

# Privacy Statement

The City of Birmingham Gymnastics Club is the Performance element of Birmingham City Council's Gymnastics Development Programme at the Gymnastics & Martial Arts Centre (GMAC); as such all member data is processed through Birmingham City Council. The city of Birmingham Gymnastics Club is also registered with British Gymnastics, the governing body, who also provide insurance for clubs and individual members. Further, it is a condition of British Gymnastics club registration that all of its members are individually registered with them.

## Overview

As a local authority Birmingham City Council (*the Council*) collects, holds and processes a considerable amount of information, including personal data about its citizens and other website visitors which allows it to provide a more effective service.

The Council understands that your personal data is important to you and that it has a responsibility to you regarding the information it holds about you in ensuring that the information it collects and uses is done so proportionately, correctly and safely.

Being transparent with you and providing accessible information about how we use your information demonstrates its commitment to the General Data Protection Regulations, hereafter referred to as 'GDPR'. (Regulation (EU) 2016/679).

The Council is committed to safeguarding your privacy and in this policy explains how it will handle your personal data.

The following information applies to you if you are:

- An existing or prospective member of our club
- A person with parental responsibility for a member
- An existing or prospective club volunteer or official

## Our details

The Council is registered as a 'data controller' with the Information Commissioner's Office (ICO). Our registration details are:

Birmingham City Council  
Council House  
Victoria Square  
Birmingham  
B1 1BB

Registration No: Z4594350.

The Council's Data Protection Officer can be contacted as follows:

Corporate Information Management Team  
PO Box 16366 Birmingham

[infogovernance@birmingham.gov.uk](mailto:infogovernance@birmingham.gov.uk)

# Purpose of processing

The Council collect, hold and use personal data received by you to enable it to provide services to you. These services are extensive and include Leisure Services under which the City of Birmingham Gymnastics Development Programme at the GMAC operates. The amount and type of information held on you depends on the service we are providing to you for which you will not be asked for any information that is not necessary for the particular service you are/will be receiving.

# Lawfulness of processing

Processing of personal data shall be undertaken '*lawfully*'. To show the processing is being undertaken lawfully the following condition applies.

- *Processing is necessary for the purposes of the legitimate interests. Public authorities, such as the Council can only rely on legitimate interests if they are processing for a legitimate reason other than performing their tasks as a public authority.*

## Legitimate interests

The Gymnastics Performance Programme relies on legitimate interests for the following purposes:

### **A. Responding to communications, concerns or complaints and seeking feedback from you about our services.**

We will use the information you provide to respond to any comments or questions you raise and where appropriate to undertake investigations into any complaints or concerns. On occasion, we may contact you to seek your views on the services we provide.

### **B. Holding emergency contact information**

When you join the club, we collect contact details. We also ask you to provide an emergency contact which we will only use in exceptional circumstances if we are unable to contact your primary contact e.g. a parent.

### **C. Maintaining attendance registers, achievement records and waiting lists**

For health and safety purposes and club records, we need to maintain a register of those in attendance at training or other club activities e.g. records of progress towards an award scheme. If there are no places in the club, we can place you on our waiting list and will contact you using the details you provide to inform you when a place is available.

### **D. Entering you into a competition and providing results**

If you wish to take part in a club competition, your information, usually your name, date of birth and gender, will be used to enter you into the appropriate category and your score will be recorded. Results of competitions are sometimes published on our social media.

If you wish to enter a competition organised by another gymnastics body, including British Gymnastics we will provide your information to the organiser to enable you to take part in the competition or event that they are organising.

**E. Collecting additional information to support a participant attending a club trip**

Occasionally we organise residential events or trips. If you or your child registers for one of these events, we will need to collect additional information that may vary dependent on the specific activities and whether they involve meals and travel. Additional information we require may include passport information and any other relevant information necessary to provide support whilst away from home.

**F. Filming for coaching purposes**

On occasion, we may film gymnasts e.g. during a gymnastics session for coaching purposes. Videos taken at training sessions for individual coaching purposes will not be used for any other purpose without prior consent.

