



Davenport Dolphins Swimming Club

Affiliated to East Midlands Region & Northamptonshire ASA

www.davenportdolphins.co.uk

General Data Protection Regulation Policy & Procedures

Introduction

General Data Protection Regulation (GDPR) is an important change in government legislation regarding data protection. It effectively provides an update to the Data Protection Act 1998, which introduces new requirements and increases penalties for any breaches.

The GDPR applies to any “data controllers” or “data processors”, which in essence means any organisation that collects personal data (such as membership information) is required by law to comply with GDPR by 25th May 2018. The eight principles of the Data Protection Act state that data must be:

1. Processed fairly and lawfully

Have a legitimate reason for collecting and using the data and tell the individual what you will be doing with their data.

2. Processed for specified, lawful and compatible purposes

Open about the reasons for obtaining personal data.

3. Adequate, relevant and not excessive

Hold sufficient personal data about an individual to do the job and not hold more information than is needed.

4. Accurate and up to date

Take reasonable steps to ensure the information is accurate and up to date.

5. Not kept longer than necessary

Consider the purpose for why you hold the information and regularly review how long you keep the data.

6. Processed in accordance with the rights of the individual

The DPA gives certain rights to individuals. The main ones to note are – any individual has the right to view certain information that is held about them, the right to prevent the processing of their personal information and the right to say no to marketing information.

7. Processed with appropriate security

Be aware of how personal data and sensitive personal data is protected - lock filing cabinets, change passwords regularly on computers, password protect documents.

8. Not transferred abroad without an adequate level of protection

Do not transfer outside of the EEA unless that country has adequate protection for personal and sensitive personal data.

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Terminology

- **Personal Data** - Data which relates to a living individual who can be identified from the data. It includes information about living people, facts and opinions. It can be held electronically or on paper.
- **Sensitive Personal Data** – Information containing facts or opinions about a living individual and relating to:
 - Racial or ethnic origin
 - Political opinions
 - Religious beliefs
 - Trade Union Membership
 - Health
 - Sex life
 - Criminal proceedings or convictions
- **Processing** - Includes the actions of obtaining, recording, retrieval, consultation, holding, disclosing and using data
- **Data Subject** - The living individual who the *Personal Data* relates to
- **Data Controller** - A person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any *Personal Data* are, or are to be, processed.
- **Data Processor** – In relation to *Personal Data*, means any person (other than an employee of the *Data Controller*) who processes the data on behalf of the *Data Controller*.

How does DDSC comply with GDPR?

Data Protection Policy

The Club has adopted a Data Protection Policy in line with the new GDPR guidelines. The Policy is accessible to all members via the website.

DDSC Data Protection Statement

The club has adopted the following Data Protection Statement:

Daventry Dolphins Swimming Club will use your personal data for the purposes of your involvement in club activities. I understand that by registering with the club I am consenting to receiving information about the club by post, email or phone.

Data will be shared with Swim England to meet membership requirements. Swim England will use personal data only for the purpose of your involvement in swimming activities. I understand that by registering with the club I am consenting to receiving information from Swim England about swimming, including my swimming membership details, by post, email, or phone unless stated otherwise.

Daventry Dolphins Swimming Club will use personal data only for the purpose of your involvement in swimming administration, events and volunteering. I understand that by submitting this form, I am consenting to Daventry Dolphins Swimming Club storing my essential data and using it according to the regulations.

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The club should also ensure that all members have access to Swim England's Data Protection Notice (See Appendix A). It is the clubs responsibility to ensure that Swim England are informed of any changes to Personal Data that is held e.g. names, addresses, contact details -- this is normally done via the Online Membership System each year during the annual renewals process.

Data Protection Officer

The club has appointed a Data Protection Officer (DPO). Under the obligations of the General Data Protection Regulation (GDPR) the Data Protection Officer will be responsible for all issues relating to the protection and processing of personal data, including:

- Informing and educating employees, volunteers and the club committee of any processors or joint controllers and our obligations under the regulation.
- Monitoring our overall compliance with the regulation including the performance of audits, data protection impact assessments, policy and procedures, training and reporting to the Executive Committee.
- Providing advice and guidance on aspects of the regulation when required.
- Acting as a point of contact for the supervisory authority and data subjects.

In accordance with the GDPR, there may be other information security tasks which will need input or assistance from the DPO. These additional tasks although permitted will not supersede the DPO role as defined in the regulation.

Club Membership Forms

It is important that members understand what we do with their data at the point we collect it. When a member joins the club the (hard copy) membership form includes the DDSC Data Protection statement.

