

# **GREENOCK GLENPARK HARRIERS**

## **Data Protection Policy**

### **1. Purpose**

The purpose of this policy is to comply with the General Data Protection Regulations (GDPR) which provides an update to the Data Protection Act 1998 which come into force on 25 May 2018.

This policy should be read in association with the Club's Privacy Policy.

### **2. Background**

This policy has been developed taking account of advice from Scottish Athletics and from the Information Commissioner's Office together with examples of existing or developing practice.

### **3. Scope**

This policy applies to all records where personal data is recorded. such as those held: This includes records such as those held:

- on computer,
- on portable media such as pen drives,
- in paper filing systems,
- individual files such as coach's notes, and
- individual spreadsheets.

Personal data is any information which might allow an individual, or their characteristics to be identified. It includes qualitative information (eg names, addresses), numerical information (subscription category, age, date of birth) or photographic information.

All personal data is sensitive, but it is especially important to remember that some information related to, for example, medical conditions, protected characteristics, looked after status (in the case of children and young people), or family circumstances are particularly sensitive. Any club member who knows such personal information by virtue of their role in the club should never disclose such information to a third party whether formally, or informally, unless it is to protect the safety of the individual concerned.

### **4. Statement of Principles**

So far as reasonably possible Greenock Glenpark Harriers will ensure that personal data is:

- processed securely;
- updated regularly and accurately;
- limited to what the club needs;
- used only for the purpose for which it is collected; and
- used for marketing purposes, only if the individual has given the club consent to do so.

The Club ensures current accuracy of members' details by the use of a third party online membership record service provider which allows members to update their details directly. It is an individual responsibility of members to ensure that their details are current and accurate.

## 5. Status

Greenock Glenpark Harriers is a data controller and a data processor within the meaning of GDPR because it collects and stores and processes personal data.

## 6. Communication

This policy will be available through the Club's web-site. Existing members will be made aware of its existence and how to access it by a bespoke email. New members will be made aware at the time of enrolment on their membership application form.

How the data is stored and used is contained within the Club's Privacy Policy which is available through the Club's web-site.

Club officials will be reminded of their responsibilities through:

- coach briefings,
- volunteer briefings,
- review of this policy at Trustee and Board meetings,
- special to purpose briefings as required, and
- an aide memoire (Appendix 4)

## 7. Events

When events are organised requiring athletes to complete a registration form, the following wording will be included: "You agree that we may publish your Personal Information as part of the results of the event and may pass such information to the governing body or any affiliated organisation for the purpose of insurance, licences or for publishing results either for the event alone or combined with or compared to other events. Results may include (but not be limited to) name, any club affiliation, race times, occupation and age category."

## 8. Why the Club Collects Data

The Club holds and collects data in the legitimate interest of the operation of the Club's activities which include.

### a. For Training and competition entry the Club will share data with:

- club coaches or officials to administer training sessions;
- club team managers to enter events;
- facility providers to manage access to the track or check delivery standards; and
- leagues, associations (and schools' associations) and other competition providers for entry in events.

### b. For Funding and reporting purposes anonymised data will be: 2

- shared with a funding partner as condition of grant funding e.g. Local Authority; and
- analysed to monitor club trends.

### c. For Membership and club management data will be limited to only the information necessary for the purpose of:

- processing of membership forms and payments;
- sharing data with regulatory and governing bodies such as Scottish Athletics and governmental organisations as required;
- sharing data with committee members to provide information about club activities, membership renewals or invitations to social events;

- publishing of race and competition results;
- website management.

d. Marketing and communications, for sending : (where separate consent is provided)

- information about promotions and offers from sponsors;
- club newsletters;
- information about selling club kit, merchandise or fundraising.

