

CLIENT POLICY

Cookie Consent Management Policy

Internal governance and operating policy

Version: 1.1

Effective date: 3 August 2026

Contact: startup@firefighterperformance.co.uk

At a glance

START UP Firefighter Performance will obtain and respect valid visitor consent before using non-essential cookies or similar technologies. The website will provide a genuine choice, keep optional categories off by default, make refusal as accessible as acceptance, and allow consent to be changed or withdrawn at any time.

This is an internal governance document. It explains how the consent system is configured, tested, evidenced and changed. It is not the public Cookie Policy and should not be used as the visitor-facing explanation of individual services or cookies.

This version supersedes Cookie Consent Management Policy Version 1.0 dated 3 August 2026. It reflects the live Usercentrics for Wix banner and the implementation test completed on 3 August 2026.

1. Purpose and objectives

The objectives of this policy are to:

- maintain a consent mechanism that meets applicable UK privacy and electronic communications requirements;
- prevent optional technologies from operating before the relevant consent is given;
- ensure the public Cookie Policy accurately reflects the live website;
- keep evidence of consent, configuration, testing and material changes;
- define approval and testing requirements before a new website technology is activated; and

- provide a clear response process for complaints, errors and consent failures.

2. Scope and exclusions

This policy applies to firefighterperformance.co.uk, its Wix pages, the live Usercentrics for Wix consent platform, and every visitor-facing script, tag, pixel, widget, embed, software development kit, browser-storage item or similar technology that may store information on, or access information from, a visitor's device.

The policy applies whether a technology is installed through Wix, custom code, an app, a marketing integration, a third-party widget or a provider-controlled update.

The Facebook Business Verification entry currently contains only a facebook-domain-verification meta tag. It verifies control of the domain and does not itself store or access information on a visitor's device. It is therefore outside the consent categories unless its implementation changes.

The Wix ChatGPT/AI search tool is currently an administrator-side Wix tool rather than a visitor-facing website technology. It is outside this policy unless it later adds public code, an embedded assistant, tracking or browser storage to the live site.

3. Legal and governance principles

The Privacy and Electronic Communications Regulations 2003 generally require consent before information is stored on, or accessed from, a user's device unless a narrow exception applies. Where a technology also processes personal data, the UK GDPR and Data Protection Act 2018 apply to that processing.

The following controls are mandatory:

- Essential classification is used only where a technology is strictly necessary for a requested service, communications transmission, security or the consent mechanism itself.
- Functional, Analytical and Marketing controls remain off until the visitor actively chooses them.
- Consent must be freely given, specific, informed and unambiguous, and must be indicated by a clear positive action.
- Closing or ignoring the banner is not treated as consent.
- The visitor can deny all optional categories without losing access to the core website.

- Withdrawing consent must be as easy as giving it and must take effect for later use of the affected services.
- The wording, categories, service declarations and public policy must not be misleading or materially incomplete.
- A service must not be activated merely because its provider describes it as cookieless; storage, access, device information, IP addresses and similar identifiers must still be assessed.

4. Roles and responsibilities

Role	Current holder	Responsibilities
Policy owner, website administrator and data controller	Jack Burman	Approves technologies and categories; maintains Wix and Usercentrics; updates the public Cookie Policy; conducts or commissions testing; handles consent evidence, complaints and incidents; completes reviews.
Technology providers	Wix, Usercentrics, Google and any approved widget provider	Provide the technical service and supporting information. Provider documentation supports, but does not replace, the owner's assessment and testing.
External adviser or tester	If appointed	Works only within documented instructions and reports findings to the policy owner. Approval remains with the policy owner.

Only Jack Burman is currently authorised to change the Wix custom-code categories, Usercentrics configuration, public Cookie Policy or consent records. If access is delegated later, it must be limited to what is necessary and removed when no longer required.

5. Live consent configuration

The legacy Wix banner is disabled. The live consent mechanism is Usercentrics for Wix on the free plan. The plan level does not reduce the controls required by this policy.

Control	Required live position
Primary actions	Accept All, Deny and Save Settings are displayed.

