

# CLUB POLICIES

COTSWOLD GYMNASTICS CLUB – JUNE 2020

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## SAFEGUARDING POLICY

Cotswold Gymnastics Club is committed to ensuring that those working with children and vulnerable adults adopt best practice to ensure the health, safety and welfare of the participants, coaches, club officials and volunteers. Any concerns about welfare should be reported directly to the Club Welfare officer on 07879 628716 or [welfare@cotswoldgymnastics.co.uk](mailto:welfare@cotswoldgymnastics.co.uk).

The club will endeavour to promote the highest standards of care for all members, coaches, officials and volunteers by:

- Ensuring that there is no unauthorised photography and videoing during training and events. This includes the use of mobile phone cameras.
- Having a zero-tolerance level of poor practice, bullying and any potential form of abuse.
- The adoption of the British Gymnastics Health & Safety and Safeguarding policies.
- The appointment of a Welfare Officer (Child Protection Officer) to whom grievances or complaints can be made confidentially.
- Ensuring staff are suitably trained in Safeguarding, Health, Safety and Welfare issues,
- Ensuring that coaches and official have been screened to confirm their suitability to work with children. Where appropriate this will include checks with the Disclosure Barring Service (DBS).
- Ensuring that best coaching practice guidelines are followed at all times.
- Ensuring that grievances or complaints are dealt with promptly and in accordance with the grievance procedures.
- Ensuring that a minimum of two responsible adults are present at all training sessions or events.
- Any Welfare concerns will be treated with full confidentiality, with information only being shared with the necessary people required to deal with the concern.

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## DISCIPLINE POLICY

Cotswold Gymnastics Club are committed to ensuring any unacceptable behaviour experienced in the club is dealt with fairly and promptly. Disruptive or threatening behaviour of any kind, including bullying is unacceptable and will not be tolerated.

The discipline policy extends to any incidents where gym rules or any of the clubs codes of conducts are not adhered to.

The club will operate the following three strikes policy:

1. Any member, parent, club official or volunteer failing to meet behaviour standards will receive a verbal warning and may be asked to sit out in class. Parents will be informed.
2. If the behaviour continues a written warning will be issued.
3. If the written warning has no effect the gymnast may be suspended or expelled from the club at the discretion of the committee.

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## EMERGENCY PROCEDURE

All staff should make sure they have familiarised themselves with these. All parents and children must be made aware of the emergency procedures in each venue.

In the event of a fire or other emergency needing us to vacate the building, an alarm bell will sound and upon hearing the alarm the following procedures must be followed: -

- The Lead Coach will collect the register, advise gymnasts to collect shoes and clothes if safe to do so (that are in the room) and line up. They will leave the building by the nearest fire exit.
- Go immediately and report to the assembly point by the trees at the far end of the tennis/netball courts. Check everyone against register and report anyone missing to Fire Brigade
- Do not re-enter the building until you are told that it is safe to do so by the Fire Brigade.

## **SAFEGUARDING COMMUNICATION – For Gymnasts, Parents & Coaches**

British Gymnastics has a strict policy on the use of the Internet and has published good practice guidelines on the use of social networking sites. We fully adopt this policy, main points of which are summarised below:

- No coach is permitted to communicate directly with an individual gymnast under the age of 18, through text, internet chat rooms, and social networks (including Facebook and Twitter) or by e-mail.
- Communication to gymnasts under 18 years old must be through parents or group emails or from updates posted on the gym website. Coaches in a position of trust must not communicate on a 1-1 basis with their under 18-year-old gymnasts.
- Under no circumstances should a coach communicate with a gymnast under 18 years old via Skype, Facetime or any other instant/video messaging apps.
- Gymnasts, Parents and Coaches must not post unfavourable, personal or disrespectful comments regarding gymnasts, coaches, club personnel, the club or any other club on public networks such as Twitter, Instagram.

If you become aware that the above is occurring, please contact the club Welfare Officer.

