



BREAKTHROUGH GRAPPLING CIC:

General Data Protection Regulation (GDPR) Guidelines and Procedures

This policy was agreed on by the directors: 6/1/26

This policy will be reviewed: 1/1/27

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1. Purpose & Scope

This policy sets out how Breakthrough Grappling CIC processes personal data in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. It applies to all personal data processed by the organisation, including information relating to service users, participants, parents/carers, staff, volunteers, partners, and third parties, covering both digital and paper records created through the delivery of our services.

Breakthrough Grappling CIC collects and uses personal data for the delivery of Brazilian Jiu-Jitsu sessions, mentoring activities, workshops, and associated organisational functions. All processing will be conducted lawfully, fairly, and transparently, and only where a clear and justifiable lawful basis exists.

The policy covers:

- The data we collect and how it is used
- The lawful basis for processing and storage
- Our responsibilities for security and confidentiality
- Individuals' rights regarding their personal information

2. Legal Basis for Processing Personal Data

Breakthrough Grappling CIC processes personal data only where a lawful basis exists under UK GDPR:

- **Consent (Article 6(1)(a))** — clear permission given by the individual
- **Contract (Article 6(1)(b))** — necessary for service delivery
- **Legal Obligation (Article 6(1)(c))** — safeguarding, reporting, statutory compliance
- **Vital Interests (Article 6(1)(d))** — protecting life or safety
- **Legitimate Interests (Article 6(1)(f))** — supporting operations without disproportionately affecting individual rights

For **special category data** (e.g., health or trauma-related information), processing relies on:

- **Explicit Consent (Article 9(2)(a))**
- **Vital Interests (Article 9(2)(c))**
- **Safeguarding / Social Protection (Article 9(2)(b)/(g))**, where legally appropriate

Breakthrough Grappling CIC does not undertake automated decision-making or profiling and does not transfer personal data outside the UK without a lawful basis.

3. What Data We Collect and Why

Data Type	Purpose / Use	Lawful Basis
Contact details & emergency contacts	Communication, participation management, emergency response	Legitimate Interests
Attendance / session registers	Service delivery, safeguarding, capacity monitoring	Legitimate Interests
Consent forms	Confirm participation, gather necessary health info	Consent
Feedback forms / surveys	Service evaluation, improvement, funder reporting	Legitimate Interests / Consent
Photos / video	Promotion, reporting	Consent
Accident / incident records	Safeguarding, legal compliance	Legal Obligation
Health / medical information	Safe participation, reasonable adjustments, emergency care	Explicit Consent / Vital Interests
DBS checks (staff/volunteers)	Safer recruitment, safeguarding	Legal Obligation
Referral / risk information	Safety, safeguarding, support	Legitimate Interests / Vital Interests

4. Data Storage & Retention

4.1 Storage & Security

Data is stored securely using password-protected digital systems and secure physical storage. Access is restricted to authorised staff and volunteers. Security measures include:

- Password protection and role-based access
- Two-factor authentication where available
- Secure disposal of data no longer required
- These measures support compliance with UK GDPR Articles 5(1)(f) and 32 regarding integrity, confidentiality, and security of data.

4.2 Retention Periods

Personal data is retained only as long as necessary to fulfil its purpose or meet legal obligations. Typically, **2–3 years** after last contact; safeguarding or accident records for minors may be kept longer (up to 7 years or until the individual is 21).

A more detailed internal retention schedule is maintained and available on request.

4.3 Secure Disposal

When data is no longer needed, it will be securely deleted or destroyed in the following manner:

- Digital data: permanently deleted from systems and backups

- Paper records: shredded or securely destroyed
- Images/videos: removed from use if consent withdrawn (where reasonably practical)

4.4 Data Breaches

All breaches are assessed and recorded. If a breach risks individual rights, the **ICO** and affected individuals are notified within 72 hours, in line with GDPR Articles 33 & 34.

5. Sharing Data

Data is only shared when necessary, lawful, and appropriate. This includes to:

- **Safeguarding partners** (Social Care, Police) where there are concerns about harm or abuse
- **Emergency services** if required to protect someone's vital interests
- **Venue providers**, only where necessary for health and safety or access needs
- **Partner organisations**, when delivering joint programmes or referrals (with consent where appropriate)
- **Service providers** acting on our behalf, under data processing agreements

Where sharing is not legally required, we will seek the individual's consent before sharing data and can it be withdrawn at any time. This includes sharing information with:

- partner organisations for onward support
- external instructors or programme collaborators
- schools, colleges or referring agencies

We do not routinely transfer data outside the UK.

6. Your Data Rights

Under UK GDPR, individuals have rights to:

- **Be informed** — know how your data is used
- **Access** — request a copy of your personal data we hold
- **Rectification** — correct inaccurate or incomplete data
- **Erasure** — request deletion of your data, where applicable
- **Restrict processing** — limit how your data is used
- **Data portability** — request a copy of your data in a structured, commonly used format
- **Object** — to certain types of processing (e.g., marketing)
- **Automated decision-making / profiling** — not currently used by Breakthrough Grappling CIC

Children & vulnerable adults: Parents/guardians may act on behalf of children under 18. For adults at risk, requests are considered case-by-case in the individual's best interests.

How to request: Contact Kyle Brown, the Data Protection Lead by emailing:
hello@breakthroughgrappling.com

Requests are responded to within **one month**. Exceptions may apply if requests are clearly unfounded, excessive, or repetitive.

7. Governance & Policy Review

Breakthrough Grappling CIC ensures ongoing compliance:

- **Review:** annually, or sooner if legislation, guidance, or practice changes
- **Responsibilities:**
 - Data Protection Lead (Kyle Brown) maintains policy, monitors compliance, and updates as needed
 - Staff/volunteers must follow policy and report breaches immediately
- **Record-keeping:** Reviews, updates, and major incidents are documented internally for transparency and audit purposes

8. Contact & Complaints

Data Protection Lead: Kyle Brown, Breakthrough Grappling CIC
hello@breakthroughgrappling.com

If dissatisfied with data processing, individuals may contact the ICO:

www.ico.org.uk | 0303 123 1113

This policy is publicly available and may be shared with participants, parents/carers, partners, and funders on request.