Optional defaults	Functional, Analytical and Marketing are off by default.
Essential control	Displayed as required and not capable of being disabled by the visitor.
Granular choice	The visitor can enable or disable each optional category separately.
Ongoing access	A permanent Privacy Settings trigger remains available after a choice is saved.
Policy access	The banner or detailed settings must link clearly to the current public Cookie Policy.
Consent record	Choices are saved in the Wix consent database and can be exported from the Consent Log.

5.1 Live category and service map

Live category	Declared service	Current status and rule
Essential	WIX	Active where required for core page delivery, security and platform operation.
Essential	Usercentrics for Wix	Active to display the consent interface, store preferences and support the permanent settings trigger.
Functional	No declared service	Switch remains available but currently enables no approved service.
Analytical	No declared service	Switch remains available but currently enables no approved service.
Marketing	Google Tag Services	Controls Google Analytics measurement and Google advertising/AdSense resources under the present unified configuration. Must remain off until Marketing consent.

Important current limitation: Google Analytics is not controlled by the Analytical switch. The measurement tag G-GH3WZCKM60 loads only when Marketing is enabled because it is part of the same Google Tag Services entry as Google advertising. The public Cookie Policy and internal records must describe this actual behaviour unless the implementation is reconfigured and retested.

6. Approved technology register

Technology	Approved classification	Status	Conditions
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Wix CMS and core Wix services	Essential	Active	Use only the Wix elements reasonably required to operate and protect the site.
Usercentrics for Wix	Essential	Active	Must remain available before choice and after choice through the permanent settings trigger.
Google Tag Services	Marketing	Active after consent	Current entry includes Google Ads, DoubleClick Ad and Conversion Linker functions and also gates the connected Google Analytics tag.
Google Analytics G-GH3WZCKM60	Marketing under current setup	Active after Marketing consent	Do not describe as controlled by Analytical unless it is separated, declared and successfully retested.
Google AdSense Auto Ads; publisher ca-pub-6957084581307923	Marketing	Approved for activation	May load only after Marketing consent. Google's current publisher and consent requirements must be checked before launch and after material configuration changes.
Trustmary review/testimonial widget	Analytical when activated	Approved, but not currently detected on tested public pages	Before activation, add or verify a declared Trustmary service under Analytical, ensure it is blocked before consent, update the public Cookie Policy and complete the full test sequence.
Facebook domain-verification meta tag	Outside consent scope	Active verification metadata	Reassess before adding a Meta Pixel, social plug-in, login or other visitor-facing Meta technology.
Wix ChatGPT/AI search tool	Outside visitor consent scope	Administrator-side tool	Reassess if it adds live visitor-facing code, content generation based on visitor data, an embedded assistant or browser storage.

7. Technology approval and change control

No new or materially changed technology may be published until the policy owner has completed and recorded the following steps:

- Identify the provider, feature, domains, scripts, storage items, purposes, personal data, recipients and expected retention.

- Decide whether the technology is genuinely essential or requires Functional, Analytical or Marketing consent. Record the reason.
- Check the provider's current privacy, cookie, data-processing, international-transfer and consent documentation.
- Configure the Wix custom code, app or integration so it follows the approved Usercentrics category.
- Add or update the service declaration in Usercentrics, including an accurate service name, purpose, provider and policy link where the interface permits.
- Update the public Cookie Policy before or at the same time as activation.
- Complete the testing standard in section 8 and retain the evidence.
- Approve the change and record its date in the change log.

A provider update, Wix integration change, altered tag identifier, new advertising feature, added page embed or change in purpose is treated as a change even where the service name remains the same.

8. Testing and verification standard

Testing must use a fresh private/incognito session or a clean browser profile. Existing site data and previous consent must be cleared where necessary. Tests should cover representative desktop and mobile pages, including the home page, policy pages, contact or sign-up pages, and every page containing an optional widget or advert.

