



## **DATA PROTECTION POLICY**

### **1. Introduction**

This policy applies to the activities of the Wimborne Wagtails (here after referred to as the club). It applies to the committee members and helpers.

The purpose of this policy is to enable the Organisation to:

- comply with the law in respect of the data it holds about individuals;
- follow good practice;
- protect the Club's members, committee and helpers
- protect the Club from the consequences of a breach of its responsibilities.

### **Personal data**

This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data Protection Act, by virtue of not meeting the strict definition of 'data' in the Act.

### **Policy statement**

The Club will:

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held
- provide training and support for the committee and helpers who handle personal data, so that they can act confidently and consistently

The Club recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. In the main this means:

- keeping information securely in the right hands, and
- holding good quality information.

Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, the Club will give individuals as much choice as is possible and reasonable about what data is held and how it is used.

### **Key risks**

The Club has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out or shared inappropriately)
- Unauthorised sharing of information with other organisations
- Insufficient clarity about the range of uses to which data will be put, leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access.
- Harm to individuals if personal data is not up to date.

## 2. Responsibilities

The committee recognises its overall responsibility for ensuring that the Club complies with its legal obligations.

The Chair of the committee is particularly responsible for:

- Briefing the committee on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification (if required)
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors

The Chair may discharge the above responsibilities by supervising the actions of other committee members.

All helpers and committee are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work with the Club.

## 3. Confidentiality

Confidentiality applies to a much wider range of information than Data Protection, for example:

- Information about the club (and its plans, financial affairs, etc.)
- Information about other organisations, since Data Protection only applies to information about individuals
- Information which is not recorded, either on paper or electronically
- Information held on paper, but in a sufficiently unstructured way that it does not meet the definition of a "relevant filing system" in the Data Protection Act.

Information that falls within the scope of the Data Protection Act will always be handled in accordance with the Club's responsibilities.

Where a degree of confidentiality attaches to other information, access will normally be controlled on a strict 'need to know' basis. Where information poses a low risk (for example, lists of suppliers) control will be exercised on a proportionate basis.

The Club has adopted a privacy statement for Data Subjects setting out how their information will be used. (*See later in this document.*) This policy is available on request.

Committee and helpers will be required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities. (*See later in this document.*)

Where anyone within the Club feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done with the authorisation of the Chair or the committee. All such disclosures will be documented.

## 4. Security, Data Recording and Storage

The Club has identified the following risks:

- Committee or helpers with access to personal information could misuse it.
- Committee or helpers could continue to be sent information after they have stopped working for the Club, if their records are not updated promptly.
- Poor web site security might give a means of access to information about individuals.
- Committee or helpers could feel an obligation to share information with other organisations.
- Committee or helpers could be tricked into giving away information, either about members, Committee or helpers, especially over the phone.

Access to information on computer(s) will be controlled and limited to authorised committee members.

The Club will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in as few places as necessary, and all committee members and helpers will be discouraged from establishing unnecessary additional data sets.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.
- Committee or helpers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.
- Archived paper records and data backup files may be stored securely off sight.
- Wimborne Wagtails Swimming Club has established a retention period for all archived paper records and data backup files – 3 years.

## **Subject Access**

Any subject access requests must be referred to the Chair or the committee who will oversee the handling of the request.

Where the individual making a subject access request is not personally known to the person dealing with them their identity will be verified before handing over any information.

The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

The Club is committed to ensuring that in principle Data Subjects are aware that their data is being processed and

- for what purpose it is being processed;
- what types of disclosure are likely; and
- how to exercise their rights in relation to the data.

## **Training**

All Committee Member and Helpers who have access to any kind of personal data will have their responsibilities outlined during their induction procedures. And must read and sign the Club's Privacy Statement.

Reviewed:

January 2016