



# SIDMOUTH & OTTERY HOCKEY CLUB



## DATA PROTECTION POLICY<sup>1</sup>

### Why is Data Protection Important?

Sidmouth & Ottery Hockey Club (the Club) requires members to supply personal information for its efficient and effective running. In accordance with the law, the Data Protection Act 1998 (referred to as the DPA in this document) applies to all organisations and businesses that need to hold any type of personal data.

The Club will adhere to the principles of data protection and the guidelines laid out in this policy. The policy will be applied by Club officials and provides information to members about what they can expect and their rights under the DPA.

### The Data Protection Act

All Club Officials and members must comply with the Club's Data Protection Policy.

There are certain elements of the DPA that everyone must be aware of:

- An authorised use is defined by the purpose for which the data was collected in the first place to those who have a "right and need to know" (in our case the running of the Club). This is another reason to ensure all members fill out a membership form and hence consent to the use of their personal information.
- It is an offence under the DPA to disclose information by which a living person may be identified to unauthorised persons. Disclosures in such instances are authorised only when written consent has been received from the individual. Unauthorised disclosure is a civil offence (and in some unusual circumstances criminal) whether caused carelessly or intentionally.

Club officials are party to members' personal information due to the position they hold in the Club, and are therefore subject to the Act. Therefore you are expected to adhere to professional standards of confidentiality and ensure any procedures are followed. If this is done no problems will occur.

If in doubt about whether or not to disclose information, please request clarification from the Club Secretary.

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<sup>1</sup> The Club's policy on the application of the Data Protection Act 1998 (DPA).

The DPA also gives rights to members to check the completeness and accuracy of information about them that is held by or on behalf of the Club, and if necessary, to have it corrected. This is co-ordinated by the Club Secretary.

## **Data Protection Principles**

The Club recognises our member's expectation that their personal information will be handled with care and in accordance with the law.

The Club Committee, acting on behalf of the Club, regards the lawful and correct treatment of personal information as essential to successful running of the club and in maintaining the confidence of its members.

The Club shall adhere to the eight "Data Protection Principles". These specify that personal data must:

- Be processed fairly and lawfully.
- Be obtained for specified and lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and up to date
- Not be kept any longer than necessary
- Be processed in accordance with the "data subject's" (the individual's) rights
- Be securely kept and destroyed when no longer needed
- Not be transferred to countries outside European Economic area unless country has adequate protection for the individual

## **Data Protection Guidelines**

In addition to the principles the Club will adopt the following specific guidelines as good practice for the protection of our members' personal data:

- Personal data will be collected via the Club membership registration form
- It shall only be used for purposes it was collected for, i.e. the effective and efficient running of the Club
- Data will be held on a secure database, Fixtureslive, managed by the Club Secretary. It will be protected by appropriate security arrangements
- Any data will only be disclosed to authorised Club members, at the discretion of the Club Secretary, on a "need to know basis". All information disclosed in this way shall be managed in accordance with this policy
- Hardcopy and electronic data shall be held securely at all times by the Club official who has been issued with that data, including when the data is taken to training sessions or to hockey matches
- Personal data shall only be disclosed to a third party, i.e. the league or emergency medical services, who have a "right" and "a need to know"
- The data held on any member will be removed from the Club's records if they do not renew their membership the following season and all hardcopy

documents, i.e. old copies of contact details, membership forms etc. will be destroyed securely by the holder.

## **Personal Information Disclosure**

The DPA allows for individuals to be provided with a copy of information held about them by, or on behalf of the Club: on a membership management system, i.e. Fixtureslive, computer, paper, or any other media. Such a request is known as a "Subject Access Request". Wherever possible a member's query will be dealt with informally through a Team's Manager or Captain or, directly by the Club Secretary thus avoiding the need for them to make a formal subject access request.

Care is required to ensure that personal information is not disclosed to third parties without the prior consent of individuals or unless a statutory requirement to disclose information exists.

## **Handling Subject Access Requests**

If a formal subject access request is made it must be passed immediately to the Club Secretary, who will log the request, write to the person confirming receipt and coordinate the Club's response.

Club Members have the right to:

- request a copy of any information held about them
- be informed if no information is held about them
- have inaccuracies corrected or personal information erased where appropriate, within 40 calendar days from receipt of the subject access request.

All communication with the member in respect of the subject access request will be channeled through the Club Secretary.

## **Disclosure of Information**

Data concerning a Club Member's private affairs will not be supplied to any person either within or outside of the Club, unless the Club is required by law to do so, without the prior consent of the Club member first being obtained.

## **Third Party Bodies and Club Contacts**

Working for or, on behalf of, the Club frequently brings Club officials into contact with confidential information of various sorts. Whatever the nature of the information, personal, commercial or occasionally, political, confidentiality shall always be observed. Recognised bodies and associations who request information for the successful running of our club and their association, such as the England Hockey, Devon Hockey Umpires Association, Devon Hockey Association, Men's or Women's Hockey Leagues will also be required to adhere to DPA principles and hold data securely.

No information will be passed to a third party until specific written consent is given by the Club Secretary. Any serious breach should be regarded as serious misconduct.

### **Serious Misconduct - Disciplinary Action**

Serious misconduct in relation to the DPA will be dealt with by the Club Committee in accordance with the Club's Code of Ethics & Behaviour and Club Discipline policy.

**IF YOU ARE IN ANY DOUBT, DON'T DISCLOSE, SEEK ADVICE FROM THE CLUB SECRETARY**

A handwritten signature in black ink that reads "I Mackie". The signature is written in a cursive style with a large initial 'I'.

**Ian Mackie**

**Chair**

**Dated: 02 Apr 2014**