



PRIVACY NOTICE

Aberdeen Learn to Swim Scheme

Aberdeen LTS [“**ALTS**” or “**the Scheme**”] protects the privacy of its swimmers, lifesavers, parents, teachers, coaches, teaching assistants, volunteers and workers. This Privacy Notice, in conjunction with the Scheme’s Data Policy, explains how ALTS complies with the General Data Protection Regulation [“**GDPR**”].

ALTS comprises the Learn to Swim, Senior and Junior Fitness, and Lifesaving sections. Competitive, Masters, Junior Masters and Waterpolo squad members should refer to the separate Privacy Statement for Aberdeen Amateur Swimming Club [“**AASC**”].

ALTS will be a “**Controller**” of the personal information that you provide to us. In circumstances in which it is necessary to disclose personal data to a third party, that third party becomes the controller of the data.

ALTS may process personal data without individuals’ knowledge or consent, in compliance with this Privacy Notice, where this is permitted or required by law.

ALTS reserves the right to update this Privacy Notice providing such changes are appropriately communicated. ALTS may also notify its swimmers, lifesavers, parents, teachers, coaches, teaching assistants, volunteers and workers in other ways from time to time about the processing of their personal data.

Key definitions

“**Data processing**” is any activity that involves the use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties.

“**Personal data**” are data that identify a living person to whom the data relates or that relate to an identifiable living person.

“**Special category data**” are particularly sensitive data including data related to physical or mental health conditions, sexual life, biometric parameters etc.

Fair processing of data

In processing individuals’ data ALTS will adhere to the following principles. Personal data will be:

- Used lawfully, fairly and in a transparent way,
- Collected only for valid purposes that are clearly explained and not used in any way that is incompatible with those purposes,
- Relevant to specific purposes and limited only to those purposes,
- Accurate and kept up to date,
- Kept only as long as necessary for the specified purposes, and
- Kept securely.

ALTS may process special categories of personal data in the following circumstances:

- In limited circumstances, with explicit written consent,
- In order to meet legal obligations,



PRIVACY NOTICE

Aberdeen Learn to Swim Scheme

- When it relates to personal data which are manifestly made public by the individual to whom the data relates,
- When it is necessary for the establishment, exercise or defence of legal claims,
- When it is needed for reasons of substantial public interest, and
- When it is needed for the purposes of preventive medicine or for the assessment of working capacity.

In particular, data about swimmers and lifesavers' physical or mental health, or disability status, may be used to ensure health and safety and to assess fitness to participate and (for lifesavers) compete, to provide appropriate adjustments, and to monitor and manage sickness absence. Data about teachers, coaches, teaching assistants and volunteers' physical and mental health, or disability status, may be used to ensure health and safety, to assess fitness to work and to provide appropriate adjustments, and to monitor and manage sickness absence.

Consent to processing of personal data

ALTS does not require consent from swimmers, lifesavers, parents, teachers, coaches, teaching assistants, volunteers or workers to process most types of personal data.

In limited circumstances, individuals may be asked for written consent to processing. In those circumstances, full details of the information that is sought will be provided and the reason it is needed, so that individuals may carefully consider whether to consent. It is not a condition of membership that individuals agree to any request for consent.

Sessions may be filmed or photographed and images used for promotional, celebratory or developmental purposes including on social media. No images will be used without explicit consent.

Where individuals have provided consent to the collection, processing and transfer of personal information for a specific purpose, they have the right to withdraw consent for that specific processing at any time.

What personal data we need

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

- Name, address, email address, contact telephone number,
- Gender and date of birth,
- Emergency contact details, and
- Participation and membership category details i.e. whether you are a swimmer, a lifesaver, a parent, a teacher, a coach, a volunteer or other worker.

Any health information that is relevant and necessary to protect your interests if you are a swimmer or lifesaver.

We will ask you for the following additional information if you are joining ALTS as a Teacher or Teaching Assistant, Coach or Coaching Volunteer:



PRIVACY NOTICE

Aberdeen Learn to Swim Scheme

- Your SASA number if you have one,
- Details of relevant qualifications and experience,
- Details relating to your status under the Protection of Vulnerable Groups Scheme and you Safeguarding status, and
- Details of referees, if required.

We will record your start date with the Scheme and, throughout your membership of ALTS, we may collect additional data as follows:

For swimmers and lifesavers:

- Your group,
- Details of your progression, and
- (For lifesavers who compete) your RLSS number.

For teacher, coaches, teaching and coaching assistants and volunteers:

- Such data as is required for the completion of a Disclosure check under the PVG scheme,
- Details of your attendance, absences and reasons,
- Your Continuing Professional Development [“CPD”] record,
- Your bank details, hours worked and pay rate (if appropriate), and
- (For committee members) your occupation and status.