*"Daventry Dolphins Swimming Club (**The Club**) take the protection of the data that we hold about you as a member seriously and will do everything possible to ensure that data is collected, stored, processed, maintained, cleansed and retained in accordance with current and future UK data protection legislation.*

Please read the full Privacy Notice carefully to see how The Club will treat the personal information that you provide to us. We will take reasonable care to keep your information secure and to prevent any unauthorised access. (*Privacy Notice can be found on the website under Policies / GDPR).*

The Club will use your personal data for the purposes of your involvement in club activities. I understand that by registering with the club I am consenting to receiving information about the club by post, email or phone.

HOW WE USE YOUR PERSONAL DATA

On receipt of your personal data, the Club will set up an online membership account on Team Unify (The Clubs Membership Management System). You will initially be requested to verify your email address. You will then be invited (via email) to log into your membership account. Once this has been done you will be able to add or amend any personal data that the club holds on you.

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DATA SHARING WITH SWIM ENGLAND

When you become a member of or renew your membership with The Club you will automatically be registered as a member of Swim England. We will provide Swim England with your personal data to meet membership requirements only. Swim England uses personal data only for the purpose of administrating swimming activities. I understand that by registering with the club I am consenting to receiving information from Swim England about swimming, including membership details, by post, email, or phone unless stated otherwise”.

All Club Membership Forms are stored securely. Once data from the (hard copy) membership form is transferred to Team Unify, the details on the membership form are also added to the ‘DDSC Members Database’ located in Dropbox. Once this has been done the membership form will be destroyed securely (e.g.: shredded) or handed back to the new member.

Club Entry Forms for Events

Data regarding a swimmer’s results may be passed to other organisations (e.g.: British Rankings) to publish; the individual entering the event will be made aware of this. Therefore, if the club organises an event, to comply with the Data Protection Regulations, it will include the following wording on competition entry forms:

“Daventry Dolphins SC may publish your personal information as part of the results of the event and may pass such information to Swim England or any affiliated organisation for the purpose of insurance, licenses or for publishing results. Results may include (but not be limited to) name, DOB, ASA affiliation number, club and race times. All club entry forms will be stored securely and will be destroyed securely (e.g.: shredded) within 7 days post meet”.

All club entry forms will be stored securely. For all team galas Team Manager packs (hard copy) will be produced which will include team lists, contacts, medical details, emergency contacts etc. (i.e. information including personal data). This information will only be accessed by the Team Manager (or other authorised people) and kept securely at all times. Team lists and medical information will also be carried and kept securely by the Team Manager at each gala. . Transportation of data in any format (including paper) will be seen as a threat to information security. On completion of the gala, it is the Team Managers responsibility to ensure all personal data is deleted and shredded securely, immediately post meet, (at least within 3 days).

TeamUnify Annual Registrations

All members will be required to complete an annual registration via TeamUnify. The following statement will be sent out to all members at the appropriate time annually.

DDSC Compliance with new General Data Protection Regulations (GDPR)

*Welcome to the **Daventry Dolphins Swimming Club** Electronic Registration that ensures our compliance with the new GDPR rules coming into force on the 25th May 2018!*

The GDPR Act (2018) places certain obligations on organisations who process individuals’ personal data. It regulates how personal information should be used and protects people from misuse of their personal details.

*Privacy law requires organisations to obtain explicit consent from ALL members (including parents and guardians) before collecting and processing their sensitive personal data. Our newly adopted platform **TeamUnify** (TU) already provides the ability to obtain such explicit consent through*

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our Online Registration platform. Attached to this registration are 5 DDSC agreements that need to be digitally signed by the TU account holder (if swimmer under 18) or member over 18. These agreements are then stored in the TU database AWS (Amazon Web Services) so we can identify who has consented, to what and when. These agreements were previously issued as paper copies so we apologise for having to repeat this process digitally.

See the GDPR Compliant [TeamUnify Privacy Policy](#) here.

Our responsibility is to ensure personal data we hold about our members is:

- *secure*
- *viewed only by those who really need to view it*
- *limited to what is needed*
- *accurate*
- *up to date*
- *only kept for only as long as it is needed*
- *deleted / destroyed after a period of time*
- *available to be seen by its owner on request*
- *not shared with third parties unnecessarily*
- *easily amended if incorrect*

We acknowledge that:

- *the committee is aware that Data Protection legislation applies to the Club*
- *the website informs people of how their data will be used*
- *all officials, staff and members understand how to handle personal data*
- *Club officials have given permission for their names and contact details to be made publicly available*
- *there is a process to follow if any Personal Data is lost or stolen*
- *changes within the Club that affect the use of Personal Data are communicated*
- *members understand that broadcast emails can present a security risk*
- *Personal Data will only be used for Club purposes*

The registration will also include:

- *Medical Release Waiver*
- *Liability Waiver*
- *Members Code of Conduct*
- *Parents Code of Conduct*
- *Consent for Photography and images*

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DDSC Dropbox

The DDSC Dropbox has been set up specifically for GDPR. All documents retained by members of the committee that contain personal data should be uploaded to Dropbox. This includes any form or document that identifies another individual.