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## **TRANSPORTING GYMNASTS POLICY**

BG Safeguarding Policy requires that coaches do not take children alone on car journeys, except in unforeseen circumstances. \*

It is unacceptable for coaches/club officials to transport one child alone, and in the case of transporting a group of gymnasts best practice would require two responsible adults in the car. However, in exceptional circumstances where this is not possible, and subject to prior consent from all relevant parents, a coach/club official could transport a group of gymnasts without another adult present. This is subject to the following conditions:

- The driver must ensure there are central pick-up and drop-off points to ensure they are not alone with a child;
- The driver should also provide parents with full details of any planned breaks in the journey and departure and arrival times;
- Gymnasts must be seated in the back of the car with booster seats if required;
- The Club Welfare Officer should be made aware of the arrangements.

\* Unforeseen would only apply in the event of an accident or where something unexpected has happened and there is no other alternative but to take a child alone in the car and to fail to act would put the child at risk of harm. Where these situations are unavoidable, and whenever possible, the full consent of either the Welfare Officer, Head coach or Official in the club and/or the child's parents should be obtained.

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## **CLUB AND GYM RULES**

We are fully committed to safeguarding and promoting the well-being of all our members. The club believes it is important that members, coaches, administrators and parents associated with the club should, at all times, show respect and understanding for the safety and welfare of others. Therefore, members are encouraged to be open at all times and share any concerns or complaints that they may have about any aspect of the club with the Welfare Officer.

### **Club Rules**

1. Display high personal standards and a favourable image that is befitting to the role in the sport.
2. Not endanger the reputation of Cotswold Gym Club or British Gymnastics through inappropriate practices or behaviour.
3. Display responsible behaviour at all times.
4. Be polite courteous and respectful to others.
5. Use their knowledge as objectively as possible and maintain a scrupulous fairness in their dealings with others.

6. Endeavour to dissipate inflammatory situations.
7. Ensure that differences of opinion or conflicts are dealt with through the proper processes  
Not abuse, harass, bully or victimise others.

### **Gym Rules**

1. All coaches and gymnasts must have British Gymnastics membership (for new gymnasts, this must be in place by their third session).
2. Regular attendance is required.
3. Gymnasts must be punctual.
4. Parents must drop-off and collect gymnasts into/from the atrium and stay with them until a coach calls them for their session. To ensure the children's safety they **must not** be dropped off in the carpark to make their own way over to the building.
5. The membership secretary/Coach should be informed if a child is to miss more than 3 consecutive gym sessions.
6. Acceptable clothing must be worn during all gym sessions, no hoodies are allowed, and no socks are to be worn unless accompanied by gym shoes. Coaches must wear clothing deemed suitable by the club's head coach.
7. All personal equipment should be kept out of the working area of the gym.
8. **No jewellery is to be worn** during sessions or left around the edge of the gym. No responsibility will be accepted by the coaches, for any personal belongings.
9. All hair below shoulder length **must** be tied back.
10. No gymnast should use any of the apparatus without the permission or presence of a coach.
11. At the end of each session for safety reasons children must not continue to use the equipment when their gym session has ended.
12. Gymnasts must not leave the gym without the permission of a coach and should not wander into any other part of the building.
13. No monies are to be handed to coaches. Please hand monies to one of the committee members.
14. Coaches should not be approached or distracted whilst coaching. If you need to speak to a coach do so before start of session or at end.
15. Children should not practice gymnastics in the atrium as this area is not set up for gymnastics and it is not supervised by any coaches.

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### **CODE OF CONDUCT – For Participants**

As a member of Cotswold Gymnastics Club, you are expected to abide by the following club rules:

- All members must participate, adhering to the club rules above and respect coaches, judges and their decisions.
- All members must respect opponents and fellow club members.
- Members must wear suitable attire for training and events as agreed with the coach. Keep all long hair tied back.
- Remove all body jewellery.
- Members must pay any fees for training or events promptly.
- Members should treat all equipment with respect.

- Members must inform the head coach of any injuries or illness then may have before the warm-up begins.
- Members should not eat or chew gum during a session.
- Members must not use bad language.
- Members should remain in the atrium at the end of a session until collected by their parent or guardian.
- Respect club premises and other parties present.
- Members must not smoke, consume alcohol or take illegal drugs of any kind whilst training or representing the club.