## **9. Consent**

Members must give consent for their data to be stored and processed. So that they can do this in an informed way they must know how the Club will do this. It will be clearly stated through the web-site and membership application forms:

- That personal data is collected through a third party membership record service provider which maintains the membership database on behalf the Club.
- That personal data will be stored on a lap-top computer which is password protected, and has appropriate security software installed, and which is backed up on a regular basis.
- Occasionally data will be stored on an encrypted pen-drive for purposes of transfer to another machine.
- Occasionally data may be e-mailed to office bearers, trustees or club officials for administrative or organisational purposes.

In addition, members will be asked to provide separate consents to be contacted by post, e-mail, SMS (text messaging), and telephone for marketing and communications purposes. Where the member is designated as junior member under club policy, then their parent must provide consent.

## **10. Data Capture**

Membership data is initially submitted to a third party membership record service provider which stores the Club's Membership database on behalf of the Club.

Personal data must be as accurate as possible.

The membership application form and race entry forms will only contain questions or information fields that are simple, easy to understand and designed to capture the information for which they are intended.

The data requested will conform to, and be restricted by, the requirement to administer the Club in an adequate, efficient, effective and safe manner

## **11. Transfer of Data**

Data can only be processed for the purposes for which it is collected (Section 8).

Personal data, such as club members, names or their contact details will not be provided to any third party such as a club sponsor or Scottish Athletics without the written (including electronic) consent of the member, or members concerned. It is permissible to allow members' details to a third party, such as Scottish Athletics if this has been made clear at the time of the enrolment of the member or members concerned.

## **12. Data retention**

It will also be stated through the web-site that personal data will be retained:

- for the period that they are on any waiting list;
- while they are a club member; and
- for a period of not more than six years from the June (or such other period required by the Charity Regulator) following the period covering the last subscription. (For example, if their subscription expired in February 2017, their details will be removed on or before 30 June 2025.) The six year retention period is a consequence of the Club's status as a registered Scottish Charity, the governance requirements of which include a need to retain records for six years.

## **13. Security**

Any office bearer, paid officer of the club, or club member, including volunteers, who is in possession of personal data will take all reasonable precautions to ensure data is stored and maintained securely, including:

- using password protection on documents;
- using password protection on lap-tops or equivalent;
- ensuring computer drives, including cloud technology is secure;
- files and documents are backed up regularly;
- use of adequate security software to protect against hacking or other malware activity;
- use of encryption;
- ensuring computers, pen-drives or hard copy files are stored securely;
- the risk of theft, for example from unattended vehicles is minimised;
- the risk of unintentional loss, for example, by being left on public transport is minimised; and
- that open computers or hard copies are not left where they can be read or easily accessed by third parties in the home, work, club or other setting such as public transport.

## **14. Breaches**

Any potential breaches of the GDPR, for example if a file containing personal information is lost or stolen, must be reported to the Information Commissioner's Office within 72 hours from on office bearer of the Club being made aware of the incident.

## **15. Data processors**

If the Club commissions a third party organisation to process data, for example to host or maintain the web-site, or to process race entries then a written contract, or equivalent agreement of terms and conditions, must be in place. This contract will ensure that the third party is aware of its obligations under GDPR and will use the model contractual clauses supplied by Scottishathletics, or appropriate equivalent wording. Any such third party must provide reassurance that it has adequate security to protect personal data. It should be able to comply with the most up-to-date advice available from scottishathletics issued to help assure security is in place.

## **16. Information Commissioner's Office notifications**

The Club no longer has to notify the Information Commissioners Office (ICO) that it is a data controller and was in any case exempt under existing regulations as a not-for profit organisation. Club members have the right to complain to the Information Commissioner's Office 0303 123 1113 or [ico.org.uk](http://ico.org.uk)

17. **Responding to subject access requests**

Subject access requests (requests for copies of any personal data, from individual club members, or the recognised carers of club members) must receive a response within one calendar month. No charge will be made for dealing with the request. All such requests must be made in writing. A log will be kept of all subject access requests detailing the date the request was received, who made the request, the date a response was issued, and who responded on behalf of the Club.

