected communications, lost records or devices and inappropriate access immediately.
- Forward rights requests and data protection complaints promptly and complete required training.

23. Contact and Regulatory Complaints

Data Protection Lead
Training Cave Club Ltd
Unit 20, Carrmills Business Centre
Birstall
WF17 9JX
Email: info@trainingcave.co.uk

Individuals may also complain to the Information Commissioner's Office. Current contact and complaint information is available at www.ico.org.uk. Training Cave encourages concerns to be raised with us first where appropriate so that we can investigate and respond.

24 Related documents and supporting arrangements

This policy is supported, as applicable, by:

- Website, member, learner and staff privacy notices;
- A data retention schedule and secure-disposal arrangements;
- Personal data breach procedure and breach log;
- Individual-rights and data protection complaints procedures and logs;
- Processor contracts, data-sharing agreements and information asset records;
- Consent and image-use records where consent is relied upon;
- CCTV notice and documented arrangements where CCTV is operated;
- Child Protection and Safeguarding Policy; and
- Compliments, Comments and Complaints Policy and relevant IT, confidentiality and records procedures.

25. Policy review

This policy will be reviewed annually and sooner where legislation, ICO guidance, services, systems, sharing arrangements or risks change, or where an incident, complaint or audit identifies a gap. Approval and review dates will be recorded on the policy control page.