

## **Scottish Athletics Limited**

### **Privacy Notice for Individual Members (Athletes, Joggers, Coaches, Jog Leaders, Technical Officials, Honorary Life)**

#### **Introduction**

We are committed to respecting your privacy. This Privacy Notice explains in detail the types of personal data we may collect before, during and after your membership with us. It also explains how we will store and handle that data, and how we keep it safe. This notice explains how we comply with the law on data protection and what your rights are.

This notice applies to you if you are either:

1. An individual participant in the sport of athletics who has registered an interest in participating in the sport and/or whose membership details we have collected from one of our affiliated clubs, groups, schools, universities, event organiser or other third-party referral; or
2. A coach, Jog Leader, technical official or Honorary Life Member (HLM) who has registered with Scottish Athletics to find out more about training courses, accreditation services or to serve at our events.

References to “we”, “our” or “us” in this privacy notice are to Scottish Athletics Limited (company number SC217377), registered at Caledonia House, South Gyle, Edinburgh, EH12 9DQ.

#### **What we do**

Scottish Athletics Limited (**scottishathletics**) is the National Governing Body for Athletics in Scotland. A company limited by guarantee (established 2001), **scottishathletics** is affiliated to UK Athletics, or any respective successor, which is in turn affiliates to World Athletics and the International Paralympic Committee, or any respective successor.

We are in practice an organisation made up of our member clubs, offering opportunities for people of all ages to try out, train, embrace and compete in the various disciplines of athletics – and at all levels from jogging (through our **jogscotland** network) to Commonwealth and Olympic Games levels. As an organisation, our structure and business is to a large degree controlled by the Memorandum and our Articles of Association.

#### **What we need**

**scottishathletics** will be a “controller” of your personal information provided to us.

When you register as a member of **scottishathletics** or **jogscotland** or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we may ask you for the following personal information:

- contact details – information that allows us to contact you directly such as your name, postal address, email address, and telephone numbers;
- personal contact details that you volunteer to provide for emergency contacts;
- date of birth;
- details of any relevant memberships, qualifications and or licences previously or currently held;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;

- payment details you provide to us so that we may receive or make payments to you, and the details and records of those financial transactions with you;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- equality information – disability, gender reassignment, race or ethnicity, religion or belief, sex and sexual orientation;
- records of your attendance at any events or competitions hosted by us and our partnership organisations and other event organisers;
- identification documents such as passport, birth certificate, and utility bills;
- any disciplinary and grievance information; and
- images in video and/or photographic form.

### Athletes and Joggers

If you are an athlete or jogger who has registered an interest in participating in the sport, particularly to compete in the sport, you may also provide us with or we may obtain the following additional personal information from you:

- sizes for competition kit;
- details of any club(s) or group(s) and/or education establishment membership;
- details of next of kin, family members and coaches/Jog Leaders;
- records and assessment of any rankings (including Power of 10 membership number), competition results, details regarding events attended and performance (including that generated through athlete pathway programmes and from other Athletics Governing Bodies); and
- any details required for the purposes of awarding scholarships, grants or other support.

### Coaches, Jog Leaders, Technical Officials and HLMs

If you have registered with us to receive more information about our coaching/teaching accreditation/qualification schemes and/or any of our education and teaching programmes you may also provide us with or we may obtain the following additional personal information from you:

- any coaching code or official number including any Unique Registration number (URN);
- your current affiliated club, group or other organisation (if applicable);
- coaching/teaching qualification and/or officiating history; and
- accreditation/qualification start and end date.

If you are providing us with details of next of kin, family members, coaches/Jog Leaders and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights” section below.

### **Why we need your personal information – contractual purposes**

We need to collect our members’ personal information so that we can manage your membership.

We will use our members’ personal information to:

- administer your membership with us and to manage our relationship with you, including dealing with payments and any support, service or product enquiries made by you;
- provide you with core membership services, including insurance and event entry; and

- send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits, such as advanced ticket information, competitions and events, partner offers and discounts and any updates on athletics.

If you do not provide us with all of the personal information that we need to collect, then this may affect our ability to offer the above membership services and benefits.

### **Why we need your personal information – legitimate purposes**

We also process our members' personal information in pursuit of our legitimate interests to:

- promote and encourage participation of **scottishathletics** by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed for live streaming purposes and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- provide competition opportunities with **scottishathletics** by accepting and managing entries for our competitions, including team selections and approving eligibility requests, and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in **scottishathletics** by monitoring members' engagement and participation through attendance and inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our annual awards dinner, which includes asking our clubs to nominate individuals for awards and short listing such individuals to select the winners, who we will then contact by email;
- invite our members as VIPs to reception events by email and post, and to provide names and email addresses to venues where requested for their own legitimate purposes;
- ensure membership is up to date for the purposes of competition in leagues, **scottishathletics** licenced events, open graded events and clubs;
- retaining personal data for historical and statistical purposes such as competition results;
- assist in delivering new programs for strategic development of the sport; and
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to **scottishathletics**. We will use your personal information to investigate complaints, to suspend membership and take disciplinary action where appropriate.

