



Rugby & Daventry Fencing Club (RaD Fencing)

The way the RaD Fencing manage and store your data and your rights under the Data Protection Legislation (UK GDPR and the Data Protection Act 2018) is set in the following document:

1. PURPOSE OF DOCUMENT

This Privacy Policy describes how personal data we collect from our members and other users of our services will be collected, stored and processed.

2. INTRODUCTION

RaD Fencing is a non-profit sport club that is registered with British Fencing, Club ID 959218. For the purpose of the Data Protection Act 2018, the data controller is RaD Fencing. RaD Fencing is committed to protecting your privacy and processing your personal data in accordance with the Data Protection Act 2018, the UK GDPR (as defined in the Data Protection Act 2018) and, to the extent applicable, the General Data Protection Regulation. This policy explains how the information we collect about you is used and kept securely.

3. THE INFORMATION WE COLLECT ABOUT YOU

3.1 WHEN INTERACTING WITH US VIA EMAIL AND TELEPHONE

We may collect the following information about you

Your name, email address, telephone number and any other information you voluntarily provide to us.

3.2 WHEN BECOMING A MEMBER

By joining RaD Fencing as a member you or your legal guardian agree to the member being bound by all relevant rules, codes and policies governing the activities and conduct of the membership including, without limitation, the Constitution, Codes of Conduct, Welfare Policies of the Club. Policies of RaD Fencing can be found here on our club Facebook page and are available on request.

If you choose to become a member, we will collect the following information about you through our enrolment forms

- Name, date of birth, gender, email address, address, contact telephone numbers. We will also assign you a unique Membership number.
- You will be given the option to provide information on any disability that you have which will be used to support you in the training sessions.

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We may also use the enrolment form to collect and store the following data

- The status of and/or copies of any coaching, workforce or officiating licences, qualifications and certificates that you hold.

- Information that is required to deliver membership and programme services

This may include, but is not limited to, additional contact information, any additional support needs, training and competition plans, medical/fitness information, emergency contact information, images (photographic or video), skills, qualifications, criminal record check id numbers. The purpose of collecting this information is to support participation.

3.3 WHEN PARTICIPATING IN AN EVENT OR ACTIVITY

You may provide us with personal data as part of applying for or participating in events or activities.

This may include, but is not limited to, additional contact information, training and competition plans, medical/fitness information, emergency contact information and images (photographic or video).

Where these activities or events are open to non-members:

- We may additionally collect your name, date of birth, gender, email address, address, contact telephone numbers.

- You may be given the option to provide your ethnicity which will be used anonymously for equality reporting.

- You may be given the option to provide information on any disability that you have which will be used anonymously for equality reporting.

- You may be given the option to share your disability information with event organisers which will be used by them to plan for any additional assistance you may need at an event you register for.

Occasionally, we take photos or videos of fencing activities. We may use these images in commercial materials that we produce such as flyers, posters for displays and on our Facebook page. We may also make video recordings for promotional, training, and educational purposes.

We may also send images to the news media of our activities/events/competitions. We will always ask for additional consent before we do this. When we submit photographs and information to the media, we have no control on when, where, if or how they will be used.

Personal data may also be collected in the event that you are involved in any accidents or disciplinary or safeguarding incidents and any subsequent investigation arising from these.

4. THE INFORMATION PROVIDED TO US BY OTHERS

We may also be provided with information about you from British Fencing.

That information may include: BF membership number, name, date of birth, gender, email address, address, telephone number, Home Country/Regional affiliations, name of the BF affiliated Clubs with which you are registered and any coaching or officiating licences that you hold.

5. HOW WE USE YOUR INFORMATION

We will collect and process your personal data on the basis of legitimate interests – for the purposes of providing the services that you have requested from us (including registering you as a member of RaD Fencing), performing the legitimate functions of a local fencing club and administering your involvement in the sport and also on the basis that processing is necessary for the performance of a contract to which you are a party. If you provide us with disability or medical data, we will only process this for the purposes of providing services to you.

