Women First Team Privacy Notice

1. Who We Are

Birmingham City Women Football Club Limited ("we", "us", "our") processes personal data relating to players, parents/guardians, staff, and visitors as part of operating our Womens First Team.

This privacy notice applies all detailed in the categories of individuals

We are committed to protecting personal data and ensuring compliance with UK GDPR, particularly in relation to children, safeguarding, and high-risk processing.

Data Controller: Birmingham City Women Football Club Limited
Address: St Andrews @ Knighthead Park, Cattell Road, Birmingham, England, B9 4RL
Data Protection Officer: dpo@bcfc.com

2. What Personal Data We Collect

We collect and process personal data as part of our Record of Processing Activities (Article 30 UK GDPR).

a. Identification & Contact Data

- Name, date of birth, age group
- Address, nationality
- Contact details (email, phone)
- IP Address and Cookies

b. Football & Performance Data

- Match statistics, training data, KPIs
- Technical and tactical analysis
- Video footage from training and matches
- GPS, biometric and performance metrics
- Performance benchmarking and pathway progression data
- Menstrual health and female athlete-specific data

c. Coaching & Staff Data

- Employment and role information
- Qualifications, CPD and training records
- Session plans, reviews and observations
- Behavioural and performance monitoring
- Video/audio recordings of coaching sessions

d. Education & Player Development

- School details, attendance and progress
- Individual Development Plans (IDPs)
- Behavioural and attitude assessments

e. Medical, Health Data or Other Special Category

- Injury and illness records
- Physiotherapy notes and rehabilitation
- Mental health and wellbeing data
- Dietary, fitness and growth data
- Biometric and physiological data
- Psychology data
- Body composition, fitness, and nutrition data
- Religion
- Ethnicity/Race
- Fitness testing, workload monitoring, and readiness data

f. Safeguarding Data (High Sensitivity)

- Welfare observations and case records
- Incident reports and risk assessments
- Safeguarding referrals and investigations
- DBS and background information (staff)

g. Operational & Administrative Data

- Player registration and governing body data
- Contracts, eligibility and disciplinary records
- Travel, tours and accommodation data
- Kit allocation and logistics
- Images, photography and media

h. Scouting & Recruitment Data

- Scouting reports and performance assessments
- Video, analytics and benchmarking profiles
- Social media and publicly available data
- Previous clubs and career history
- Trialist data, recruitment assessments and talent pathway records

i. Parents & Guardians

- Contact details and emergency contacts
- Welfare and safeguarding communications
- Consent records

j. Payroll & HR Data Where applicable

- Salary, bank, tax and pension data
- Employment contracts and performance records
- Training, disciplinary and HR management data

k. CCTV & Security Data

- CCTV recordings across academy sites
- Access logs and incident footage

l. First Team Football Administration Data

- Player registration and eligibility data
- Contract and employment information
- Immigration, visa, and right-to-work documentation
- Disciplinary records (cards, suspensions, fines)

- Match eligibility and squad submission data
- Agent and representation details
- Fitness status summaries and availability reporting (administrative level)

3. How We Use Your Data

We process personal data for the following purposes:

Player Development & Performance

- Analyse performance and improve player development
- Track progression,benchmarking and talent pathways
- Support coaching and tactical decisions

Coaching & Workforce Management

- Manage coaching delivery and performance
- Provide training and CPD
- Monitor behaviour and coaching standards

Education & Player Support

- Deliver education programmes
- Manage attendance and development plans
- Support welfare and personal development

First Team Football Operations

We process personal data to:

- Manage player contracts and employment relationships
- Register players with leagues, governing bodies, and competitions
- Manage match eligibility, squad submissions, and compliance
- Administer transfers, loans, and player registrations
- Ensure immigration and work permit compliance
- Manage disciplinary processes and regulatory requirements

Medical & Performance Management

- Provide medical & psychological care and rehabilitation
- Monitor fitness, injuries and wellbeing
- Manage anti-doping and health compliance
- Assess injury risk, physical readiness and return to play decisions

Safeguarding & Welfare

- Protect children and vulnerable individuals
- Manage safeguarding concerns and incidents
- Record, assess and manage safeguarding cases in line with statutory and football regulations