Test	Expected result
Before any choice	Only essential Wix and Usercentrics activity. No optional Google, advertising, analytics or widget storage/access.
Deny	All optional categories remain off. Core site remains usable. Optional resources remain blocked after refresh and navigation.
Functional only	Only declared Functional services load. At present, no optional service should load.
Analytical only	Only declared Analytical services load. At present, no service should load until Trustmary or another service is correctly declared.
Marketing only	The approved Google Tag Services resources may load, including the currently unified Analytics and advertising functions. No undeclared optional provider should load.
Accept All	Every declared optional service may load; the saved state remains after refresh.

Withdrawal	After all optional categories are switched off and settings are saved, affected services stop loading on later page loads. Note any previously stored items that remain until deletion or expiry.
Interface and access	Deny is as easy to find and use as Accept All; switches are off by default; wording is clear; settings remain available; keyboard and mobile use are practical.

8.9 Technical evidence required

A page scan or inspection of script and iframe URLs is useful but is not, by itself, a complete consent audit. The policy owner must also use browser developer tools or an equivalent testing method to inspect:

- cookies and their domains, values where safe to view, categories and expiry dates;
- local storage, session storage, IndexedDB and other browser storage;
- network requests made before choice and after each relevant choice;
- scripts, iframes, pixels and tag-manager or consent-mode signals;
- behaviour after refresh, navigation and withdrawal; and
- the services and descriptions displayed in the live Usercentrics panel.

Retained evidence should include the date, tester, browser/device, pages tested, consent scenario, screenshots or exports, observed domains/storage, result, defects, corrective action and retest outcome. A failed material test requires the affected optional technology to be disabled until corrected or otherwise contained.

9. Consent records and retention

The Wix consent log is the primary consent record. Access is restricted to the policy owner. The log may be exported when needed to investigate a complaint, answer a regulatory request, evidence a particular decision or conduct an audit.

For each material banner configuration or policy version, retain:

- the banner wording and available buttons;
- the category defaults and declared-service list;
- the current public Cookie Policy and its version/effective date;
- the technology register and approval record;
- test evidence and corrective actions; and

- any consent-log extract necessary to address the matter for which it was exported.

Consent-log exports must be stored securely, shared only where necessary and deleted no later than 24 months after export unless an unresolved complaint, legal claim, regulatory enquiry or other documented need requires longer retention. The reason and review date for any extended retention must be recorded. The primary Wix record remains subject to the platform's applicable retention and account controls.

Consent evidence must not be used for advertising, profiling or an unrelated purpose. Identifiers in the log must not be matched to named individuals unless necessary to answer a legitimate request or dispute and legally permitted.

10. Withdrawal, renewal and material changes

Visitors can change or withdraw consent through the permanent Privacy Settings trigger. Withdrawal applies prospectively. The website must stop activating the affected optional services on later page loads; the public Cookie Policy should explain that previously stored items may remain until expiry or manual deletion.

The consent request will be presented again at least every six months. The next planned refresh date is 3 February 2027. Consent must be requested again sooner where a new purpose or materially different service is introduced, the categories or providers materially change, the earlier consent cannot reasonably cover the change, the consent record is lost, or a legal or provider requirement makes renewal appropriate.

Routine wording corrections that do not change the purposes or choices do not automatically invalidate existing consent, but the public documentation and retained configuration record must still be updated.

11. Complaints, incidents and corrective action

Questions or complaints about website consent must be sent to startup@firefighterperformance.co.uk and handled promptly by the policy owner. The response record should include the issue, relevant consent evidence, investigation, outcome and any correction made.

A consent incident includes:

- an optional service loading before the relevant choice;
- an optional switch being pre-enabled;
- Deny or withdrawal not working as described;
- a material service or purpose being absent from the banner or public Cookie Policy;
- a service being placed in Essential without a defensible strict-necessity reason; or
- loss, unauthorised disclosure or inappropriate use of consent-log information.

Where practical, the affected optional technology must be disabled or blocked while a material incident is investigated. The policy owner must assess whether the issue is also a personal-data breach, whether affected information or consent needs correction, whether visitors should be asked again, and whether advice or notification is required. Corrective action must be retested and recorded before closure.

