

PRIVACY POLICY

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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.

This policy is to be read in conjunction with the BDF Website Privacy Statement which describes how data is collected and used on the BDF Website.

2. INTRODUCTION

British Disability Fencing is a private company limited by guarantee, incorporated and registered in England and Wales with company number 12297154. British Disability Fencing is also a registered charity, registered in England and Wales with the Charity Commission, with charity number 1187893. BDF is the data controller under data protection legislation.

BDF is the owner of www.britishdisabilityfencing.co.uk and the website. The website is maintained by ADOMedia, of 12, Chestergate, Macclesfield, Cheshire, SK11 6BA. For the purposes of data protection legislation, BDF is the data controller.

3. THE INFORMATION WE COLLECT ABOUT YOU

3.1 WHEN USING OUR WEBSITE, OR INTERACTING WITH US VIA EMAIL AND TELEPHONE

BDF is committed to protecting your privacy and processing your personal data in accordance with the Data Protection Act (DPA) 1998 up to 24 May 2018 and the General Data Protection Regulation (GDPR) on and from 25 May 2018 (Data Protection Legislation). This policy explains how the information we collect about you is used and kept securely.

We may collect the following information about you through our website at www.britishdisabilityfencing.co.uk:

- Your name, email address, postal address and any other information you voluntarily provide to us via our website and online forms.
- Your IP address (which is a unique identifier that computers and devices use to identify and communicate with each other) which is automatically recognised by the web server.

For further information with regards to the information we collect from you when you use our website please see our privacy statement.

3.2 WHEN BECOMING A MEMBER

By joining British Disability Fencing as a member you are joining British Disability Fencing Ltd and you or your legal guardian consent to the member being bound by all relevant rules, codes and policies governing the activities and conduct of the membership, including, without limitation, the Byelaws, Technical Regulations, Codes of Conduct, Child Protection and Anti-Doping Policies of BDF. Codes of conduct and other relevant policies can be found by clicking [here](#).

If you choose to become a member we will collect the following information (Fencing Data) about you through our online membership form.

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- Name, date of birth, gender, email address, address, up to 2 telephone numbers, clubs with which you are registered, whether or not you are a student and if so at which University. We will also assign you a unique Membership number. We refer to this data as 'Fencing Data'.
- You will be given the option to provide your ethnicity which will be used anonymously for equality reporting.
- You will be given the option to provide information on any disability that you have which will be used anonymously for equality reporting.
- You will 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.
- You will be given the option to provide a profile image. This may be used for event accreditation and licensing purposes and passed onto the International Wheelchair and Amputee Sports Federation (IWAS) and Ophardt Online System should you make an application to those bodies for licensing. These profile images may also be used in announcements and on the website when participants are selected for BDF teams and programmes.
- IWAS also uses an online portal hosted by Sport:80. The privacy policy that relates to use of the Sport:80 portal can be found here: https://bf.sport80.com/policies/privacy_policy

We may also use the membership system to collect and store the following data

- The status of any coaching or officiating licenses that you hold
- Information that we need to process any World Governing Body licences on your behalf
- Information that is required to arrange accommodation or travel on your behalf if you participate in BDF/GB squad activities.

3.3 WHEN JOINING A PROGRAMME

In addition to the information that all members supply to us, you may provide us with personal data as part of applying for or participating in teams or programmes.

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

The purpose of collecting this information is to support participation - eg use of video analysis in performance programmes.

3.4 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, images (photographic or video).

Where these activities or events are open to non-members we may additionally collect

- Name, date of birth, gender, email address, address, up to 2 telephone numbers,

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- 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 printed material that we produce, in displays and on our website. We may also make video or webcam recordings for monitoring, evaluation, training and educational purposes.

We also send images to the news media, or our activities/events/competitions may be visited by the media who will take their own photographs or film footage (for example, of a visiting dignitary or other high profile event). People will often appear in these images. The news media may use the images in printed publications (including local or national newspapers), on televised news programmes or on their website. They then store them in their archive. They may also syndicate the photos to other media for possible use, either in printed publications, on websites, or both. When we submit photographs and information to the media, we have no control on when, where, if or how they will be used.

