

E.S.K.U



England Shotokan Karate Union

Data Protection Policy

Governing Body: IMASA

Last Review Date: 18/01/2026

Next Review Due: 18/01/2027

1. Purpose

The England Shotokan Karate Union (ESKU) is committed to protecting the personal data and privacy of its members, volunteers, instructors, officials, parents, and all other individuals it engages with. This policy explains how ESKU collects, uses, stores, and protects personal data in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

2. Scope

This policy applies to: - All ESKU officers, instructors, coaches, officials, and volunteers - All affiliated clubs and their officers - All personal data processed by ESKU, whether in paper or electronic form

3. Data Controller

For the purposes of data protection law:

- **Data Controller:** England Shotokan Karate Union (ESKU)
- **Designated Safeguarding Lead (DSL):** George Bussey

Overall responsibility for data protection compliance sits with the ESKU Executive Committee.

4. Personal Data We Collect

ESKU may collect and process the following types of personal data:

- Names, addresses, email addresses, telephone numbers

- Date of birth and age category
 - Membership and licence information
 - Grading and competition records
 - Safeguarding and disciplinary records
 - Emergency contact details
 - Medical information (only where necessary and with appropriate safeguards)
 - DBS / safeguarding clearance information (where applicable)
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5. Special Category Data

Some data is classified as **special category data**, including: - Health or medical information - Safeguarding concerns or allegations - Criminal record information (e.g. DBS checks)

This data will only be processed where: - It is strictly necessary - There is a lawful basis under UK GDPR - Appropriate security and confidentiality measures are in place

6. Lawful Basis for Processing

ESKU processes personal data under one or more of the following lawful bases:

- **Consent** – where individuals have given clear permission
 - **Contract** – to fulfil membership or licence obligations
 - **Legal obligation** – to comply with safeguarding or regulatory duties
 - **Vital interests** – to protect someone’s life or welfare
 - **Legitimate interests** – where ESKU’s interests do not override individual rights
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7. How We Use Personal Data

Personal data is used only for legitimate ESKU purposes, including: - Managing membership and licensing - Organising training, gradings, events, and competitions - Communicating with members and clubs - Safeguarding children and adults at risk - Meeting legal and insurance requirements - Maintaining accurate historical records

8. Data Sharing

ESKU will only share personal data when necessary and appropriate, including with: - IMASA (as the governing body) - Affiliated clubs (on a need-to-know basis) - Safeguarding authorities (local authority, police) - Insurers or legal advisors

Data will never be sold or shared for marketing purposes.

9. Data Storage and Security

ESKU takes appropriate technical and organisational measures to protect personal data, including: - Secure digital storage with password protection - Limited access to authorised officers only - Secure storage of paper records - Encryption or secure transfer where possible

Personal data will be retained only for as long as necessary.

10. Data Retention

ESKU retains data in line with its retention requirements:

- Membership records: Duration of membership + up to 6 years
- Financial records: 7 years
- Safeguarding and disciplinary records: As required by law and safeguarding guidance
- DBS information: In line with DBS Code of Practice
- Accident/Injury Reports; Adults – Keep for 6 years (or 3 years after the last entry) for insurance/legal claims; Children – Keep until the child is 18, plus 3 years, or 6 years after the age of 18, for ease of record-keeping.

Data no longer required will be securely deleted or destroyed.

11. Individual Rights

Under UK GDPR, individuals have the right to: - Access their personal data - Request correction of inaccurate data - Request deletion (where applicable) - Restrict or object to processing - Request data portability - Withdraw consent at any time

Requests should be made in writing to ESKU and will be responded to within statutory timeframes.

12. Data Breaches

Any actual or suspected data breach must be reported immediately to the ESKU Executive Committee.

Where required, ESKU will: - Investigate the breach - Take steps to mitigate harm - Report to the Information Commissioner's Office (ICO) - Inform affected individuals where appropriate

13. Responsibilities

All ESKU officers, instructors, and volunteers must: - Follow this policy - Handle personal data responsibly - Report concerns or breaches promptly

Failure to comply may result in disciplinary action.

14. Policy Review

This policy will be reviewed annually or following any significant change in legislation or ESKU operations.

This policy should be read alongside the ESKU Safeguarding Policy, Disciplinary Policy, and IMASA regulations.