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#### **CODE OF CONDUCT – For Parents**

- Encourage your child to learn the rules and participate with them.
- Discourage challenging/arguing with officials.
- Publicly accept official's judgements.
- Help your child to recognise good performance, not just results.
- Set a good example by recognising good sportsmanship and applauding the good performances of all.
- Never force your child to take part in sport.
- Always ensure your child is dressed appropriately for the activity and has plenty to drink.
- Endeavour to establish good communications with the club, coaches and officials for the benefit of all.
- Share any concerns or complaints about any aspect of the club through the approved channels.
- Use correct and proper language at all times.
- Never punish or belittle a child for poor performance or making mistakes.
- Always ensure your child arrives on time for their session.
- Always register your child's' attendance.
- Always collect your child promptly at the end of a session.
- Support your child's involvement and help them to enjoy their sport.
- Respect club premises and other parties present.

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#### **CODE OF CONDUCT – For Club Coaches, Officials and Volunteers**

From the moment a child arrives in their session or event, or when they are handed over by their parents to travel to an event, the staff or volunteers have a duty of care and, while carrying out a supervisory role, should act in loco parentis. The responsibility remains until the child is handed back to the parent.

- Ensure that if mixed teams are taken away on trips, at least one male and one female member of staff accompany the gymnasts.
- Treat all participants equally with respect and dignity.
- Always place the safety and welfare of the participants as the highest priority, report any incidents, referrals or disclosures immediately following appropriate guidelines.
- Behave in an exemplary manner and be a role model for excellent behaviour.

- Keep up to date with knowledge and technical skills.
- Do not exceed the level of competence and qualifications.
- Respect the needs and wishes of the participants and do not exert them against their will.
- Never consume alcohol immediately before or during training or events.
- Promote the positive aspects of sport (e.g. fair play)
- Obtain prior agreement from the parent/guardian of gymnasts before transporting them anywhere.

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## **ACCIDENT AND SAFETY ARRANGEMENT**

- At each session/event there must be a first-aider present at all times. coaches must familiarise themselves with the person responsible for first aid at their session.
- It is the Club Managers responsibility to ensure the first aid kits are correctly stocked.
- In the event of a serious accident the emergency services will be called for medical help.
- To call the emergency services please use Coach in Charge's mobile phone in the event there is no network coverage use an alternative phone.
- In the case of an accident, an accident/incident report form must be filled in, these forms are kept in the registers.
- We advise parents to inform us of any injury sustained outside of the club, which may affect the participant during their activity.
- It is the responsibility of the head coach to ensure all staff are aware of injuries to children.
- All coaches, helpers and participants must adhere to the accepted standards of practice at all times.

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## **EQUALITY POLICY**

Cotswold Gymnastics Club is committed to high standards of conduct and best practice through the principles of equality, good moral and ethical frameworks.

The club will encourage individuals from all communities to become involved at all levels of participation, coaching, officiating and management.

Any concerns about welfare inside or outside of the club should be reported directly to the Club Welfare Officer.

The club will aim to uphold that all members and staff adhere to the following equality principles:

- All persons must respect the rights, dignity and worth of every human being and their right to self-determination.
- All individuals must be treated fairly and equally regardless of gender, age, ethnic origin, religion or political persuasion or disability.
- Equality must permeate throughout strategic and development plans.
- An equal professional service will be provided for all participants and discrimination through race, gender or disability will not be tolerated.
- Sexual and racial harassment and discrimination will be prohibited.

Any equality concerns will be treated with full confidentiality, with information only being passed onto the necessary people required to deal with the concern.

The club are also committed to Equality Impact Assessments (EIAs) to assess policies and events we have and if these have the potential to affect people differently.

Cotswold Gymnastics Club also follows the equality policy guidelines set by British Gymnastics.

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## **COMPLAINTS AND GRIEVANCE PROCEDURE**

This procedure sets out the actions to be taken when a complaint or allegation is made to a Club Official or where a Club official has concerns about misconduct by any participant.

In this context, misconduct includes any breach of rules, policies or codes of conduct of the club or of British Gymnastics. It also includes any breach of etiquette, which is defined as being “a breach of good manners or behaviour not in conformity with the accepted traditions of gymnastics”.

It is intended that this procedure should only be used in serious cases where formal investigation and determination is appropriate and required. Any concerns not requiring this degree of formality should be referred to the Head Coach, Welfare Officers or other responsible person.

