

North Avon Canoe Club Data protection policy

Last updated : March 2018

Introduction

North Avon Canoe Club needs to gather and use certain information about individuals. These include members, business contacts and other people the Club has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the club's data protection standards — and to comply with the law.

Why this policy exists

This data protection policy ensures North Avon Canoe Club:

- Complies with data protection law and follow good practice
- Protects the rights members and others
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law

The Data Protection Act 1998 and, from May 2018, the General Data Protection Regulation (GDPR) describes how organisations — including North Avon Canoe Club— must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act and GDPR are underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

THE GDPR details the following rights:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability; the right to object;
- the right not to be subject to automated decision-making including profiling.

People, risks and responsibilities

Policy scope

This policy applies to:

- Club members of the Executive Committee
- All volunteers of North Avon Canoe Club
- All contractors, suppliers and other people working on behalf of North Avon Canoe Club

It applies to all data that the club holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This includes:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Date of birth
- Paddling qualifications and BC membership status

Legal basis for holding and using data

The GDPR requires each organisation that holds personal data on individuals to define the legal basis on which they hold and use this data.

The Club primarily holds data for Club members and will only use this data for legitimate purposes. The Club will only hold and use data for the purposes detailed in these documents. Hence the Club's legal basis as allowed by the GDPR is "Legitimate Interest".

The absolute minimum data required for the Club to carry out its legitimate membership activities are: Member names, Date of birth, Telephone, Email and Postal address. Consent for holding and using this information will be sought when an individual applies to become a member and thereafter annually when they renew their membership, being a tick box on the form (May, 2018 onwards).

At any point in their membership, a member will have the right to have this information removed from the Club's records. All email correspondence with members will include a right to opt out of further emails from the Club.

If a member opts out of email correspondence, the Club will ensure that any information conveyed by email to members is available to them by other means i.e. Club website, and Facebook group.

Data protection risks

This policy helps to protect North Avon Canoe Club from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the club uses data relating to them.
- **Reputational damage.** For instance, the club could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who belongs to, volunteers, works for or with North Avon Canoe Club has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **Committee** is responsible for ensuring that North Avon Canoe Club meets its these obligations.

General member and volunteer guidelines

- The only people able to access data covered by this policy are those who need it for their work.
- Data should not be shared informally. When access to personal data is required members can request it from a member of the Committee.
- Club members and volunteers must keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data must not be disclosed to unauthorised people, either within the club or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Club members should request help from the a member of the Committee if they are unsure about any aspect of data protection

Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the a member of the Committee.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Club members should make sure paper and printouts are not left where unauthorised people could see them.
- Data printouts should be shredded and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Club membership data will only be stored on approved to web servers, cloud computing services or devices belonging to approved members of the Committee.
- Coaches and trip leaders may have contact (email/phone) details for attendees stored on electronic devices for the purposes of running courses/trips, but are expected to delete this information when no longer applicable.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.

Data use

Personal data is of no value to North Avon Canoe Club unless the Club can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- Electronic device storing data is must have login/screen lock password protection. Owners should ensure the screens of their devices are locked when left unattended.
- Personal data must not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Personal data must never be transferred outside of the European Economic Area.

Data accuracy

The law requires North Avon Canoe Club to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort North Avon Canoe Club should put into ensuring its accuracy.

It is the responsibility of all members who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Club members must not create any unnecessary additional data sets.
- Club members must take every opportunity to ensure data is updated. For instance, by confirming a member's details when they contact the Club.
- North Avon Canoe Club will make it easy for data subjects to update the information North Avon Canoe Club holds about them. For instance, via the membership renewal process.
- Data must be updated as inaccuracies are discovered. For instance, if a member can no longer be reached on their stored telephone number or email address, it should be removed from the database.
- Particular attention should be made to any "opt outs" from Club processes and people who have opted out should not be included in these processes. For example, members who opt out of email communication should never be contacted by this method and any email information must be removed from Club records.

Subject access requests

All individuals who are the subject of personal data held by North Avon Canoe Club are entitled to:

- Know what information the club holds about them and why.
- Know how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the club is meeting its data protection obligations

If an individual contacts the club requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email or letter, addressed to the Membership secretary or Chairperson.

Subject access requests will be made free of charge. However, the Club reserves the right to charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive. The fee charged will be based on the administrative cost of providing the information.

The contacted (Membership secretary or Chairperson) will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, North Avon Canoe Club will disclose requested data. However, the Membership secretary or Chairperson will ensure the request is legitimate, seeking assistance from the Club's Chair and Secretary, and from the club's legal advisers where necessary.

Personal data breach

If there is an actual or suspected personal data breach this must be reported to the Committee without delay. The Committee will investigate and determine what action is necessary.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, North Avon Canoe Club will:

- Take action to prevent any further data breaches
- Inform those people adversely effected without delay
- Document the data breach and actions taken
- If appropriate, inform the Information Commissioner's Office within 72hours.
- If relevant, instigate disciplinary proceedings.

Providing information

North Avon Canoe Club aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, the club has a privacy statement setting out how data relating to individuals is used by the club. This is available on request. A version of this statement is also available on the website (<http://www.northavoncanoecub.org.uk/>) a how to find this is stated on membership applications/renewals forms.

Appendix A - Member privacy statement

North Avon Canoe Club takes your privacy seriously and we will only use your personal information for legitimate Club purposes, which may include some or all of the following: administer your membership, keep you informed about Club news, events and fund raising, projects and activities, employment and volunteering opportunities. We will not pass your personal information to third parties except when legally required to do so. We will keep your personal information for 1 years after your membership has lapsed unless you ask us to remove it. We will only contact you by email or telephone if you have given the Club permission to use these methods of communication. Further information regarding our data protection policy can be obtained by contacting the Club directly or from our website (<http://www.northavoncanoecub.org.uk/>).