18. **Risk**

The ICO has power to fine organisations up to 2% of annual turnover for breaches in data protection. This will be included in the Club's risk profile.

19. **Advice**

The ICO also now offer a helpline. Representatives of small organisations should dial 0303 123 1113 and select option 4 to be diverted to staff who can offer support. Further specific guidance is anticipated from Scottish Athletics.

20. **Review**

This policy should be reviewed in March 2019, and thereafter at three yearly intervals to ensure it includes best practice and the most current advice.

## **Appendix 1**

For Inclusion on the Club Web-site

The Club collects data for a number of different purposes. We will take all reasonable steps to keep your personal information safe and secure. Sometimes we will provide data to a third party, usually in connection with the organisation of events such as races, or because Scottish Athletics has requested it or because we are required to provide it by an organisation in connection with its legitimate exercise of its statutory function.. We will only share your personal data if you have given permission, or if we are required to by a statutory organisation. For the Club to store and use your data, you must first give your permission. You are entitled to change your permission at any time, and to see what information the Club holds about you. Personal data will be retained for the period that you are on the membership waiting list, while they are a club member and for six years after you leave the Club.

A copy of the Club's Data Protection Policy and the associated Privacy Policy is available through the "Policies" section of this web site. You should refer to this for full details on how we protect your data.

## **Appendix 2**

For Inclusion on Club Membership Application Forms

Greenock Glenpark Harriers has a Data Protection Policy and a Privacy Policy which can be viewed through the Club web-site: [www.greenockglenparkharriers.com](http://www.greenockglenparkharriers.com)

## **Why we need this information**

The Club holds and collects data in the legitimate interest of the operation of the Club's activities which include.

- For Training and competition entry the Club will share data with:
- club coaches or officials to administer training sessions;
- club team managers to enter events;
- facility providers to manage access to the track or check delivery standards; and
- leagues, associations (and schools' associations) and other competition providers for entry in events.

For Funding and reporting purposes anonymised data will be :

- shared with a funding partner as condition of grant funding e.g. Local Authority; and
- analysed to monitor club trends.

For Membership and club management data will be limited to only the information necessary for the purpose of:

- processing of membership forms and payments;
- sharing data with regulatory and governing bodies such as Scottish Athletics and governmental organisations as required;
- sharing data with committee members to provide information about club activities, membership renewals or invitations to social events;
- publishing of race and competition results; and
- website management.
- Marketing and communications, for sending :
  - information about promotions and offers from sponsors;
  - club newsletters; and
  - information about selling club kit, merchandise or fundraising.  
The Club may also pass information to Scottish Athletics.

### **How We Look After Your Data**

Your information:

- Is collected through a third party membership record service provider which maintains the membership database on behalf the Club.
- Will be stored on a lap-top computer which is password protected, and has appropriate security software installed, and which is backed up on a regular basis.
- Occasionally data will be stored on an encrypted pen-drive for purposes of transfer to another machine.
- Occasionally data may be e-mailed to office bearers, trustees or club officials for administrative or organisational purposes.

Personal data, such as club members, names or their contact details will not be provided to any third party such as a club sponsor or Scottishathletics without the written, including electronic or on-line consent of the member. The Club will require that any external organisation which handles data on behalf of the Club has appropriate policies as required by the General Data Protection Regulations.

By completing and signing the membership application form you are giving the Club permission to store and use your data in the way described.

The Club's only method of communicating with its membership, other than the web-site, is by e-mail. By signing this form you are specifically agreeing to be contacted by e-mail. Should the club propose to share details of its membership base with an external party (for their marketing or communication purposes), other than as described in the data protection policy your specific consent will be requested.

