



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Safeguarding Privacy Notice

1. Who We Are

Birmingham City Football Club Limited/ Birmingham City Women Football Club Limited (“we”, “us”, “our”) processes personal data relating to players, parents/guardians, staff, contractors, volunteers, supporters, visitors, and members of the general public.

This notice applies to all safeguarding-related processing across the Club, including:

- Men’s and Women’s First Teams
- Academy (Boys and Girls)
- Staff and workforce
- Matchday and stadium operations
- Community and public-facing activities

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

Data Controller: Birmingham City Football Club Limited/ 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 to support safeguarding, welfare, and public safety:

a. Identification & Contact Data

- Name, date of birth, age group
- Contact details (email, phone, address)
- Parent/guardian and emergency contacts
- Ticketing/attendance information (where applicable)
- IP Address and cookies



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

b. Safeguarding & Welfare Data

- Welfare concerns and safeguarding observations
- Incident reports and case records
- Risk assessments and safeguarding referrals
- Behavioural observations and wellbeing monitoring
- Case management documentation and outcomes

c. Operational & Contextual Data

- Attendance, travel, supervision, and host arrangements
- Education and school details
- Employment or role-related information
- Communication records (emails, reports, logs)

d. CCTV, Security & Monitoring Data

- CCTV footage (training sites and stadium)
- Body-worn camera footage
- Access control logs and security monitoring

e. Incident & Emergency Data

- Accident and incident reports
- Witness statements and investigation records
- First aid and emergency response information



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

3. Special Category Data (Where Relevant)

Due to safeguarding obligations, we process **highly sensitive data**, including:

Health & Medical Data

- Injury, illness, and treatment records
- Mental health and wellbeing information
- Emergency medical data and care records

Equality, Diversity & Inclusion (EDI) Data

- Ethnicity and racial or ethnic origin
- Disability and accessibility requirements
- Religion or belief (where relevant)

Safeguarding-Specific Data

- Welfare notes and safeguarding case files
- Psychological and behavioural observations
- Risk assessments and investigation outcomes

Biometric & Technical Data (Where Applicable)

- Biometric identifiers (e.g. access systems)
- Video/images which may reveal sensitive data

Special category data is handled with enhanced safeguards:

- Restricted and role-based access
- Data minimisation and purpose limitation
- Secure storage and encryption
- Strict confidentiality controls

4. How We Use Your Data



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

We process data for safeguarding purposes across all areas of the Club:

Safeguarding & Welfare

- Protect children and vulnerable individuals
- Identify and manage safeguarding concerns
- Record and investigate welfare issues

Risk Management

- Conduct safeguarding risk assessments
- Monitor wellbeing and behavioural indicators
- Prevent harm, abuse, or neglect

Incident & Case Management

- Record and investigate incidents
- Manage safeguarding referrals and casework
- Maintain safeguarding records

Medical & Emergency Response

- Provide first aid and emergency care
- Share data with medical professionals where necessary

Safety & Security

- Ensure safety across stadiums and training sites
- Monitor crowd safety and access control
- Prevent and detect crime or disorder

Compliance & Governance

- Meet legal, regulatory, and safeguarding requirements
- Comply with FA, league, and statutory obligations

CCTV & Security

- We use CCTV to:



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

- 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.

5. Lawful Bases for Processing

We rely on:

- Article 6(1)(c) Legal obligation – safeguarding duties

For special category data:

- Article 9(2)(g) – substantial public interest (safeguarding)
- Schedule 1, Part 1, Paragraph 18 (DPA 2018) – safeguarding
- Article 9(2)(h) – health and social care

Safeguarding processing is not based on consent, as it is required for legal and protective purposes.

6. Who We Share Data With

Safeguarding data is shared on a strict need-to-know and lawful basis across all Club operations and public environments.



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Internal

- Safeguarding and welfare teams
- Coaches and staff across Men's, Women's, Boys', and Girls' teams
- Medical, psychology, and wellbeing teams
- Education and player support staff
- HR and senior management
- Stadium operations, security, and safety teams

External

- Police and law enforcement
- Local authorities and safeguarding bodies (including LADO)
- Social services and safeguarding agencies
- NHS and emergency services
- Schools and education providers
- Football governing bodies and regulators
- Legal advisers and insurers

This includes safeguarding involving:

- Players and staff
- Children and vulnerable individuals
- Matchday attendees
- Visitors and the general public

Technology Providers (Data Processors)

We use systems to support safeguarding across all club environments:

- Safeguarding and case management systems
- Incident reporting and risk management platforms



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

- CCTV, body-worn video, and security systems
- Communication and collaboration platforms
- Medical and welfare record systems
- Access control and site security tools
- Education and welfare monitoring systems

These providers:

- Act as data processors (Article 28 UK GDPR)
- Process data only under our instructions
- Are subject to strict contractual and security controls

Safeguarding-Specific Sharing

Where there is a risk of harm, data may be shared urgently with:

- Police
- Safeguarding authorities
- Emergency services
- Regulatory bodies

This applies to all individuals, including the general public, and does not depend on consent.

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:



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

- Safeguarding records: retained up to 75 years where required
- Incident reports: retained in line with legal requirements
- CCTV footage: typically retained up to 30 days unless needed

Extended retention reflects **long-term safeguarding obligations and legal accountability**.

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.



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

10. Data Sources

We obtain data from:

- Individuals (players, parents, staff, public)
- Staff and safeguarding officers
- Schools and education providers
- Medical professionals
- CCTV and security systems
- Police and authorities

11. Categories of Individuals

- Players (Men's, Women's, Boys', Girls')
- Parents and guardians
- Staff, volunteers, contractors
- Matchday attendees and supporters
- Visitors and general public
- Individuals involved in safeguarding concerns

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.