



SIDMOUTH & OTTERY HOCKEY CLUB



DATA PROTECTION POLICY

Introduction

Sidmouth & Ottery Hockey Club (the Club) gathers and uses members' data to enable the Club to run effectively and efficiently. The new European Union General Data Protection Regulation (GDPR)¹ replaces the Data Protection Act 1998 (the 1998 Act) and in doing so, impacts the way we manage members' data in our care. The Club's Data Protection (DP) policy has been updated to apply GDPR.

Data Protection in the Club

The policy sets out the arrangements for how data held by the Club is managed. It also serves to advise members, whose data we hold:

- What we do with the data they provide to us
- What consents are required from them – members under the age of 18 and adult
- How we secure their data
- When and how we delete data when it is no longer needed.

This policy provides direction to all Club officials, including those who hold a formal Club appointment, including, but not limited to, team captains, managers, coaches, who must comply with the policy.

Our Executive Committee is responsible for the application of the policy. The Club Secretary, as the Club's Data Controller, is responsible for, and be able to demonstrate, compliance with the principles (see below).

¹ General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union.

The policy sets out the responsibilities and rights of members to access and check the completeness and accuracy of information the Club holds, and if necessary, to have it corrected. This is co-ordinated by the Club Membership Secretary.

Data Protection Principles

The Club shall adhere to six GDPR Data Protection principles:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

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:

Collect

- Personal data will be collected via the Club membership registration form

- Contact information may be provided without using the membership registration form for expediency, but this must be followed up with a completed membership form
- Members aged U18 will need parental consent (U13) and endorsement (U18) for their data to be provided and used for the purposes stated in the “Use” section.

Storage

- Data will be held on a secure database, managed by the Club Membership Secretary and supervised by the Club Secretary
- Members can access and control their personal data on the Club Membership System using their Username and Password once they confirm registration through the system.

Use

- Our legal bases for processing a member’s data are for the pursuance of the legitimate interests stated below and on the basis of consent. An individual will enter into a data protection agreement with the Club on completing: (1) a club membership registration form and (2) becoming a member by paying a membership fee.
- Personal data will be used for purpose of the effective and efficient running of the Club. This will include:
 - Use by authorised officers including captains, coaches and team managers for the purposes of notifying and organizing hockey and hockey-related activities
 - Use for registration with leagues or other competitions, including supporting members through Single System, regional or national age group hockey
 - Provision of contact information of club officers, captains, team managers, coaches and umpires to county or regional associations.
 - Provision, in aggregated form, for the purposes of the National Governing Body and its administration
 - Provision of selected advertisement of hockey or community related events by the Club through the Club e-mail distribution. The Club will not provide you personal information to a third party for marketing purposes without your consent
- Hardcopy and electronic data shall be held securely at all times by the Club official who has been issued with that data.

Disposal

- The data held on any member will be removed from the Club's records if they do not renew their membership the following season or, request that their details are removed during a season
- All hardcopy and electronic documents, i.e. old copies of contact details, membership forms etc. will be destroyed securely by the holder when new details are issued or, if the holder relinquishes their official role within the Club.

Personal Information Disclosure

GDPR legislation 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, computer, paper, or any other media.

Wherever possible, a member's query will be dealt with informally through a Team's Manager or Captain or, directly by the Club Secretary. Should a member wish to make a formal subject access request or request their details deleted, they should contact the Club Secretary.

Care is required to ensure that personal information is not disclosed to third parties without the prior consent of individuals, unless a statutory or legal requirement to disclose information exists or there is a need to disclose information for the purposes of crime prevention or detection at which point the Club will seek confirmation that we are legally obliged to do so.

Reporting Breaches

All members, coaches, captains and volunteers have an obligation to report actual and potential data protection non-compliance. This allows us to:

- Investigate the failure and take remedial steps if necessary.
- Maintain a register of compliance failures
- Notify the Supervisory Authority (SA)² of any compliance failures that are material either in their own right or as part of a pattern of failures.

Training

All members, coaches and volunteers must be aware of the policy and will receive relevant advice and training on this policy e.g. briefings at Playing or Junior Committee Meetings. Further training will be provided as necessary when the officers of the Club change or there is a substantial change to the law, Club policy or procedures.

² The Supervising Authority in the UK is the Information Commissioner's Office.

Serious Misconduct and Disciplinary Action

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

Practical Notes

All members have access to, and control of, their personal data held officially by the Club, on the Club's membership database once they register through the system. The Club cannot change details stored in the system once registration is completed, but it can delete a member from the Club's data.

The Club cannot be held responsible for personal data shared on an individual basis between members because of their association with the Club. The nature of community hockey clubs can create a blurred line between official and social exchange of personal data.

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

S Ellison

Steve Ellison

Chair

Dated: 18 Apr 2020