Operations & Administration

- Register players with governing bodies
- Manage contracts, travel, tours and logistics, matchday and training operations
- Administer kit, communications and systems

Scouting & Recruitment

- Identify and assess talent
- Support recruitment and selection decisions
- Analyse players using data and video
- Manage trialist processes and recruitment pathways

HR, Payroll & Training

- Manage employment and payroll
- Deliver staff training (including safeguarding)
- Maintain compliance with employment law

Performance & Coaching Analysis

We use video and analytics tools to:

- Review matches and training
- Support performance analysis
- Improve coaching delivery

AI & Profiling

We may use AI tools for:

- Performance benchmarking
- Recruitment analysis
- Coaching evaluation

Safeguards include:

- Human oversight
- Ability to challenge decisions
- Transparent use of profiling

CCTV & Security

We use CCTV to:

- Ensure safety of players, staff and visitors
- Prevent and detect crime
- Support investigations and safeguarding
- Protect individuals and facilities
- Monitor site access
- Support safeguarding and investigations

Safeguards:

- No cameras in private areas
- Clear signage in place
- Restricted access to footage
- Proportionate use only
- CCTV footage may be shared with law enforcement where required.

4. Lawful Bases for Processing

We rely on multiple lawful bases depending on the activity:

- **Article 6(1)(a) Consent** – photography, trials, optional processing
- **Article 6(1)(b) Contract** – academy participation and employment
- **Article 6(1)(c) Legal obligation** – safeguarding, FA/WSL rules, HMRC
- **Article 6(1)(e) Public task** – certain regulatory/anti-doping functions
- **Article 6(1)(f) Legitimate interests** – performance, recruitment, operations

Where we rely on legitimate interests, we ensure that our processing is necessary and proportionate and that the rights and interests of individuals are not overridden.

Please Note:

Consent – Players Under 18

Where consent is relied upon:

- Consent is obtained from parents/guardians
- Players are involved where appropriate
- Consent can be withdrawn at any time

However, some processing does **not rely on consent**, including:

- Safeguarding
- Legal obligations
- Security and CCTV

For special category data:

- **Article 9(2)(a) Explicit consent** – where required
- **Article 9(2)(b) Employment** – player/staff data
- **Article 9(2)(g) Substantial public interest** – safeguarding
- **Article 9(2)(h) Health care** – medical and rehabilitation
- **Article 9(2)(j) Research** – performance

5. Who We Share Data With

Internal

- Coaches and club staff
- Analysts and performance teams
- Medical and safeguarding staff
- Education staff
- HR, payroll and finance
- Senior management

External

- Football governing bodies (FA, WSL, UEFA, FIFA)
- League organisers and competition authorities
- Other football clubs
- National Teams
- Player agents and representatives
- Immigration and government authorities
- Medical providers, hospitals, and specialists
- Anti-doping organisations
- Insurance providers
- Professional advisers (legal, regulatory, medical)

Approved data processors who provide:

(All processors operate under written data processing agreements in accordance with Article 28 UK GDPR.)

- Core Data Storage, Communication and Collaboration Systems
- Performance Analysis and Video Systems
- Sports Science and Athlete Monitoring Systems
- Medical and Health Record Systems
- Safeguarding and Welfare Systems
- Player Registration and Governance Systems
- Scouting and Recruitment Systems
- Education and Player Development Systems

- Finance and Administration Systems

Safeguarding Sharing

Where necessary, data may be shared with:

- Police and law enforcement
- Local authorities (LADO)
- Social services and safeguarding agencies
- Governing bodies

Sharing with Players & Parents

We share relevant data with:

- **Players:** performance, coaching, development data
- **Parents/guardians:** progress, safeguarding, medical and operational updates

6. International Transfers

Where data is transferred internationally, appropriate safeguards such as UK adequacy regulations, UK IDTA and the Addendum and/or EU Standard Contractual Clauses (SCCs) are in place.

