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# Who does this policy apply to?

This Policy is for and applies to:

* Ascension Eagles Cheerleaders
* Talent Central Cheer & Dance.

In this document the above will jointly be referred to as “The Group”, “We” or “Us”.

This Policy applies to all:

* employees of The Group
* employees of contractors working for The Group
* [participants](#_heading=h.1t3h5sf) at The Group
* professional advisers to The Group
* volunteers working with The Group (including trustees).

To ensure we meet our legal obligations, every person working for or representing The Group has a personal responsibility to uphold the requirements of and procedures set out in this policy.

Wherever this document uses the expression “parent” or “parents” this includes the responsible adult/s who is/are the principal caregiver/s for a child.

# Definition of terms used in this policy

For the purposes of this policy:

| Personal data | Personal information related to an identified or identifiable person, (also known as the “[data subject”](#_heading=h.2et92p0).)  Personal information includes all data which are (or can be) assigned to a person in any kind of way. For example, the telephone, credit card or personnel number of a person, account data, number plate, appearance, customer number or address are all personal data. |
| --- | --- |
| Data subject | The data subject is any person who is identifiable if they can be directly or indirectly identified, especially by reference to an identifier such as a name, an identification number, location data, an online identifier or one of several special characteristics, which expresses the physical, physiological, genetic, mental, commercial, cultural or social identity of these natural persons. |
| Participant | Any person who uses the benefits, facilities and services provided by The Group, including personal participation in any squad or any programme run by The Group; membership by an immediate family member in any squad or any programme run by The Group; or access to any facility owned, leased or operated, either permanently or temporarily, by The Group. |

# What this policy covers

We expect this policy to be referred to by the parents of our participants, to find out why we collect personal data and how we keep it safe. However, the policy also applies to our employees and others, as listed in the entitled “[Who does this policy apply to?](#_heading=h.1y810tw)”.

This policy aligns to the [UK Data Protection Act 2018](https://www.gov.uk/data-protection), which is the UK’s implementation of the General Data Protection Regulation (GDPR).

# Why this policy is important

Every organisation in the UK which collects personal data has a legal duty to uphold the requirements of the UK General Data Protection Regulation. This policy sets out our approach and how we ensure we meet those legal requirements.

# The aims of this policy

The purpose of this policy is to explain:

* **what** type of data we collect
* **why** we collect data
* **how** we use the data we collect
* **who** might see your data
* **when** your data is deleted.

# What personal data we collect

* We collect information about you when you register to participate in one of The Group’s programmes. This information includes name, address, email, phone and the participant’s name and age. It may also include other relevant information that you choose to share with us (e.g. regarding a medical condition or disability).
* We need this information because our programmes are age and ability based and we need to ensure that your child is being trained at the appropriate level and that we are making the right provisions for their wellbeing.
* We also collect survey responses from your child, which may include their opinion on The Group, its services and their impact.

# How and why we use your personal data

We take your privacy extremely seriously and will only use your personal information in the following ways:

* To contact you regarding your child’s participation in The Group’s activities;
* To ensure the safety of your child (e.g. when you tell us about any relevant medical conditions your child has of which our employees need to be aware - such as an allergy or relevant disability);
* For payment of fees for participation in these activities;
* To record attendance;
* To measure the impact of our services;
* To send you details of upcoming events; or
* To update you with news and information relevant to you or your child.

Regardless of the reason for us holding personal information, we will store it securely and we will **never** sell or share your data with any third-parties purely for marketing purposes.

# Who sees and uses your data

Employees of The Group, who work with you and your child, are given access to your personal information in order to support the participants.

In addition to our own staff, we may need to share your information with other organisations we work with (e.g. event companies for cheerleading competitions), so that we can provide our services to you.

We only work with trusted third parties, and the information provided to those third parties is limited to name, date of birth, gender and email address. This is necessary to enter athletes for events and competitions to ensure that they are in the correct divisions.

When assessing the effectiveness or measuring the impact of our services we will use anonymised data, unless participants have given their permission to be identifiable.

In exceptional circumstances, it may be necessary for members of our Board of Trustees to have access to your personal information (e.g. to investigate a complaint).

# Access to your data and making corrections

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact The Director (email: [director@ascensioneagles.com](mailto:director@ascensioneagles.com)).

There are additional contact details in the [How to contact us section](#_heading=h.1mrcu09) below.

We want to make sure that any personal information we hold is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

# Deletion of your data

If you leave The Group (e.g. as an employee or a parent/participant) any personal information you have provided to us will be archived for 90 days from the date you leave us.

At the end of the archive period your data will be deleted, except:

* where there is a statistical, legitimate and lawful reason for us to continue to hold the data (eg it relates to an incident) - *or*
* you have re-joined The Group within the archive period.

# How to contact us

Please contact us if you have any questions about our data protection policy or the information we hold about you. You can do this by:

| Sending an email to: | director@ascensioneagles.com |
| --- | --- |
| Writing to us at our registered address: | Ascension Eagles Cheerleaders Ascension Church Centre Baxter Road Custom House London E16 3HJ |

# Helpful external sources of advice

| The Information Commissioner’s Office (ICO) | The Information Commissioner’s Office is the UK’s independent authority, set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.  <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/> |
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# Contact information

| The Director: | Angela Green |
| --- | --- |
| Contact no:  The Director – email: | 07854 487309  [director@ascensioneagles.com](mailto:director@ascensioneagles.com) |
|  |  |
| Chair of Board of Trustees: | Sue Winston |
| Contact no:  Board of Trustees - email: | 07975 688644  [trustees@ascensioneagles.com](mailto:trustees@ascensioneagles.com) |

# Policy updates and next review date

This policy will be reviewed every year in May, or whenever there is a major change in the organisation, in relevant legislation or relevant legislation or any changes in the cheerleading industry.

| **This policy was updated on:** | 29 May 2023 |
| --- | --- |
| **Updated by:** | Paula Brown, Community Manager |
| **Reviewed by:** | Angela Green, The Director |
| **Other reviewers:** | Sue Winston, Chair of Board of Trustees |
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| **Approved by the Board:** | 30 May 2023 |
| **Next review due:** | May 2024 |
| **To be reviewed by:** | Angela Green, The Director |
| **Review to be approved by:** | The Board of Trustees |

# The category of this policy

This policy is categorised as:

| **Category** | **Description** |
| --- | --- |
|  | This document is publicly available and is published on the AEC website |

# 16. Change log

The following changes have been made to this policy

| **Date** | **Section** | **Description** |
| --- | --- | --- |
| 29 May 2023 | Front cover | Updated date under “Last updated” |
| Table of contents | Added Change log and update ToC to reflect this change |
| 5 | Deleted “... about you” from “Why we collect data ~~about you~~” to make this relevant to anybody who is reading this policy (whether or not we collect data about them) |
| 9 | Changed the link to point to the named relevant “How to contact us” section |
| 12 | Fixed broken link to the ICO website |
| 14 | Updated review date and 2023 reviewers |
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