To comply with Data Protection Legislation, we need your permission before we can photograph or make any recordings of you/your child. We will supply consent forms relating to the activity that you are participating in which explain how we will store and use photographs and images arising from an event.

All BDF Championships events will have official photographers and potentially live streaming. Consent for the processing of these images is requested at point of entry. For more information please see Appendix A.

4. THE INFORMATION PROVIDED TO US BY OTHERS

We may also be provided with information about you from clubs or partners with which you are registered.

In some cases clubs or partners will register you for membership. They will ask your permission to pass the necessary information onto us.

That information may include: BDF membership number, name, date of birth, gender, email address, address, telephone number, name of the BF affiliated Clubs with which you are registered and any coaching or officiating licenses that you hold. (Fencing Data).

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 BDF), performing the legitimate functions of a National Governing Body and administering your involvement in the sport.

On the basis of legitimate interests we may use your personal information for a number of purposes, including:

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- To deliver the services that form a part of the membership you have.
- To deliver the services that form part of the BDF programme/event/activity you are participating in.
- 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 membership form on the basis of the following legitimate interests:

- The use of Application Programming Interfaces (APIs) to provide external software providers with a facility to check and validate data to support administrative processes. For example:
 - o transfer of membership number, name and date of birth via an API to check licence validation at point of entry to fencing events
 - o transfer of membership number, name and date of birth to match against competition results
- 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 BDF to make informed operational decisions and create reports for funders. This relies on a report being run on the system and then downloaded to be analysed and interrogated by a select number of staff. Where possible, these reports will be anonymised before download.
- Providing relevant and necessary information via email, text, post to you about the following:
 - o Changes to rules and regulations
 - o Information regarding the governance of the sport—eg elections, AGM
 - o Updates to advice and guidance relating to specific roles held within fencing
 - o Transactional information relating to club affiliation and transfers, athlete registration, representative teams, competition and events, coach and officiating licenses, event licensing, courses, CPD events and qualifications.

When we collect information from you, we will tell you if we would like to send you information about our products and services. We will give you the opportunity to opt in to any such communications and will tell you how you can opt-out at any time.

If you choose to opt-in to additional communication we will use your personal data on the basis of consent.

Where you have opted into additional communications we will process your Fencing Data on the basis of consent.

Please see the Communications section below for more information.

A) in your subscription preferences section of your online membership form, or

B) by opting into communications through Social media, website, responding to emails

6. SHARING YOUR INFORMATION

6.1 INDEPENDENT CONTRACTORS (EG COACHES) AND VOLUNTEERS

Much of the work that is performed by British Disability Fencing is performed by a combination of staff, independently contracted coaches and member volunteers. In order to perform their roles it may be necessary to pass on personal information to people that are not employed by British Disability Fencing. Depending on the information requirements of the role that they perform, volunteers and independent contractors may be given access to elements of the membership system.

For example:

- As part of the GB selection process, selectors may require access to relevant personal information that you have supplied either as part of taking out membership, or information you have provided to us for the purposes of consideration by the selectors. This may include, but is not limited to, contact information, training and competition plans, medical/fitness information.
- If you participate in development programmes (eg athlete/Talent, coach, referee pathway) or related activities (eg athlete training camps) your relevant personal information that you have provided in relation to your participation in those programmes/activities may be passed to people who are delivering these development services on behalf of BDF. This may include, but is not limited to, contact details, training and competition plans, medical/fitness information, emergency contact information.
- If you are selected to represent GB, BDF may appoint people to the roles of Coach or Team Manager. As part of their duties they may need access to personal information that you have shared with BDF. This may include, but is not limited to, medical, passport, visa and emergency contact information.