### **Making Complaints**

In the event that any individual feels that he or she has suffered discrimination in any way or that the Club Policies, Rules or Code of Conduct has been broken, they should follow the procedures below:

1. Report the matter to the Head Coach or Welfare Officers or another member of the Committee.

The report should include:

- Details of what, when and where the occurrence took place
  - Any witness statement and names
  - Names of any others who have been treated in a similar way
  - Details of any former complaints made about the incident, date, when and to whom made
  - A preference for a solution to the incident.
2. The Club's Committee will sit for any hearings that are requested.
  3. The Club's Committee will have the power to:
    - Warn as to future conduct
    - Suspend from membership
    - Remove from membership any person found to have broken the Club's Policies or Codes of Conduct.
    - Dismiss the complaint

### **Serious Misconduct**

If the Lead Officer to whom a complaint has been made:

- Considers the alleged misconduct might result in criminal charges against a member of British Gymnastics; or
- Considers the alleged misconduct may involve a breach of child protection policy by a member of British Gymnastics

they are to suspend further action under this procedure and the complaint should be referred to the Head of Ethics and Welfare at British Gymnastics.

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### **Cotswold Gymnastics Club privacy notice – members, volunteers and employees.**

Cotswold Gymnastics Club is the data controller and is committed to complying with our legal responsibilities under data protection law. We take your privacy seriously and will ensure your personal information is kept secure.

When we collect, use, share, retain or do anything else with your personal information (known collectively as 'processing') we are regulated under the General Data Protection Regulation (GDPR) and are responsible as 'controller' of your information.

This notice 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
- An employee

It is important that you read this carefully as it contains key information about how we use your personal data and your associated rights.

## About us

Cotswold Gymnastics Club is a 'not for profit' Committee run organisation. Our members are gymnasts or the parents (if the gymnast is a child). We provide the opportunity for our members/people to participate in our activities, which include recreational classes, training, camps, competitions, squads and other similar gymnastics activities.

We register with British Gymnastics who governs the sport, provides insurance for clubs and individual members and offers competitions and events. It is a condition of British Gymnastics club registration that all our club members also register as individual members of British Gymnastics.

We also affiliate to GAGA (Gloucestershire Amateur Gymnastics Association) and SWAGA (South West Amateur Gymnastics Association) who run competitions and events in which we may participate.

## Information we collect about you

The categories of personal information we process includes:

- Contact details\* (gymnast or parent and emergency contacts)
- Gymnast date of birth\*
- Gymnast gender \*
- Any relevant medical conditions and/or disabilities and additional related information
- Other relevant individual needs for example, information about learning, religious or other support needs.

British Gymnastics collects the above information on our behalf when you join or renew your British Gymnastics membership.

- Any individual risk assessments (gymnasts and others if applicable)
- Details of any reasonable adjustments or steps taken to support your individual needs
- British Gymnastics membership details\* (which are confirmed by British Gymnastics when you join or renew)
- Gymnast attendance and achievement records
- Any communications from, to or relating to you
- Details relating to standards of conduct
- Any accident or incident reports including details of injuries
- Bank details (If we are making payments to you e.g. for volunteer expenses)
- [Tax status (if you have agreed for us to claim gift aid on your donations).
- Experience, qualifications, training and confirmation that you have completed a criminal record check (prospective or existing volunteers).

The information marked with an \* above is essential for us to provide your membership. It is your choice whether you provide all the information we have requested but not providing information may affect our ability to meet you or your child's needs and to protect their well-being.

If you are a competitive gymnast, we record other information about you to support your training and participation in competition such as:

- Training and technical information
- Lifestyle information
- Nationality (if you are competing at international level)
- Leotard Size

If you attend an event or trip with the club, we will also collect the following information where relevant:

- Dietary requirements and any other relevant information that we need to know to ensure your needs are met; and
- Passport information if the trip is abroad.

## **Our purposes for processing information about you**

We use the information we hold about you for a variety of purposes which are outlined below. Data protection law requires us to tell you what our legal reason is for each purpose.