On the basis of legitimate interests or where necessary for the performance of a contract to which you are a party, we may use your personal information for a number of purposes, including:

- To deliver the services that form a part of the membership you have.
- To deal with your requests and enquiries.
- To contact you for reasons related to your enquiry.
- To notify you about fencing events/competitions.

We will process your Fencing Data and any optional data that you supply on the enrolment form on the basis of the following legitimate interests:

- There is an administration portal where a selected number of staff and volunteers that support administrative functions can access data to help to respond to queries, update data and perform necessary administration activity.

- The regular monitoring of trends in the sport to allow RaD Fencing to make informed operational decisions and create reports for funders. Where possible, the information will be anonymised before use.
- Providing relevant and necessary information via email, to you about the following:
 - Changes to rules and regulations
 - Information regarding the governance of the club – e.g. elections, AGM
 - Updates to advice and guidance relating to specific roles held within RaD Fencing

6. SHARING YOUR INFORMATION

6.1 INDEPENDENT CONTRACTORS (EG COACHES) AND VOLUNTEERS

Much of the work that is performed by RaD Fencing is performed by a combination of member volunteers and independently contracted coaches. Designated volunteers will be responsible for administration; however it may be necessary to share contact details with coaches or other RaD committee members in order to carry out our services to you i.e. a coach to contact you for a change to the training session or competition.

6.2 ADMINISTRATIVE BODIES

Rad Fencing may also share your personal information with the police and other law enforcement and statutory agencies for the purposes of crime prevention or investigation and supporting work to safeguard children and vulnerable adults participating in sport.

If we disclose your information, we may ask the organisation to demonstrate that the data will assist in the prevention or investigation of crime or that RaD Fencing is legally obliged to disclose it.

This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with Data Protection Legislation.

7. PROTECTING YOUR INFORMATION

The data that we collect from you will be transferred to an external network (Google Drive) of which a small group of committee members have access to.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. We use up-to-date industry procedures to protect your personal information.

8. RETAINING YOUR INFORMATION

8.1 MEMBERSHIP DATABASE

We will retain your data for such time as you are a member registered with us and will then delete your information on a staged basis as follows:

Date of deletion

Type of info

Fencing Data

Name and date of birth, postcode,
Home Country

Name, gender, and date of birth

Twelve months after an individual has not played an active part in the sport.

This information will be anonymised after the twelve months period referred to above.

8.2 RESULTS, RANKINGS AND IMAGES

When you participate in a RaD Fencing event, your result at the event will be stored as a matter of historical record. Where images (photos/videos) exist from these events these will also be retained by RaD Fencing as a matter of historical record

Where you have participated in a BF registered event your result at that event will be stored as a matter of historical record. Where you participate in ranking events and earn ranking points your name will appear in the associated rankings, and these are retained by BF as a matter of historical record.

Where images (photos/videos) exist from these events these will also be retained by BF as a matter of historical record. Results, rankings, and selected images will be published on the BF website.

8.3 DISCIPLINARY & SANCTIONS

If you are sanctioned as a result of a disciplinary case, we will store your name and your membership number, alongside a copy of the final decision for 12 years from the expiration of the relevant sanction.

Information in regard to a disciplinary case instigated as a result of the outcome of a Safeguarding or Welfare Case Management Group meetings will be retained indefinitely whether or not a sanction is applied. When making reasonable enquiries and carrying out investigations into disciplinary matters, RaD Fencing may be required to disclose personal data relating to a disciplinary matter with club officials, welfare officers and third parties.

Other information relating to disciplinary cases (whether a sanction is applied or not) will be retained for 12 years from the date of the final decision in relation to that case.

8.4 SAFEGUARDING

Safeguarding case information and concerns will be stored indefinitely. In limited circumstances, where RaD considers it appropriate to do so and has identified an appropriate legal basis, RaD may disclose safeguarding concerns to welfare officers, club officials and third parties.

8.5 MEDICAL RECORDS

Members will be expected to provide appropriate medical details which will be shared with RaD staff members and volunteers with welfare responsibility for the training that the member is attending.