We will share only what is needed for the purposes of performing BDF duties and, where possible, will anonymise the data before sharing. If we would like to share your information for any other purpose we will ask for your consent.

6.2 ADMINISTRATIVE BODIES

If you become a registered member with BDF, we will share your Fencing Data with the following bodies as part of the administration of your involvement in the sport:

- Organisers of events that you enter
- Third party data managers who support BDF in managing the sport
- British Fencing <http://britishfencing.com>
- IWAS <http://iwasf.com>
- Ophardt <http://ophardt.com>
- Sport80 <http://Sport80.com>

We will share only what is needed for those purposes and, where possible, will anonymise the data before sharing. If we would like to share your information for any other purpose we will ask for your consent.

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If we wish to share your data with third parties (eg event sponsors) for marketing purposes, we will tell you about this and only do so if we get your consent. You can opt out at any time by notifying us.

BDF 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 ask the organisation to demonstrate that the data will assist in the prevention or investigation of crime or that BDF 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 may be transferred to a destination external to BDF's own secure network.

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. The Internet is not generally a secure medium for communication and therefore we cannot guarantee the security of any information you send to us over the Internet. We use up-to-date industry procedures to protect your personal information. We also protect the security of your data using Secure Sockets Layer (SSL) encryption technology.

All hard copies of your data are kept in secure cabinets, in premises protected by a regularly serviced security alarm.

8. RETAINING YOUR INFORMATION

8.1 MEMBERSHIP DATABASE

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

Type of info

Date of deletion

Fencing Data

Seven years after an individual has not played an active part in the sport.

Name and date of birth, postcode, Home Country

This information will be anonymised after the seven year period referred to above.

Name, gender, and date of birth where athlete has competed in any ranking tournament and represented GB at any level

Indefinitely (see results and rankings below)

8.2 RESULTS, RANKINGS AND IMAGES

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Where you have participated in a fencing 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 BDF as a matter of historical record.

Where images (photos/videos) exist from these events these will also be retained by BDF as a matter of historical record.

Results, rankings and selected images will be published on the BDF website.

8.3 SELECTIONS

If you are selected for BDF and/or GB squads and teams your name will be stored indefinitely as a matter of historical record and published on the BDF website.

If you apply for discretionary selection (self-funding) the information that you supply will be retained by BDF for the period of 6 years from the date of decision.

8.4 PARTICIPATION IN BF PROGRAMMES

If you participate in any BDF programme (eg Talent Programme, Aspiration Programme, Coach Development) we will retain information for the period of time that you are participating in the programme. Once participation has ceased we will retain the record of your participation. Any other data provided solely for the purposes of participating in that programme will be deleted or anonymised for the purposes of statistical reporting.

8.5 DISCIPLINARY

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 the following periods
U18 at the time of application of the sanction - 3 years from expiration of sanction. Over 18 at the time of application of the sanction - 5 years from expiration of sanction.

We will retain anonymised disciplinary case information indefinitely.

We may also publish sanctions applied to persons age 18 or over on the BDF website. Disciplinary sanctions will be removed from the website 12 months after the expiry of the sanction.

Information in regards 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.

Other information relating to disciplinary cases (whether a sanction is applied or not) will be retained for 3 years from the date of the final decision in relation to that case.

8.6 SAFEGUARDING

Safeguarding case information and concerns will be stored indefinitely.

8.7 MEDICAL RECORDS

Only in exceptional circumstances will it be necessary for British Disability Fencing to store and access medical records.

Athletes representing GB will be expected to provide appropriate medical details which will be shared with BDF staff members and volunteers with welfare responsibility for the events that the athlete is attending.

Medical records which are a material part of a selection decision will be retained for 6 years.

8.8 CRIMINAL RECORD CHECKS

BDF does not typically retain copies of certificates. BDF will note the date on which the check has been performed and the status of the check. DBS checks for coaches and other members of staff are carried out by British Fencing.

In some cases a certificate contains information which impacts a recruitment or registration decision. 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 websites and other means. By joining British Disability 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.

