



Bicester & District Gymnastics Club

BDGC 008 – Data Protection, Handling & Retention Policy

Document Owner: Chairman
Document Approver: Committee

Contents

1. Purpose	3
2. Scope	3
3. Policy	3
3.1. Data Protection Principles	3
3.2. Lawful Basis for Processing	3
3.3. Parental Consent	4
3.4. Data Retention	4
3.5. Data Handling	4
3.6. Security Measures	4
3.7. Data Breaches	5
3.8. Individual Rights	5
3.9. Privacy Notices	5
3.10. Compliance and Disciplinary Procedures	5
4. Monitoring Compliance	5
5. Review.....	5
6. Amendment and Termination	6

1. Purpose

This Data Protection, Handling & Retention Policy defines the Club's approach to collecting, processing, handling, and retaining personal data responsibly and in compliance with GDPR and IGA guidance, ensuring the privacy and protection of all data processed.

2. Scope

This Policy applies to all individuals, organizations and systems that access, process or store BDGC data.

This includes but is not limited to Individuals employed by BDGC or indirectly, temporary workers, visitors, voluntary and agency workers, third parties. All information created or received in the course of BDGC business must be protected according to its sensitivity, criticality, and value, regardless of its form or location.

When multiple information procedures or policies are applicable to the same information, the stricter of the requirement must be enforced unless otherwise instructed by the Chairperson.

3. Policy

3.1. Data Protection Principles

The Club adheres strictly to GDPR principles:

- **Lawfulness, Fairness, and Transparency:** Personal data will only be processed lawfully, fairly, and transparently, with clear information provided about how and why data is collected.
- **Purpose Limitation:** Personal data collected will have specified, explicit, and legitimate purposes and will not be processed further in ways incompatible with these stated purposes. Data minimisation
- **Data Minimisation:** Only personal data that is necessary and relevant to the specified purposes will be collected and retained.
- **Accuracy:** The Club will take all reasonable measures to ensure the accuracy and currency of personal data, promptly rectifying any inaccuracies identified or reported.
- **Storage Limitation:** Data will be stored only as long as necessary for the defined purposes, adhering strictly to recommended retention schedules.
- **Integrity and Confidentiality:** Robust security measures will be implemented to safeguard personal data against unauthorised access, accidental loss, damage, or unauthorised disclosure.

3.2. Lawful Basis for Processing

BDGC processes personal data on the following lawful bases:

- Consent (e.g., photography or marketing)
- Contractual necessity (e.g., delivering gymnastics services)
- Legal obligation (e.g., safeguarding and financial reporting)
- Legitimate interest (e.g., operational communication with members)

3.3. Parental Consent

Explicit parental or guardian consent is required before collecting or processing personal data, especially for health, contact, and media use information.

3.4. Data Retention

Personal data retention complies with IGA guidelines:

Data Type	Retention Period
Gymnast membership records	3 years after membership ends
Attendance registers	3 years after membership ends
Accident/incident reports	Until the child turns 21 or 3 years after incident
Safeguarding records	Retained indefinitely or as directed by authorities
Financial/accounting records	7 years (per HMRC requirements)
Emergency contact and health info	Until membership ends + 1 year

3.5. Data Handling

All personal and sensitive information held by BDGC must be handled in accordance with this policy and the UK GDPR principles of lawfulness, fairness, and data minimisation.

- **Authorised Processing** - Only individuals with a legitimate operational need may access or process personal data. Processing includes collecting, viewing, storing, sharing, or deleting data.
- **Permitted Systems** - All personal data must be stored and processed using BDGC-authorized systems and equipment. This includes club-managed computers, tablets, and email accounts. Personal or shared devices must not be used to store or transmit BDGC data.
- **Printing and Hard Copies** - Where there is a legitimate requirement to print personal information, documents must be:
 - Kept secure and out of public view at all times
 - Used only for the specific purpose intended
 - Destroyed promptly using a cross-cut shredder or secure disposal method once no longer required
- **Email and Sharing** - Data must not be shared via personal email or messaging platforms. Information may only be sent to individuals with a legitimate need to know, using BDGC-authorized email accounts or encrypted platforms where applicable.
- **Confidentiality and Conduct** - Data protection carries the same importance as safeguarding and wellbeing. Personal, medical, or private information must never be disclosed or discussed with anyone outside the Club unless required by law or with explicit consent from the Club Committee.

Any loss, misuse, or unauthorised disclosure of data must be treated as a data breach and reported immediately in line with section 3.7 of this policy.

3.6. Security Measures

BDGC maintains secure electronic and physical systems for data storage. Access to personal data is restricted to authorised personnel only. All devices and platforms are password protected and updated regularly with encryption across devices where available.

3.7. Data Breaches

All suspected data breaches must be reported immediately to the Club Committee. If a breach is likely to result in a risk to individuals' rights and freedoms, it will be reported to the ICO within 72 hours.

3.8. Individual Rights

Under UK GDPR, individuals have the right to:

- Access their data
- Rectify inaccurate data
- Request erasure ("right to be forgotten")
- Restrict processing
- Object to processing
- Data portability

Requests should be submitted to the Club Committee. BDGC will respond within one calendar month.

3.9. Privacy Notices

A privacy notice outlining data collection, usage, retention, and sharing will be provided at the point of data collection.

3.10. Compliance and Disciplinary Procedures

Any breach of this policy will be taken seriously and may lead to disciplinary action. In serious cases this could include summary dismissal under our disciplinary procedure. Any breach of this policy must be handled in accordance with all other relevant company policies within BDGC.

4. Monitoring Compliance

The adoption of this policy is subject to monitoring and auditing. The outcomes from these reviews will inform and improve practices as part of BDGC's commitment to continual improvement.

5. Review

This Policy will be reviewed at least annually.

6. Amendment and Termination

This Policy can be amended, replaced, or terminated at any time at the sole discretion of BDGC. If you have any questions about whether you are reviewing the latest Policy, please confirm with the Owner of this document identified below.