

Orwell Panthers A.C. Data Protection Policy - Draft

Orwell Panthers A.C. collects and uses personal information about members, coaches, parents, volunteers and other individuals who come into contact with the club. This information is gathered in order to enable it to provide athletics and sports training and other associated sporting and fundraising activities. In addition, there may be a requirement from the Athletics Governing body to collect and use information to ensure that the club complies with its statutory obligations.

Sports clubs have a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website. www.ico.gov.uk

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff, coaches, committee members and volunteers involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

What is Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

Data Protection Principles

The Data Protection Act 1998 establishes eight enforceable principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for one or more specified and lawful purposes;
3. Personal data shall be adequate, relevant and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998;
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security;
8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

General Statement

Orwell Panthers A.C is committed to maintaining the above principles at all times. Therefore the club will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
- Ensure our coaches and committee members are aware of and understand our policies and procedures

Complaints

Complaints will be dealt with in accordance with the Club's complaints policy. Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator).

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by the Chair of the Management Committee, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact the Chair of the Management Committee who will also act as the contact point for any subject access requests.

Appendix 1

Orwell Panthers A.C.

Procedures for responding to subject access requests made under the Data Protection Act 1998

Rights of access to information

There are two distinct rights of access to information held by organisations.

1. Under the Data Protection Act 1998 any individual has the right to make a request to access the personal information held about them.

Actioning a subject access request

1. Requests for information must be made in writing; which includes email, and be addressed to the Chair of Management Committee. If the initial request does not clearly identify the information required, then further enquiries will be made.

2. The identity of the requestor must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship to the member. Evidence of identity can be established by requesting production of:

- passport
- driving licence
- utility bills with the current address
- Birth / Marriage certificate
- P45/P60
- Credit Card or Mortgage statement

This list is not exhaustive.

3. Any individual has the right of access to information held about them. However with children, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. The Chair of the Management Committee should discuss the request with the member and take their views into account when making a decision. A child with competency to understand can refuse to consent to the request for their records. Where the child is not deemed to be competent an individual with parental responsibility or guardian shall make the decision on behalf of the child.

4. The Data Protection Act 1998 allows exemptions as to the provision of some information; **therefore all information will be reviewed prior to disclosure.**

5. If there are concerns over the disclosure of information then additional advice should be sought.

Information Access Complaints

Complaints about the above procedures should be made to the Chairperson of the Management Committee who will decide whether it is appropriate for the complaint to be dealt with in accordance with the Club's complaint procedure.

Signed Chairperson.....

Date.....