



Data Protection Policy

1. Data Protection and Privacy Policy

Durham City Aquatics (DCA) is a Data Controller under the Data Protection Act 2018 and, as such, will control and protect all of the personal information provided by the members of the club.

Link to Swim England Data Protection Policy: <https://www.swimming.org/swimengland/data-protection-guidance/>

Link to general data protection regulation (GDPR): <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>

DCA's Data Protection and Privacy Statement can be found in Appendix A

2. Data Security and Compliance

The club secretary or another appointed data control officer within DCA is responsible for overseeing our compliance with data protection laws

3. Security Policy

In this section we outline the type of personal information stored, why and how it is stored and the deletion of personal information.

3.1 Data Classification

DCA is required to obtain and store members' personal information to enable the management of club memberships. We will use the members' personal information for the following;

- To provide swimmers with insurance via Swim England
- To administer membership to the club (send membership, committee and club information via email including invoices for squad fees, membership renewals etc.)
- To promote and encourage participation in galas or other DCA events via email communication
- Managing gala entries
- Providing information to members and/or parents of upcoming courses and trainings

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using said information. If you wish to object to any of the above processing of your information, please contact: durhamcitysecretary@gmail.com. If we agree and comply with your objection, this may affect your and the DCA's ability to undertake the tasks above for the benefit of your membership.

DCA uses an online system called Team Unify (TU) to collect and store all personal information. TU is password protected and a member's personal information can only be accessed by the member/parent and club TU administrator. The privacy document for TU can be found here: <https://www.nbcuniversal.com/privacy/european>

As the database will be downloaded onto a computer to be read, any computer hosting the database must be password protected. Any other form of electronic data containing sensitive information will be password protected to prevent unauthorised viewing. Electronic data should be kept for the minimum period necessary.

Note:- Only those authorised may hold printed copies of any sensitive data, unless prior approval has been obtained from data controller and an entry made in the register.



The type of data stored in TU includes;

- Contact details - name, address, date of birth, gender, email address (for children under the age of 18 the email address is that of the parent).
- Membership criteria – swimmer, non-swimmer, coach or other poolside helper, volunteer or parent
- Swim England membership number
- Emergency contact details (– name, address, telephone numbers, email address, relationship to member/swimmer. Contact details for GP – name, telephone number – for emergency use only)
- Any medical condition which may require rapid treatment to be administered (e.g. asthma, epilepsy etc.)
- Medication information
- TU is also used to store attendance information at training sessions, training videos, photographs, personal best times and gala information such as race times – this information is subject to input from the relevant coach

The club uses Xero to process its financial information and Xero is compliant with all current GDPR legislation. For more information see: <https://www.xero.com/uk/campaigns/xero-and-gdpr/>

3.2 Hard copy data security

DCA is required to hold some hard copies of documents containing sensitive information. These documents are stored in a locked storage area when not in use. These documents and the custodians are;

- Completed Accident Report Forms – Club Secretary

3.3 Destruction of Hard Copy Data

Hard copies of data should be kept for the minimum period necessary. Destruction of data is either, by a minimum of class 2 shredding (Cross Cut Shredding) or incinerating.

3.4 Sharing of personal data

DCA will only share personal information with coaches and club officials as required or other swimming clubs as required for participation in, and at, swimming galas and events.

This privacy notice applies to DCA's own website only. Should you link to other websites (via the DCA website) you should read the relevant privacy notice of any linked pages, as this will differ to our club's.

Club competition results and promotional 'news' is publicised on the clubs' website, Facebook Page and Twitter account and this may include names, ages and results/prize winners and club achievers.

3.5 Keeping personal information accurate

You are responsible for ensuring that the information held by DCAs about you or your child/children (if under 18) is accurate. Any changes should be updated in TU or communicated to the Club Secretary.

If you wish your information to be deleted this can only be actioned if you or your child/children no longer wish to be members of DCA.

Personal information must not be transferred outside of the EU unless there are appropriate safeguards in place as set out in the GDPR regulations. This is mainly relevant to data held in Cloud-based services such as TU.

3.6 How long do we store personal information?

DCA will only keep personal information for as long as necessary to provide you with member services; for the duration of your membership with DCA. Should you leave DCA your details will be deleted after six months.

4. Changes to the Privacy Policy

DCA will regularly review this policy and we will endeavour to retain an up to date copy on the DCA website.

5. How to contact us

Please contact us if you have any questions about this privacy notice or information we hold about you or your child/children by emailing: durhamcitysecretary@gmail.com

Policy updated October 2020

Appendix A - Data Protection and Privacy Statement

Durham City Aquatics is a Data Controller under the Data Protection Act. We hold information for the purposes of administration of membership records, recording competitive swimming times, and certain other functions as assigned by Swim England (SE) our governing body. The information we hold may be used by the committee members for the purpose of club duties, SE or any other organisation affiliated to SE. With the exception of the individuals specified in Appendix B, any person from the committee requiring personal data must request the information they require from the Data Controller stating the reason they require the information. The Data Controller will keep a record of all requests for information and the purpose the information was used for. We will not give information about you to anyone outside of SE, SE affiliated clubs or the local council unless the law permits us to do so.

Confidentiality and Security

The Club has a legal duty to protect the confidentiality of its members' information. We take every precaution to protect any information you have submitted to us, in accordance with legislation such as the Data Protection Act 2018. Any data, which we hold, is protected in accordance with policies given above.

Sharing of Information

Any information you submit to us will only be shared in accordance with the law.

Notification of Changes to Policy

If we decide to change our privacy policy, we will post details of any changes on our notice board and website. This will help ensure that you are always aware of what information we collect, how we use it, and under what circumstances, if any, we share it with other parties.

Appendix B – Classified Data Register

Club Management Database Users

Membership Secretary

Chair

Secretary

Competition Secretary

Head Coach

Squad Co-ordinators

Copies of club membership information (via Team Unify)

Membership Secretary

Club Registers (via Team Unify)

Squad Co-ordinators

Membership Secretary

Treasurer

Water Polo Secretary

Financial information (via Xero)

Treasurer