



Data Privacy Policy

Policy year	2026/27
Reviewed	September 2026
Approved by	Black Ice Academy Directors
Next review	September 2027

1. Purpose

This policy sets out how Black Ice Academy manages personal information responsibly and securely. It is an internal governance policy and should be read alongside BIA's outward-facing Privacy Policy/Privacy Notice.

2. Data-protection principles

BIA will process personal information lawfully, fairly and transparently; collect it for specified purposes; limit collection to what is necessary; keep it accurate; retain it only as long as needed; protect it appropriately; and be able to demonstrate compliance.

3. Information BIA may process

- Membership and contact details for athletes and parents/carers.
- Dates of birth, team membership, attendance and competition information.
- Emergency contacts and relevant health, injury, allergy, medication or accessibility information.
- Photographs/video and consent/preferences relating to media use.
- Staff/volunteer recruitment, qualifications, training, safeguarding and DBS-check administration.
- Payments, invoices and transaction records.
- Communications, complaints, incident, accident and safeguarding records.
- Website, platform or system information where applicable.

4. Lawful bases and sensitive information

BIA will identify an appropriate lawful basis under Article 6 UK GDPR for each processing purpose. Where BIA processes special-category information, such as health information, it will also identify an Article 9 condition. Criminal-offence information, including DBS-related information, will only be processed where legally permitted and with appropriate safeguards.

Where required by the Data Protection Act 2018, BIA will maintain an Appropriate Policy Document covering relevant special-category and/or criminal-offence processing.

5. Children's information

Children merit particular protection. Information about children will be handled fairly, proportionately and in ways that reflect their age and understanding. BIA will minimise collection, restrict access and explain relevant uses to parents/carers and, where appropriate, directly to the child in clear language.

6. Security and access

- Access to personal information will be limited to people who need it for their role.
- Accounts and devices used for BIA information should use appropriate passwords/access controls and reasonable security measures.
- Sensitive information should not be stored or shared through personal channels where an approved BIA system is available.

- Paper records containing sensitive information will be kept securely.
- Personal-data breaches must be reported promptly to the Directors so that risk, containment, notification and recording requirements can be assessed.

7. Sharing

BIA will not sell personal information. Information may be shared with service providers, competition/event organisers, governing bodies, insurers, professional advisers, payment providers or public authorities where necessary and lawful. Safeguarding information may be shared without consent where necessary to protect a child or person at risk.

8. Retention and deletion

BIA will maintain proportionate retention arrangements. Information will not be kept for longer than necessary for the purpose, legal obligations, safeguarding, insurance or the establishment/exercise/defence of legal claims. Secure deletion or destruction will be used when retention is no longer justified.

9. Individual rights

Depending on the circumstances, individuals may have rights including access, correction, erasure, restriction, objection, portability and rights relating to certain automated decisions. Requests should be sent to BIA and will be handled under applicable data-protection law.

10. Data protection by design

New systems, forms, apps and processes will be designed with privacy in mind. BIA will consider whether a Data Protection Impact Assessment is required, particularly for processing likely to present a high risk to children or involving sensitive information.

Key references

This policy should be read alongside Black Ice Academy's other safeguarding, conduct, first aid, inclusion and complaints policies. It has been prepared with reference to:

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018, as amended, including changes arising from the Data (Use and Access) Act 2025.
- ICO guidance: Children and the UK GDPR (updated May 2026).
- ICO guidance on data protection by design and default, data minimisation, purpose limitation and special-category data.
- SportCheer England Data Privacy Policy.

Legislation and guidance can change. Black Ice Academy will review this policy at least annually and sooner where law, statutory guidance, governing-body requirements or Academy practice changes.