### **Contractual purposes**

When you ask us to provide you a service, such as club membership or registration, gymnastics classes, competitions, trips or other activities, or you buy a product from us, we usually need to use information about you to provide this product or service, for example:

- To contact you to confirm arrangements;
- To notify you about changes to terms and conditions;
- To tell you when it is time to renew membership or re-register for activities
- To process payments or send you receipts required.

We do so because it is necessary for the performance of a contract.

### **Legal obligations**

We have a duty of care to ensure it is safe for you or your child to take part in gymnastics activity and to keep you/them safe while participating. Some individuals may be at risk of harm from participating in gymnastics activity as a result of a pre-existing condition. It is vital that you let us know if there is any reason why taking part in gymnastic activity may be unsafe prior to participation. With your agreement, we will review any information you provide and undertake risk assessments in consultation with yourself and any appropriate trained professionals e.g. medical consultants. When we ask participants to provide relevant health information such as details of medical conditions, medication needs, allergies or injuries, this is because we have a legal obligation.

If you are selected for a role at the club, we will usually obtain a reference from any appropriate organisation or individual you have nominated.

When you tell us about any special needs such as disabilities or other support information, we may use relevant information to comply with our legal obligations under the Equality Act 2010. We will review any information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us to best meet your or your child's needs. We will keep a record of any steps we take to support inclusion.

If you are wishing to volunteer or work for us, we may need to ask you to complete a criminal record check as we have a legal obligation to do so. We jointly control the checking process with British Gymnastics who is responsible for the assessment of any content on the check and will only share information with us where it is appropriate. For example, if you are considered by British Gymnastics to be unsuitable to take on the role, we may share relevant and proportionate information about criminal offences where it is deemed that while you are not considered unsuitable to take on the role, if it is considered necessary for safeguarding purposes.

When we retain information about you, even after you are no longer taking part in gymnastics activity, this is often because we are required to do so by law such as records, we are required to keep for business and accounting purposes. Sometimes we are also legally obliged to share information about you with third parties. More information it provided below.

### **Legitimate interests**

We rely on legitimate interests for the following purposes:

- **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.
- **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.

- **Maintaining attendance registers, achievement records (Badge progress) 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.

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.

- **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 normally published on the competition host club's website and are distributed in printed format to gymnasts & spectators at the event.

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

- **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.
- **Monitoring performance and undertaking fitness assessments**  
If you or your child are/is a competitive/elite/squad gymnast, we will need to collect additional information about you/them. We track and monitor gymnast's performance in training, trials and competition and undertake regular fitness assessments. We may require additional information about lifestyle and education if you or your child are/is training at an elite level and requires time out of school or lifestyle.
- **To monitor that you have completed any required safeguarding training and criminal record checks**  
If you undertake a role where a criminal record check and safeguarding training are required, we will receive confirmation from British Gymnastics if your check is approved and that you have completed the required safeguarding training.

#### **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.

- **Photography and filming [at large club events] to promote the club**

We may take photos at club events to promote the club on our website, club social media account and in communications. At our large club events such as our annual club competitions and club display, we may take photos to promote club activities and may film the event to create a DVD. We publish images on our website, social media account and in our communications. Any images of children will be published in line with British Gymnastics/other 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 our 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.

If we are filming or taking photos for any other purpose, we will ask for your consent.

- **Running and monitoring our club website and social media**

Our website '[cotswoldgymnastics.co.uk](https://cotswoldgymnastics.co.uk)' uses Google Analytics to collect limited information about your visit to our website. The Google Analytics Privacy Policy can be viewed online here; <https://policies.google.com/privacy?hl=en-US>

We have E-mail forms for users to contact the club. We collect the following information;

**Contact Us.** Sent to the Club manager for general queries. Data collected:  
Your Name, E-mail Address, Phone number (optional), Address (optional), Subject, Message

**Enquire.** Sent to the Club manager for new start enquiries. Data collected:  
Parents Name, Gymnasts First name, Gymnasts Last name, E-mail Address, Phone Number (optional), Home Address (Optional), Gymnasts Birth date, Additional Details

Data collected: Participants Full name, Participants preferred name, Participants Data of Birth, Participants Identified Gender, Parents/Guardian Full Name, E-mail Address, Contact Number (1), Contact Number (2), Full Address Inc. Post Code

We have an active **Instagram** account in which we post videos and photos including of gymnasts performing moves or sequences. If the person(s) recorded is over 18 years of age, we (a club representative) shall ask their permission before uploading and sharing any content to Instagram. If they are under 18 years of age, we shall ask permission from the parents/guardians.