7. Data Retention

We retain personal data based on our Retention Policy as follows:

- Player and operational data: typically 7 years after leaving
- Medical data: Adult player data will be retained for 8 years after leaving the Club. Data relating to minors will be retained until the player reaches age 26, or for 8 years after leaving the Club if whichever is later, where the player moves from minor to adult while at the Club.
- Psychology data will be retained for 20 years after last contact
- Scouting data: up to 3–6 years depending on relevance
- Payroll/HR: 7 years (longer for pensions)
- Photography/travel: 1 year

- CCTV: up to 30 days unless required
- Safeguarding records: extended retention in line with safeguarding obligations up to 75 years

8. Data Security

We protect data using:

- Encryption and secure systems
- Role-based access controls
- Restricted access to safeguarding data
- Data minimisation and retention controls

9. Your Rights

You have the right to:

Right to Be Informed

You have the right to know how and why your personal data is used.

This privacy notice explains what data we collect, how we use it, who we share it with, and how long we keep it.

Right of Access

You have the right to request a copy of the personal data we hold about you (often called a "Subject Access Request").

This allows you to understand how your data is being used and check that it is being handled lawfully.

Right to Rectification

You have the right to ask us to correct or update any personal data that is inaccurate or incomplete.

For example, this could include incorrect contact details, medical information, or player records.

Right to Request Erasure (Where Applicable)

You can ask us to delete your personal data in certain circumstances, for example:

- Where the data is no longer needed
- Where you have withdrawn consent (if consent was used)

However, this is not an absolute right. We may need to keep some data, for example for:

- Safeguarding purposes
- Legal or regulatory obligations
- Ongoing academy operations

Right to Restrict or Object to Processing

You have the right to:

- Restrict processing – ask us to limit how we use your data in certain situations
- Object to processing – where we rely on legitimate interests, you can object if you feel your rights outweigh our reasons for processing

We will consider your request and respond in line with data protection law.

Right to Data Portability

Where applicable, you have the right to receive your personal data in a structured, commonly used format and request that it is transferred to another organisation.

This typically applies where:

- Processing is based on consent or contract
- The data is processed electronically

Right to Withdraw Consent

Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time.

Withdrawing consent will not affect the lawfulness of any processing carried out before consent was withdrawn.

For example, you may withdraw consent for:

- Email marketing communications
- SMS marketing communications
- Direct marketing communications
- Personalised marketing activities
- Participation in surveys or promotional activities
- The use of photographs, videos, or other media content where consent is the lawful basis for processing
- Other optional activities where consent has been provided

Once consent is withdrawn, we will stop processing your personal data for the relevant purpose unless another lawful basis applies.

You can withdraw consent at any time by:

- Updating your communication preferences within your account (where available)
- Using the unsubscribe link included in marketing communications
- Contacting us at **dpo@bcfc.com**
- Contacting the relevant Club department managing the activity concerned

We will action requests to withdraw consent as soon as reasonably practicable and in accordance with applicable data protection laws.

Right to Challenge Automated Decisions

You have the right not to be subject to decisions based solely on automated processing (including profiling) that have significant effects on you.

Where we use analytics or AI tools (e.g. for performance or scouting):

- Decisions are not made solely by automated systems
- Human oversight is always applied
- You can request an explanation or challenge decisions

10. Data Sources

We obtain data from:

- Players and parents/guardians
- Coaches, academy staff, and club employees
- Schools, colleges, and education providers
- Football governing bodies and leagues (e.g. FA, WSL, UEFA, FIFA)
- Other football clubs (including transfers, loans, and trials)
- Scouts, recruitment networks, and analytics providers
- Player agents and representatives
- Medical professionals and healthcare providers (including NHS and private practitioners)
- Technology platforms and operational systems used by the Club
- Publicly available sources, where relevant to football activity, including:
  - Match footage
  - Media coverage
  - Performance data and statistics
  - Social media content

11. Categories of Individuals

- Players (including trialists and former players)
- Parents and guardians
- Staff (coaching, medical, education, safeguarding, and operations)
- Student Placements
- Scouts and recruitment staff
- Visitors and individuals involved in incidents or safeguarding matters

12. Complaints & Subject Access Requests

Complaints will be dealt with by the Data Protection Officer dpo@bcfc.com and will be responded to within 30 days. If you are not satisfied with the response you should refer your complaint to the ICO https://ico.org.uk/concerns

13,Do We Use Cookies And Other Tracking Technologies?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

14. Updates

This notice may be updated periodically.