**G. Photography and filming to promote the club**

We may take photos at club events in order to promote the club via our social media platforms and in communications. At our events such as our annual awards, competitions and club display we may also film the event to create a DVD; any images of children will be published in line with our safeguarding policy.

Let us know if you do not wish to be filmed or photographed or do not want your image to be published. While we can usually take steps to prevent you from being photographed or filmed at small club events, please bear in mind that at large public events, it may be difficult to avoid capturing you in footage. However, we always review all photographs prior to publication and we will ensure any images of you are deleted.

We do not use any tracking or analytics on our website. Your IP address will be logged by our webserver but we would not be able to identify you from this information alone.

Please remember that you have a right to object to the use of your information for any purposes we undertake based on legitimate interests.

# Consent

## Consent for personal data

The Council also provide limited services which will require your consent to process your personal data. This could include for example leisure centre or library membership or other recreational groups, and in these situations the legal basis for processing your personal data referred to in the 'Lawfulness of Processing' above.

In circumstances as described above - your consent to process your personal data must be '*specific, informed, active and affirmative*', meaning it must be clear and freely given by you after we explain what further processing we would like to do with your data. You can therefore make an informed decision about whether you consent to the processing or not. You are in control and you can withdraw your consent at any stage by contacting the Data Protection Officer at the above address. (Please note however that any processing that has taken place up to the time that you withdraw consent will however be considered lawful).

## Consent for special category personal data

In respect of sensitive or 'special categories of personal data' we will require your '*explicit consent*' to further process this type of personal data this is covered within the 'Special Categories' below). This means your consent must be very clear and specific, and again you can withdraw your consent at any stage by contacting the Council.

Where the Council seeks to disclose sensitive personal data, such as medical details, to third parties, we will do so only with your prior explicit consent.

There may be occasions where we may have to disclose your personal data if it is required or permitted by law, for example in relation to crime prevention/detection. In these cases we do not require your specific consent or explicit consent for the disclosure of your personal data.

## Recording or managing consent

Once a citizens' consent is obtained we will keep a record of when the citizen consented, the information they were provided with prior to consent and how they consented.

Consent is part of your ongoing relationship with our citizens and will therefore be managed appropriately. The consent will be reviewed periodically to ensure it remains appropriate, and, as previously stated, citizens have the right to withdraw their consent at any stage.

# Processing 'special categories' of personal data

All personal data is not the same, and some information is more sensitive than others. As such special rules apply when processing these 'special categories' of personal data. Special categories' of personal data include:

- Racial or ethnic origin;
- Political opinions;
- Religious and philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric data for the purpose of uniquely identifying a natural person; and
- Sex life/sexual orientation.

Processing of these types of personal data is prohibited unless one of the conditions below applies (in addition to a condition from paragraph 6):

- The citizen has given explicit consent to the processing
- It is necessary for the purposes of carrying out the obligations and exercising specific rights of the Council or of the citizen in the field of employment and social security and social protection law. (For example employee equal opportunities data)
- Processing is necessary to protect the vital interests of the citizen or of another natural person, where the citizen is physically or legally incapable of giving consent. (For example a life or death situation)
- Processing is carried out by a not-for-profit entity with a political, philosophical, and religious or trade union aim in the course of its legitimate activities
- Processing relates to personal data which is manifestly made public by the citizen. (The personal data is already in the public domain)
- Processing is necessary for the establishment, exercise or defence of legal claims
- Processing is permitted where it is necessary for reasons of substantial public interest. (For example a natural disaster)
- Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment. (Medical treatment)
- Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health (such as foot and mouth disease); and
- Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

A comprehensive overview of Birmingham City Council's Privacy Statement please visit

[https://www.birmingham.gov.uk/info/20154/foi\\_and\\_data\\_protection/384/privacy\\_statement](https://www.birmingham.gov.uk/info/20154/foi_and_data_protection/384/privacy_statement)