We have an active **Facebook** account which on occasion, mentions gymnasts by name, may include photos and relevant notices about the club, sessions, events and competitions. If we wish to use a person(s) photo, video or identifiable information, we (a club representative) will seek permission prior to posting. If the person(s) referred to is over 18 years old, we (a club representative) shall ask their permission before uploading and sharing any content to Facebook. If they are under 18 years of age, we shall ask permission from the parents/guardians.

We have an inactive **Twitter** account. This is used for sharing notices only and not personal identifiable information, photos or videos pertaining to individual gymnasts, volunteers, coaches or members / affiliates of the club.

#### • Using CCTV for security and crime detection/prevention

Deer Park School has a CCTV system that is out of our control and may capture images of Cotswold Gymnastics Club members.

### Employees

As your employer, the Company needs to keep and process information about you for normal employment purposes. The information we hold, and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

The sort of information we hold includes your application form and references, your contract of employment and any amendments to it; correspondence with or about you, for example letters to you

about a pay rise or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

You have a right to object to the use of your information for any purposes we undertake based on legitimate interests. Further information is provided in the section below on individual rights.

## Consent

We rely on consent in the following circumstances:

- **To use your email or telephone numbers for marketing purposes**
- **To take photographs and video at a small club event or training for publication.**

With your consent, we may also take photos during training or at small club events to promote the club on our website, club social media account and in communications. All film and photos of children will be published in line with our safeguarding policy.

### • To claim gift aid

As a registered charity we are eligible to claim gift aid on any donations from donors who pay tax in the UK with your agreement.

When you have given us your consent for your personal information to be used for a particular purpose, you have the right to withdraw this consent at any time, which you may do by contacting us using the contact details below. If you provided (any) consent(s) for a specific purpose as part of the information you provided on our behalf through the British Gymnastics membership platform, this (these) consents can be withdrawn at any time by logging into your British Gymnastics account. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.

## Special categories of personal data

Special categories of personal data are a category of information that is more sensitive and requires greater protection. Some of the information we process falls into this category (e.g. health/medical data or any information you provide to us about a disability or your religion, race or gender identity). It is unlawful for organisations to process this type of information unless an additional legal condition applies. We will only process this type of information if one of the following applies:

- You have given your explicit consent or have made this information public;
- We are required to do so to establish, exercise or defend a legal claim;
- We are required to do so to comply with employment or social security or social protection law;
- Legitimate activities of a 'not for profit' organisation;
- There is a substantial public interest in doing so; or
- It is in your vital interests and you are unable to provide consent e.g. if you are unconscious or do not have sufficient mental capacity.

## Marketing

With your consent, we will send you our newsletter and other information about our activities, services and products that we think might be of interest to you based on your age, interests and experience. We will send you this information by email or SMS (subject to your communication preferences).

You can ask us to stop sending you this information at any point by contacting us or by amending your preferences in your British Gymnastics 'My Account'] It may take up to [21 days] for this to take place.

## Why we share information about you

We have a legitimate interest in sharing your personal information with British Gymnastics to ensure the sport is safe and well-governed and where relevant to access support and advice.

We may also be required to share your personal information in the following reasons:

- Complying with legal and/or regulatory responsibilities

We may be required to share information with bodies such as Her Majesty's Revenue & Customs (HMRC), Health & Safety Executive (HSE), Police and Information Commissioner's Office (ICO). We may also share information with other organisations to safeguard children. Any information that is shared will be strictly limited to

what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

- Insurance
- Obtaining legal or professional advice
- Obtaining a service from a third party

All service providers are contractually required to ensure your information is secure and cannot use this information for their own purposes. Where we are required to share information with them to provide the service, we only disclose information that is strictly necessary to deliver the service.

Except for the above, will only share your information with any other third parties with your prior agreement.