A separate Dropbox has been set up for Welfare files, which can only be accessed by the Club Welfare Officer and Chairperson.

All documents (hard copy or soft copy) that identifies other individuals within the club will not be stored on personal hard drives.

Personal data collected manually and stored in files as a hard copy will still be managed in accordance with the data protection regulations.

Data Retention

Our data mapping document outlines how long the club needs to keep specific data. The club cannot keep data for longer than is necessary for the purpose for which it was collected. We will also keep members informed how long we will keep their personal data. For example, when a member resigns the club should delete all data relating to that person one month after the date of the resignation period (e.g.: last date of being a member). Any club records will remain until that record is broken. British Swimming Rankings and DDSC rankings will remain for 12 months from when the time was achieved.

Responding to Subject Access Requests

Subject access requests (requests for copies of personal data from individual club members) will be responded to within one calendar month of receipt of the request. There is no charge for this. The DPO will be responsible for dealing with these requests.

Breaches

The club has only 72 hours from being aware of a breach to report it to the ICO. The club has guidelines for all committee members, coaches, volunteers to follow when dealing with. For example, if a membership secretary holds the membership data on their laptop and it is not encrypted and gets stolen- the data is now at risk and a breach would have to be reported. We need to make sure that personal data is held securely, i.e. that electronic documents are encrypted, and password protected or located in Dropbox and backed up on a regular basis. We need to make sure that all volunteers can identify when a breach has happened and that they know what they should do and who they should talk to. In the first instance, the DPO should be informed of any breaches.

Data Transfer

One of the principles of the Data Protection Act 1998 (and the GDPR), is that you can only process data for the purpose for which it is collected. This means that if we collect a name and contact details of an individual, so that they can become a member of the club, we cannot simply use that information to allow other bodies (e.g. a club sponsor) to contact them for marketing purposes.

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The General Rule for Storing of Records / Personal Data

- Ensure all records are kept securely and up to date – i.e. locked away, password_protected documents on computers.
- Ensure that only nominated club officials have access to Personal Data and understand how to comply with the Regulations.
- Do not disclose – written or verbal – any Personal Data of any member to anyone other than Swim England (if their request is appropriate) or other approved club officials.
- Ensure that, for any emails that are sent outside of any specific working group as a mass email communication (i.e.: to members) then the emails are to be blind copied.

Version control

Initial version	May 2018
Review	September 2020



If you are a swimmer and have any concerns about being photographed/filmed at our events please complete the Refusal of Consent Form provided by the relevant Events Department.

If you are a Parent/Guardian/Carer who has concerns about your child being photographed/filmed, please refer to the photography section of our child safeguarding policy and procedures document 'Wavepower'.

If you have any other concerns in this area, please contact the [Swim England Legal Department](#).

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WASA and SASA

As constituent members of British Swimming, WASA and SASA will be able to view your information for swimming administration purposes only.

Doping Control

If you enter swimming competitions, you may be subject to doping control as part of the Swim England/British Swimming commitment to a drug free sport. At the time of sample collection, your personal data will be collected by UK Anti-Doping which undertakes the testing and administers the programme.

You should see the data protection notice for UK Anti-Doping for details of how your information will be used (<http://www.ukad.org.uk/privacy-policy/>)

Marketing

Swim England and British Swimming each work with a number of sponsors and commercial partners to promote swimming, raise funding for the sport and to secure opportunities for members.

We would like to contact you by post or electronically to tell you more about the partner offers available to you, unless you have opted out of receiving information about them.

Opt outs. If you would like to opt out of receiving direct marketing communications, you can do so by contacting www.swimmingmembers.org.

You can request your personal information

Any person can apply for a copy of their information by making a Subject Access Request.

There is a charge of £10 to process each Subject Access Request. Please contact the legal department [here](#) for the forms to submit your request.

We are required to respond within 40 calendar days of receipt of the request, though we will always try to respond as quickly as possible.

In some exceptional cases, we may not release the information, or the information in its entirety. This may be because the data is subject to an exemption under the Data Protection Act.

Updating your information

We need to keep your information accurate and up to date.

In the event that there is change to your personal information, for example, your contact details, please let us know as soon as possible, by contacting www.swimmingmembers.org/.

Contact us

For any questions or concerns about Data Protection email the Swim England Legal Department [here](#).

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