Signed (member): \_\_\_\_\_  
(or parent on behalf of junior member)

Date: \_\_\_\_\_

### **Appendix 3**

#### For Inclusion on Race Entry Forms

Greenock Glenpark Harries has a Data Protection Policy and a Privacy Policy which can be viewed through the Club website: [www.greenockglenparkharriers.com](http://www.greenockglenparkharriers.com)

When events are organised requiring athletes to complete a registration form, the following wording will be included:

*"You agree that we may publish your Personal Information as part of the results of the event and may pass such information to the governing body or any affiliated organisation for the purpose of insurance, licences or for publishing results either for the event alone or combined with or compared to other events. Results may include (but not be limited to) name, any club affiliation, race times, occupation and age category."*

Where the race organiser has employed an external specialist service, the race entry form should also include this statement.

"The race results will be processed by a specialist service. Greenock Glenpark Harries has sought and obtained reassurance that the service provider has adequate security to protect personal data and complies with the most up-to-date advice available from scottishathletics."

### **Appendix 4**

#### Data Protection Aide Memoire for Club Officials, Coaches, Administrative Team and Volunteers

##### **1. Scope**

This policy applies to all records where personal data is recorded. records such as those held:

- on computer, including lap-tops and "cloud technology",
- on portable media such as pen drives,
- in paper filing systems,
- individual files such as coach's notes, and
- individual spreadsheets.

##### **2. Definition**

This includes

Personal data is any information which might allow an individual, or their characteristics to be identified. It includes qualitative information (eg names, addresses), numerical information (subscription category, age, date of birth) or photographic information.

##### **3. Sensitivity**

All personal data is sensitive, but it is especially important to remember that some information are particularly sensitive, for example:

- medical conditions,
- protected characteristics,
- looked after status (in the case of children and young people), or
- family circumstances. Any club member, paid official, volunteer, or member of the administrative team who knows such personal information by virtue of their role in the club should never disclose such information to a third party whether formally, or informally, unless it is to protect the safety of the individual concerned. If in any doubt consult the Club welfare officer.

#### **4. Right of Access**

Members have a right to see anything that is held on record about them. Any comments, including coaching notes should be written on the assumption that the subject of the notes will be able to read what has been written without redaction. If a member makes an access request, any information provided should redact personal details of other individuals.

#### **5. Security**

Any Club officials, coach, member of the administrative team or volunteer who is in possession of personal data must take all reasonable precautions to ensure data is stored and maintained securely, including:

- using password protection on documents;
- using password protection on lap-tops or equivalent;
- ensuring computer drives, including cloud technology is secure;
- files and documents are backed up regularly;
- use of adequate security software to protect against hacking or other malware activity;
- use of encryption;
- ensuring computers, pen-drives or hard copy files are stored securely;
- the risk of theft, for example from unattended vehicles is minimised;
- the risk of unintentional loss, for example, by being left on public transport is minimised; and
- that open computers or hard copies are not left where they can be read or easily accessed by third parties in the home, work, club or other setting such as public transport.

#### **6. Transfer of Data**

Data can only be processed for the purposes for which it is collected (see Section 8 of the Data protection Policy for detail).

Personal data, such as club members, names or their contact details cannot be provided to any third party such as a club sponsor or Scottish Athletics without the written (including electronic) consent of the member, or members concerned.

It is permissible to allow members' details to a third party, such as Scottish Athletics if this has been made clear at the time of the enrolment of the member or members concerned. Data may also be provided to an organisation, such as HMRC or the Charities Commissioner in relation to the proper exercise of their legal function, or to Police Scotland in the conduct of a criminal investigation.

#### **7. Notification**

If you become aware of a possible data breach, for example through the loss or theft of records, you should report it to the Club Chair or Treasurer as soon as possible.