#### Athletes and Joggers

- to make decisions about your progression and development through any athlete pathway programme;
- to administer and monitor your attendance at events and competitions;
- to arrange for any trip or transportation to and from an event;
- to administer any drug and alcohol testing;
- to gather evidence for possible grievance and disciplinary processes;
- to use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate; and
- to assess your eligibility for and to provide any scholarship funding and/or grants;

#### Coaches, Jog Leaders, Technical Officials and HLMs

- to administer your attendance at any courses or events you sign up to;

- to conduct performance reviews, managing performance and determining performance requirements;
- to make decisions about your progression and accreditation status;
- to gather evidence for possible grievance and disciplinary processes;
- to administer any drug and alcohol testing;
- to comply with legal obligations, for example, regarding people working with children or protected adults to comply with our safeguarding requirements;
- to use information about your physical or mental health or disability status, to ensure your health and safety and to assess your fitness to participate;
- to assess your eligibility for and to provide any scholarship funding and/or grants;
- to administer the leader, coach and officials (Levels 1-3) licence scheme; and
- to arrange for any trip or transportation to and from an event.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at [dataprotection@scottishathletics.org.uk](mailto:dataprotection@scottishathletics.org.uk). If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

#### **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our members for the purposes of complying with our obligations under:

- The Protection of Vulnerable Groups (Scotland) Act 2007 to check that our volunteers are able to undertake paid or unpaid regulated work with children and protected adults. We are a registered body with Disclosure Scotland and the identified suitability decision maker for all of our affiliated clubs. We manage the PVG application process, any subsequent decisions relevant to the disclosure process and make all suitability decisions relating to PVG;
- The Companies Act 2006 to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member;
- our **sportscotland** and Scottish Government regulatory requirements to report on the size, achievements and profile of our members; and
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

#### **Why we need your personal information – equality monitoring requirements**

The Equality Act 2010 identifies nine protected characteristics: age, sex, gender reassignment, disability, race, sexual orientation, religion or belief, marriage and civil partnership, and pregnancy and maternity. Additional equality data might also include data such as postcode to identify SIMD (Scottish Index of Multiple Deprivation) and/or rural exclusion.

We are required to use our members' personal information relating to your age, disability, gender reassignment (trans status) race/ethnicity, religion or belief, sex, sexual orientation, SIMD (postcode) for equality monitoring purposes as required by **sportscotland** and as part of our continual internal assessment process for the Moving to Inclusion Framework.

We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

### **Other uses of your personal information**

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

We may be asked by our member clubs to collect and store personal information about their individual members. Where we do this, the clubs have a responsibility as “controllers” to provide their members with privacy notices and we will not use such personal information for any other purpose.

### **Who we share your personal information with**

If your personal information is included in any images or videos we take, or are taken on our behalf, we may share this with event or official project partners, including but not limited to Vinco, Brand Oath, Team Scotland and **sportscotland**, for promotional and/or journalistic purposes. We may also use such images and videos across the **scottishathletics** and **jogscotland** program media channels and social media platforms, including but not limited to our websites, our You Tube channel, Facebook pages and Twitter feeds as well as Instagram and Snapchat.

We may also share your information with the likes of Team Scotland and UK Athletics for the purposes of award nominations and selection.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations, such as assisting with the investigation and prevention of crime and the protection of national security, and with external audit requirements. Organisations include, but are not limited to, the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and protected adults, local authorities, such as social work, education (including named persons).

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

**scottishathletics** employs third party suppliers to provide services, for example, payment processors, promotional advisors, contractors or suppliers and IT services (including, websites and web portal platforms and video). These suppliers may process personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it in accordance with existing legislation on data protection. In the event we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes. If we stop using their services, any personal data held by them will be deleted.

We may also share your personal information with our supply chain partners and sub-contractors, such as couriers, travel and logistics providers, printing and event fulfilment providers, for example chip timing companies and clothing suppliers.

We may also be required to share personal information relating to health in order to undertake activities to eliminate doping at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport. Other parties with whom we may share athletes’ health information are UK Athletics, Team Scotland and **sportscotland**, for the purpose of providing information on an athletes’ fitness.

Specific funding organisations may also be passed information for processing grant applications, such as SportsAid and Winning Students.

We may also share your information with other governing bodies or districts for the sports covered by our organisation to allow them to properly administer the sport on a local, regional, national and international level, and with UK Athletics to maintain your records within and access to database and website systems.

#### **Fair Processing Notice (FPN): Safeguarding**

The Data Protection Act 2018 requires that you are informed about how your personal information will be used. For the purposes of safeguarding, wellbeing and safe sport matters in Scotland, if **scottishathletics** or your club receives information of concern; **scottishathletics** or your club may share information about you with each other, as well as UK Athletics and where relevant other governing bodies in the UK. This may be related to, but not exclusively restricted to, where the organisation sharing the information has been alerted to circumstances that might affect your status as a member of the PVG scheme for regulated work/regulated roles with children or protected adults. Or your suitability to carry out the regulated work/regulated role for which you have applied/been appointed or already doing. In the event such sharing is deemed necessary, it will normally only be carried out between the Safeguarding Officers in the Club, Governing Body, and those appointed representatives within the relevant partner organisation.

#### **How we protect your personal information**

Your personal information is stored on our electronic filing system and our servers based in the EU, and is accessed by our staff and volunteers for the purposes set out above. In some circumstances we may use third parties located outside the EU, but will ensure they are signed up to the "Privacy Shield".

We are required to transfer your personal information outside the EU for the purposes of entering competitions, booking travel arrangements for training camps and competitions. Where your personal information is transferred outside the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

#### **How long we keep your personal information**

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for six years. We will retain information on your qualifications indefinitely to prove your level of qualification.

We will keep certain personal information of members for longer to confirm your identity, when you were a member of **scottishathletics** and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members or in the event of a claim against **scottishathletics**.

#### **Your rights**

You can exercise any of the following rights by writing to us at Data Protection, **scottishathletics**, Caledonia House, South Gyle, Edinburgh, EH12 9DQ, or [dataprotection@scottishathletics.org.uk](mailto:dataprotection@scottishathletics.org.uk)

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by **scottishathletics** will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at [www.ico.org.uk](http://www.ico.org.uk)