



## BBTSA GENERAL DATA PROTECTION POLICY

### Statement

- GDPR stands for General Data Protection Regulation and replaces the previous Data Protection directives that were in place. It was approved by the EU Parliament in 2016 and comes into effect on 25th May 2018.
- GDPR states that personal data should be 'processed fairly & lawfully' and collected for specified, explicit and legitimate purposes' and that individuals data is not processed without their knowledge and are only processed with their 'explicit' consent.
- GDPR covers personal data relating to individuals. The BBTSA is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents', volunteers' and professional members' personal data.
- The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

### GDPR includes 7 rights for individuals

#### 1) The right to be informed

- The BBTSA and BBTSA Clubs are registered providers and as so, are required to collect and manage certain data. We need to know parent's names, addresses, telephone numbers, email addresses.
- We need to know children's full names, addresses, dates of birth, along with any medical, SEN requirements.
- If children/athletes are entering festivals or competitions, we are also required to provide data of competitors to festival/competition organisers.
- The BBTSA / BBTSA clubs are required to hold data on its coaches and volunteers; names, addresses, email addresses, telephone numbers, dates of birth. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK.
- DBS Numbers and date of issue are also held on a central record.

#### 2) The right of access

- At any point an individual can make a request relating to their data and the BBTSA will need to provide a response (within 1 month).
- The BBTSA can refuse a request, if we have a lawful obligation to retain data but we will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision.

#### 3) The right to erasure

- You have the right to request the deletion of your data where there is no compelling reason for its continued use. However, the BBTSA has a legal duty to keep children's and parent's details for a reasonable time.
- The BBTSA retain these records for 3 years after leaving, children's accident and injury records for 19 years (or until the child reaches 21 years), and 22 years (or until the child reaches 24 years) for Child Protection records.
- Professional member's records must be kept for 6 years after the member leaves the BBTSA, before they can be erased. This data is archived securely and shredded after the legal retention period or stored electronically on devices with security password protection.



#### 4) The right to restrict processing

- Parents, volunteers and professional members can object to the BBTSA processing their data. This means that records can be stored but must not be used in anyway, for example reports or for communications.

#### 5) The right to data portability

- The BBTSA requires data to be transferred from one IT system to another, such as from Individual Clubs to the National organisation.

#### 6) The right to object

- Parents, volunteers and professional members can object to their data being used for certain activities like marketing or research.

#### 7) The right not to be subject to automated decision-making including profiling.

- Automated decisions and profiling are used for marketing based organisations. The BBTSA does not use personal data for such purposes.

### **Photography**

As an association, we encourage the promotion of our sport through social media and mass media as well as sharing our events and achievements amongst friends and family.

Photography and videoing are integral in helping us remember the experiences alongside representing baton twirling to the general public. Therefore, at many competitions and events there will be not only professional photographers, but also supporters and potentially the media. We endeavour to ensure privacy and anonymity of the athletes is respected. To do this, we keep a record within our clubs of athletes that do not give permission for their pictures to be taken or used for promotional purposes.

A parent must sign for any athlete under eighteen years old. Alongside this, GDPR regulations state that any child over the age of 13 must also sign to give their permission for photographs to be used. This can be retracted at any point by letting the Club Safeguarding Officer aware, however, any previous photographs or videos used cannot necessarily be removed.

If you **do not give permission**, it will be the athlete's and parent/guardian/carer's responsibility to ensure the athlete avoids the photographers – especially those who are taking photographs/videos for media and promotional purposes.

Some examples of media that photographs and videos may be used are as follows:

- Newspapers
- Magazines
- BBTSA Instagram
- BBTSA Twitter
- BBTSA facebook
- BBTSA website
- Club websites/social media forums



Questions and queries should be directed to the club's Safeguarding Officer.

## Storage and use of personal information

- The BBTSA only holds personal details (full names, date of birth, email addresses) for membership purposes. This data may need to be shared with third parties for the purpose of competition entry forms with permission from the parent/professional member/volunteer obtained.
- All paper copies of children's and professional member's/volunteer's records are kept in a locked office.
- Professional members/volunteers can have access to these files but information taken from the files about individual children is confidential and apart from archiving, these records remain on site at all times. These records are shredded after the retention period.
- Information is gathered via and stored electronically on GDPR compliant software.
- The BBTSA stores personal data held visually in photographs or video clips or as sound recordings. These will only be published if consent has been obtained via the Photo/Video release form.
- Access to BBTSA computers and mobile devices are password protected.
- When the related senior BBTSA professional member leaves their post, these passwords are changed in line with this policy
- GDPR means that the BBTSA must;
  - Manage and process personal data properly
  - [Protect the individual's rights to privacy](#)
  - Provide an individual with access to all personal information held on them

Enquiries / Complaints regarding the storage or processing of data must be directed to our Data Protection Officer.

DPO (Data Protection Officer): Michelle  
Beech DPO email: [michelle@bbtsa.co.uk](mailto:michelle@bbtsa.co.uk)

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