## Privacy Policy

1. Purpose  
The purpose of this policy is to comply with the General Data Protection Regulations (GDPR) which provides an update to the Data Protection Act 1998 which come into force on 25 May 2018.  
This policy should be read in association with the Club's Data Protection Policy.
2. Background  
This policy has been developed taking account of advice from Scottish Athletics.
3. Reasons for the Policy  
Everyone is entitled to privacy. This means that information about individual Club members should not be heard or read by anyone that the member themselves does not wish to hear or read it.
4. Taking Care With Your Privacy  
To safeguard your privacy, this will be important:
  - The Club will collect the least amount of information about you that it needs.
  - Once collected, the information will be kept as carefully as possible.
  - Your information will be shared in the Club only with those with a need to know.
  - Your information will not be given to anyone unless you or your parent has agreed beforehand.
5. Why the Club Needs Information About its Members and Who we Will Share it With  
The Club holds and collects data in the legitimate interest of the operation of the Club's activities which include:

### a. For Training and competition entry the Club will share data with:

- club coaches or officials to administer training sessions;
- club team managers to enter events;
- facility providers to manage access to the track or check delivery standards; and
- leagues, associations (and schools' associations) and other competition providers for entry in events.

### b. For Funding and reporting purposes anonymised data will be :

- shared with a funding partner as condition of grant funding e.g. Local Authority; and
- analysed to monitor club trends.

### c. Membership and club management data will be used for:

- processing of membership forms and payments;
- sharing data with regulatory and governing bodies such as Scottish Athletics and governmental organisations as required;
- sharing data with committee members to provide information about club activities, membership renewals or invitations to social events; and 12

d. publishing of race and competition results; web-site management.

Marketing and communications, for sending :

- information about promotions and offers from sponsors;
- club newsletters; and
- information about selling club kit, merchandise or fundraising.

As a Club Member you will have been asked separately about (d) above.

## 6. Especially Private Information

In addition to basic information such as your name, address and date of birth, it may be important for the Club to know other things about you. Sometimes this can be very personal, but is necessary for safety reasons (for example if you have a medical condition) or to ensure the Club can fulfil any wider responsibilities (for example if you have a disability). The main categories of such sensitive information are:

- medical conditions,
- protected characteristics,
- looked after status (in the case of children and young people), or
- family circumstances.

You are not obliged to disclose any of this information to the Club, but it is important to know that the Club cannot accept any responsibility for you if you have not disclosed information which later becomes important. For example, if you do not tell us about a medical condition it may be dangerous. Any club member who knows such personal information by virtue of their role in the club should never disclose such information to a third party whether formally, or informally, unless it is to protect the safety of the individual concerned. If in any doubt consult the Club welfare officer.

## 7. Security

Any office bearer, paid officer of the club or club member, including volunteers who is in possession of personal information must take all reasonable precautions to ensure data is stored and maintained securely, including:

- using password protection on documents;
- using password protection on lap-tops or equivalent;
- ensuring computer drives, including cloud technology is secure;
- files and documents are backed up regularly;
- use of adequate security software to protect against hacking or other malware activity;
- use of encryption;
- ensuring computers, pen-drives or hard copy files are stored securely;
- the risk of theft, for example from unattended vehicles is minimised;
- the risk of unintentional loss, for example, by being left on public transport is minimised; and
- that open computers or hard copies are not left where they can be read or easily accessed by third parties in the home, work, club or other setting such as public transport.

## Looking at the Information the Club Holds

You are entitled to see the information the Club holds about you. If you want to see this information you should ask your coach, or an office bearer of the Club. Such information, when supplied will not include any personal information related to anyone else.

### **Junior Members**

As a principle junior members have the same rights as all other Club members. In addition, and in general, however the parents of junior members also exercise these rights on behalf of their children.

If the application of this principle causes concern in the specific circumstances of individual children then the club welfare officer should be consulted. If there is a dispute between parents about access to information the Club policy is that this has to be resolved between the two individuals concerned before the Club will respond.

### **10. If Something Goes Wrong**

If you think that someone has lost the information about you, or that someone has your personal information who should not, or who you do not want to have it, then you should ask your coach or an office bearer of the Club. In such circumstances if you are not happy with the answer you get, then you should complain formally to the Club Chair, or you can complain to the Information Commissioner's Officer [www.ico.org](http://www.ico.org). Tel 0303 123 1113