### Transfers of data out of the EEA

We may transfer your personal information to countries which are located outside the European Economic Area (EEA) for the follow purposes:

Our Website is hosted with a third-party Service, Wix.com The website content and Serving of content is stored in the United States of America (U.S.). Requests for data I.e. Web pages and form completion will sent to/from the U.S. and subject to their data protection and access laws. For more information, please see <https://www.wix.com/about/privacy>

Our E-mail hosting is provided by Google G-Suite. Content and Service is stored in the United States of America (U.S.) E-mail content, attachments and metadata are sent to/stored in U.S. and subject to their data protection and access laws. For more information, please see Privacy Policy. <https://policies.google.com/privacy?hl=en-GB>

We use MailChimp as an e-marketing service to send bulk E-mail communications to our members. This service is provided by Mailchimp® who operate from the United States of America (U.S.) and are certified as

- adhering to the EU-US Privacy Shield. Mailchimp Servers and offices are located in the United States, so your information may be transferred to, stored, or processed in the United States. For more information, please see the MailChimp Privacy Policy. <https://mailchimp.com/legal/privacy/>

We will not transfer your information to any other country or organisation outside the EEA unless there is a European Commission adequacy decision for the specific country to which the data is transferred or where we can be certain that there are adequate safeguards provided for your information and individual rights standards that meet the GDPR requirements.

Please contact us if you would like further information about why transfers to the above countries are permitted under GDPR.

### Individual rights

You have important rights under data protection law. In summary these include:

- **To be informed about how your information is processed** (set out above)
- **To access any personal data held about you**

You have the right to access the personal information we hold about you. You can log in to 'My Account' at any time to view/amend/delete the information we hold about you that has been collected by the British Gymnastics system. You can also request a copy of any other information we hold by writing to us.

- **To have your data rectified if it is inaccurate**  
If you think that any of the information, we hold is inaccurate, you can ask that corrections are made. We will either make the requested amendments or provide an explanation as to why we are not making changes

- **To have your data deleted (except if there is a valid lawful reason to retain it)** If you do not renew your membership or cease to have a relationship with the club, we will delete any information you provided within two years except for any financial/accounting records which need to be retained for six years in line with UK tax law. Additional information that has been provided solely for the purpose of participating in a specific activity will be deleted after the event

Video footage that has only been taken for coaching purposes will be retained only for as long as it is required for that purpose and in most cases, will be deleted within one month.

Photographs and other video footage captured for promotional purposes will be retained for up to 4 years. After this time, they will be deleted unless we consider them to be of public interest and should consequently be archived for historical purposes. Where images have been published on social media, these platform providers may continue to process your data after the retention period has lapsed.

You have a right to request the deletion of your information in advance of the above retention periods. We will delete this information unless there is a lawful reason for the information to be retained.

- **To have your information restricted or blocked from processing**  
If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.
- **To portability**  
If you wish to move to another club, you can transfer your information to another club registration by logging into 'My Account' on the British Gymnastics system. Alternatively, if you wish to leave the club, the information you provided on behalf of our club will be archived on the British Gymnastics system for 60 days and will be deleted after this has lapsed. During this period, you can transfer your information to another club. This may be limited to your club membership

• **To object to:**

- **- Any processing based on legitimate interests**

The right to object is specific to the data subject's particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your individual interests, rights and freedoms or we need to continue to process your information in connection with a legal claim.

- **- Your personal information being used for direct marketing activities** You can object to our direct marketing activities by unsubscribing from the relevant communication as described above in the marketing section of this notice.

To exercise any of your rights or if you have any questions about our privacy notice please contact:

Mrs Angela Vizer. Email – [committee@cotswoldgymnastics.co.uk](mailto:committee@cotswoldgymnastics.co.uk).

While we hope to be able to resolve any concerns you have about the way that we are processing your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR or have any wider concerns about our compliance with data protection law. You can do so by calling the ICO helpline on 0303 123 1113 or via their [website](#).

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine reason to need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will inform you and the ICO of any personal data breaches in line with our legal obligations.

### **Changes to the privacy notice**

We keep our privacy notices under regular review. This privacy notice was published on 22<sup>nd</sup> May 2018 and last updated on 29<sup>th</sup> June 2020.

We may change this privacy notice from time to time, when we do, we will inform you via direct email or in the Newsletter.