If you are a member of British Disability Fencing you will receive communications about the sport and have a voice about the governance of your sport.

You will therefore automatically receive some key items to the email address you have supplied – including AGM & voting notifications where applicable.

You can opt-in to receiving other partner communications containing news and special offers within your online membership form.

There is some information that you can choose not to receive electronically, please check the appropriate options which can be accessed on your online membership profile. If you believe you have received electronic communications in error please contact British Disability Fencing Head Office immediately so that we can rectify the problem. It is not the intention of British Disability Fencing to send you communication you do not wish to receive. In an effort to keep costs down we may not in all cases be able to provide you with an alternative communication method.

All email messages to or from British Disability Fencing may be monitored to ensure compliance with internal policies and for our mutual protection.

9.2 E-NEWSLETTER

You can also choose to opt-out of receiving Allez! – which is the magazine for BDF members delivered as part of the Membership services.

We may use a third party provider to deliver our e-newsletters. These e-newsletters can be signed up to via the BDF website or social media links. We may use a third party provider/software to deliver our e-newsletters and manage the opt-in/out and unsubscribe facilities. If you (through the sign-up process) consent to us sending you these types of communications, we will let you know who the third party provider is at that time.

9.3 SURVEYS

All newsletters will contain instructions about how to opt-out of that newsletter and also unsubscribe to all similar e-newsletters.

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletters.

We will regularly carry out surveys using a third party provider, Survey Monkey (www.surveymonkey.com). These surveys may be accessible through our website.

When we collect your personal data through our website (eg through newsletter sign-ups) we may ask you for your consent to participate in our surveys.

When we collect your personal data through our membership data we will ask whether you wish to receive these surveys.

If you have provided consent to participate, we will transfer your data to Survey Monkey for these purposes only.

In each survey, we will clearly tell you what personal data we are collecting, why we are collecting it and what it will be used for. We will provide a link to terms and conditions for any incentives offered to take part in that survey. We do not link any other information about your browsing activity with the survey data, which is stored separately.

9.4 OTHER SERVICE AND MARKETING MESSAGES

Our communications may include emails which help inform you about matters relevant to your membership terms and conditions and emails related to the proper functioning of your account. If you are currently receiving service messages or marketing communications from BDF and no longer wish to do so, please let us know by contacting us at secretary@britishdisabilityfencing.co.uk

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

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- be informed what we are doing to comply with our obligations under the Data Protection Act.

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

Under the 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.

Fees

We will not charge a fee for this. However, we will charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

We will also charge a reasonable fee to comply with requests for further copies of the same information.

The fee will be based on the administrative cost of providing the information.

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; or
- refuse to respond.

If we refuse to respond to a request, we will explain why and inform you of your right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

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

Where the data is published on the BDF website, you will be provided with the links to the website.

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 BDF's Data Protection Officer: BDF Secretary
British Disability Fencing Head Office
24 Priors Acre, Boxgrove,
Chichester, PO18 0ER

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 BDF's Data Protection Officer: BDF Secretary
British Disability Fencing Head Office
24 Priors Acre, Boxgrove,
Chichester, PO18 0ER
or email secretary@britishdisabilityfencing.co.uk

12. APPENDIX A

12.1 BDF EVENT PHOTOGRAPHY

BDF accredited photographers may be present at BDF sanctioned events, and in some cases events might be videoed and/or live streamed. These images may be used by BDF 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.

BDF competition entry forms will advise participants that photography and filming will take place at the event. BDF will also announce the photography/filming arrangements at the event. Clubs/schools must ensure that fencers/parents/carers are informed of the photography arrangements for the relevant event. Any fencer or parent/carer who does not wish themselves or their child/adult at risk to be photographed/filmed at the event must advise the event organiser. Although it is not always practical to manage the content of live streamed footage, BDF will ensure any identifiable images of the participant are not published by BDF.

13. POLICY REVIEW

The policy will be reviewed in April 2021