Other data that may be collected and retained are:

- Photographs of members,
- Details of any safety cases or incident records,
- Details of disciplinary and capability records,
- Grievance and complaint records, and
- Details of any child/wellbeing protection issues that may arise.

From time to time, such as for team travel events for lifesavers, ALTS may collect additional information in which case a separate Privacy Notice will be issued relating to that data.

Why we need your personal data – contractual purposes

We need to collect our members’ personal data so that we can manage your membership. We will use our members’ personal data to:

- Provide you with core member services, including providing you with learning and developmental opportunities,
- Send you membership communications by email in relation to essential membership services, including but not limited to general meeting notices and voting arrangements, membership renewals, membership fees information, etc., and
- Fulfil our duty or care to you and collect payments.

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.



PRIVACY NOTICE

Aberdeen Learn to Swim Scheme

If you are a teacher, coach, teaching assistant or other worker, we will use your personal data to pay you.

Why we need your personal data – legitimate purposes

We also process our swimmers, lifesavers, parents, teachers, coaches, volunteers or workers' personal data in pursuit of our legitimate interests to:

- Promote and encourage participation in aquatic sports by celebrating participation and success in articles which we may publish for promotional, celebratory and developmental purposes including on social media,
- Monitor and develop participation in aquatic sports by monitoring members' engagement and participation through attendance records and inviting our members to participate in surveys for research purposes,
- Ensure our teachers, coaches and teaching assistants are suitably qualified for their roles,
- Develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child/wellbeing protection requirements,
- Respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations and to deal with such disciplinary, capability, grievance or complaint issues that may arise,
- Respond to any child/wellbeing protection incidents that may arise, including notifying external authorities such as Police Scotland or Social Services where the Scheme's Wellbeing Protection Officer considers this to be in the best interests of a child or other vulnerable person or to protect the Scheme's reputation.

We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Where we process your personal data in pursuit of our legitimate interests, you have the right to object to us using your personal data for the above purposes. If you wish to object to any of the above processing, please contact us at aasc.dataprotection@gmail.com. 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 data – legal obligations

We are under a legal obligation to process certain personal information relating to our swimmers, lifesavers, parents, teachers, coaches, teaching assistants, volunteers and workers for the purposes of complying with our obligations under:



PRIVACY NOTICE

Aberdeen Learn to Swim Scheme

- 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, and hold general meetings, including issuing notices and voting arrangements,
- The Protection of Vulnerable Groups (Scotland) Act 2007 to check that our teachers, coaches, teaching assistants (over the age of 16) and volunteers are able to undertake regulated work with children and vulnerable adults,
- The Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary, and
- Relevant health and safety legislation under which we fulfil our duty of care to you.

Other uses of your personal data

We may ask you if we can process your personal information for additional purposes, for example in the event of team travel to an event for lifesavers. 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.

Who we share your personal data with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, Social Services and Police Scotland for the purposes of reporting accidents and safeguarding children and other vulnerable persons.

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

ALTS employs third party suppliers to provide services, including membership and participation records and audit services. 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 the event that 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.

Where we share your personal data in pursuit of our legitimate interests, you have the right to object to us sharing your personal data for such purposes. If you wish to object to such sharing, please contact us at aasc.dataprotection@gmail.com. If we agree and comply with your objection, this may affect our ability to undertake certain tasks for the benefit of you as a member.

How we protect your personal data

Access to personal data is limited to those teachers, coaches, workers and volunteers who have a business need to know. They will only process personal information on ALTS's instructions and are



PRIVACY NOTICE

Aberdeen Learn to Swim Scheme

subject to a duty of confidentiality. ALTS expects those teachers, coaches, workers and volunteers to take steps to safeguard personal data in line with ALTS's data policy.

Your personal information is stored on our electronic filing systems, on the servers of our third party supplier for membership services 'CoursePro' and on cloud based servers either based in the EU or operated by subscribers to US Privacy Shield, and is accessed by our teachers, coaches and volunteers for the purposes set out above.

If we are required to transfer your personal information outwith the EU (other than to a subscriber to US Privacy Shield) 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 data for

We will only keep your personal data for as long as necessary. Unless you ask us not to, we will review and possibly delete your personal data where you have not renewed your association with us for one year.

We will keep certain personal data for longer in order to confirm your identity, when you were a member of ALTS 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 ALTS.

We have a data register that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at aasc.dataprotection@gmail.com.

Your rights

You can exercise any of the following rights by writing to us at aasc.dataprotection@gmail.com.

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,
- You have the right to request the transfer of personal data to another party, and
- If you wish us to delete your personal information, you may request that we do so.

Any requests received by ALTS 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.