12. Review, approval and document control

This policy will be reviewed whenever website technologies, purposes, providers, category assignments, the consent platform, relevant law or regulatory guidance materially change, and at least annually. The next scheduled annual review is 3 August 2027.

Document field	Current value
Policy owner	Jack Burman, sole trader trading as START UP Firefighter Performance
Version	1.1
Effective date	3 August 2026
Next consent refresh	3 February 2027, or earlier after a material change
Next policy review	3 August 2027, or earlier after a material change
Supersedes	Cookie Consent Management Policy Version 1.0 dated 3 August 2026

12.1 Approval record

Approval field	Record
Approved by	Jack Burman

Approval date	03/08/2026
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Appendix A — Live implementation test record

Field	Recorded result
Test date	3 August 2026
Website and pages	firefighterperformance.co.uk: home, About, Firefighter Coaching, FFPC, Policies, Contact Us and Mailing List pages.
Consent platform	Usercentrics for Wix live; legacy Wix banner disabled.
Initial state	Essential enabled; Functional, Analytical and Marketing off. Accept All, Deny and Save Settings displayed.
Declared services	Essential: WIX and Usercentrics for Wix. Marketing: Google Tag Services. No declared Functional or Analytical service.
Before choice and after Deny	No Google Tag Manager/Google Analytics, AdSense/DoubleClick or Trustmary script, iframe, image or link resource URL was observed in the inspected page DOM.
Analytical only	No Google or Trustmary resource was observed. The Analytical category currently has no declared service.
Marketing only	Google gtag for measurement ID G-GH3WZCKM60 and Google advertising/AdSense resources loaded.
Accept All	Google gtag, AdSense publisher ca-pub-6957084581307923, Funding Choices and advertising-quality resources loaded. Trustmary did not load on the tested public pages.
Withdrawal	After all optional categories were switched off and settings saved, Google and Trustmary resource URLs were absent on reload.
Permanent trigger	Privacy Settings remained available and reopened the consent controls.
Test limitation	This inspection verified declared services, consent states and page-DOM resource URLs. It did not constitute a complete developer-tools audit of cookies, local storage, IndexedDB and all network requests.

Appendix B — Required implementation actions

Priority	Action	Completion evidence
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Before replacing the public policy	Correct the public Cookie Policy to use the live labels Analytical and Marketing and to explain that Google Analytics currently follows Marketing through Google Tag Services.	Published Version 1.1 or later and banner link verified.
Before Trustmary activation	Declare Trustmary under Analytical, verify its provider information, block it before consent, update the public Cookie Policy and complete the full test sequence.	Usercentrics service entry, policy revision and passing test record.
Before or with AdSense activation	Confirm firefighterperformance.co.uk is added and approved where required in AdSense, confirm current Google consent/publisher requirements, and verify that advertising remains blocked until Marketing consent.	AdSense status record and passing Marketing/Deny/withdrawal tests.
Promptly	Complete a full developer-tools cookie, storage and network audit for each consent scenario and record the results.	Dated technical test record.
By 3 February 2027	Configure or manually initiate the six-month consent refresh and verify that a fresh choice is requested.	Screenshot and test note.
When publishing this version	Replace the published Version 1.0 management policy on the Policies page with this approved version.	Live Policies page checked.

Appendix C — Change log

Version	Date	Summary	Approved by
1.0	3 August 2026	Initial policy. Superseded because it described the legacy banner and technologies not used by the website.	Jack Burman
1.1	3 August 2026	Rewritten for Usercentrics for Wix; corrected live categories and Google mapping; added testing, retention, incident and change-control requirements.	Pending signature

Authoritative references

These sources support the legal and platform controls in this policy. They should be rechecked during material changes and the annual review.

- [ICO: What are the PECR rules?](#)
- [ICO: What are the exceptions?](#)
- [ICO: How do we manage consent in practice?](#)
- [Wix: Displaying a cookie banner on your site](#)
- [Wix: Managing your site's consent log](#)
- [Wix: Cookies and your Wix site](#)
- [Google: Consent management requirements for publishers](#)