8.8 DBS (Coaches and volunteers)

RaD does not typically retain copies of certificates. RaD will note the date on which the check has been performed and the status of the check as part of our recruitment process. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

9. COMMUNICATIONS

9.1 MEMBERSHIP COMMUNICATIONS

We will communicate with you through email, notices posted on our Facebook page and other means. By joining RaD Fencing, you are indicating your consent to receive statutory notices to the email address you supply and accept that you are responsible for updating our records if your email address or other personal details change.

10. YOUR RIGHTS AND FINDING OUT WHAT INFORMATION BF HOLDS ABOUT YOU

All individuals who are the subject of personal data held by us are entitled to:

- ask what information we hold about them and why
- ask how to gain access to it
- be informed of how to keep it up to date
- have inaccurate personal data corrected or removed
- prevent us from processing information or request that it is stopped if the processing of such data is likely to cause substantial, unwarranted damage or distress to the individual or anyone else
- require us to ensure that no decision which significantly affects an individual is solely based on an automated process for the purposes of evaluating matters relating to him/her, such as conduct or performance
- be informed what we are doing to comply with our obligations under the Data Protection Act 2018.

This right is subject to certain exemptions which are set out in the Data Protection Act 2018.

Under data protection legislation, you can ask to see any personal information that we hold about you.

Such requests are called Subject Access Requests.

Subject Access Requests should be made in writing to the address given below.

Timescales

We aim to comply with requests for access to personal information as quickly as possible. In most cases we will be able to provide a copy of the information within one month of receipt of your written request. In order to do this, we may ask you to provide additional details about the source, location and timeframe of the information you are requesting.

We may on occasions extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

Manifestly unfounded or excessive requests

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- charge a reasonable fee taking into account the administrative costs of providing the information.

How will the information be provided?

We will verify the identity of the person making the request, using reasonable means.

Where the data is stored on the membership system you will be provided with direct access to your data via that system.

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Requests for large amounts of personal data

If your request requires us to process a large quantity of information, we will ask you to specify the information the request relates to.

Rights and freedoms of others

The right to obtain a copy of information or to access personal data should not adversely affect the rights and freedoms of others. If by providing the information requested, we would have to disclose information relating to or identifying a third party, we will only do so provided the third party gives consent, otherwise we may edit the data to remove the identity of the third party.

Unless we are under a legal obligation to release data, or the individual has given us permission, personal information will only be released to the individual to whom it relates. The disclosure of such information to anyone else without their consent may be a criminal offence.

Making a Subject Access Request

If you would like to make a Subject Access Request, please contact RaD's Committee at RaDfencing@mail.com

You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source, location, and timeframe of the information you are requesting.

11. QUESTIONS ABOUT THE POLICY

If you have any questions about this Policy, please contact RaDfencing@mail.com

12.1 PHOTOGRAPHY AND VIDEOS

RaD volunteers may be present at training and competitions and ask to take photos or videos of fencers who have agreed and given written consent in the enrolment form.

Images and videos may be used by BF and our subsidiary companies for the purposes of promotion, education, and development of the sport. They may also be shared with relevant third-party organisations for journalistic/promotional purposes with additional consent from the fencer or guardian.

Our process for using and storing photographs for Rad will be as follows:

Committee or coaches may use personal phones to photograph fencers who given written consent. The purpose of the photos may include:

- For marketing – flyers, posters, banners
- Social media – Currently Facebook
- Historical evidence for funders (for events and competitions)
- Press

Once photos have been uploaded to secure google folders or Facebook, all images will then be deleted from committee volunteers or coaches device or camera.

RaD is not responsible for personal footage (such as personal videos taken by parents), nor images taken by third parties, such as CCTV in venues.

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From time to time these documents will be further updated to ensure that RaD is fully compliant with Data Protection requirements and the way that RaD store and process personal data and your rights around that are clearly communicated.

If you have any comments on either documents please send your comments and questions to RaDfencing@mail.com.