

SALTAIRE STRIDERS DATA PROTECTION POLICY AND PRACTICE

Policy Statement

1. It is the policy of Saltaire Striders (“the Club”) to take all necessary steps to ensure that personal data held by the Club about its members is processed fairly and lawfully, and that the Club’s internal procedures are monitored periodically to ensure compliance.
2. The Club will implement and comply with the eight Data Protection Principles in the Data Protection Act 1998 (“the Act”) which promotes good conduct in relation to processing personal information. These principles are as follows:
 - Personal Data shall be processed fairly and lawfully.
 - Personal Data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any matter incompatible with the purpose(s).
 - Personal Data shall be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
 - Personal Data shall be accurate and, where necessary, kept up to date.
 - Personal Data processed for any purpose(s) shall not be kept for longer than is necessary for the purpose(s).
 - Personal Data shall be processed in accordance with the rights of data subjects under the Act.
 - Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction, or damage to personal data.
 - Personal Data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Practice

3. The Club is exempt from registration with the Information Commissioner’s Office because (a) we do not have CCTV, and (b) the information we collect is only for use in connection with an amateur sport.
4. The Executive Officer without Portfolio will monitor compliance with this policy, and report to the AGM each year.
5. In collecting information, the Club will only collect that information which is relevant to Club matters.

6. We will collect the following types of information:

- Personal Information: name, address, date of birth, telephone number(s), email address, any other athletic club membership, membership status, performance data, photographs, emergency contacts; and
- Sensitive Information: information on medical conditions and medication, gender, disability.

7. The Club will use information provided by members only for the following reasons:

- The Club Membership Secretary uses the Information to maintain current membership listings as we are required to do by England Athletics.
- Club coaches may access some of the information, particularly that relating to age and medical conditions, to plan training programmes.
- Club coaches need to know of the medical information relating to any athlete to ensure that they do not ask the athlete to undertake any athletic activity which would be harmful to their health.
- The Club Captains may access the Information to compile team lists for competitions, notify athletes and keep records of competitions competed in.
- Club Officers may access the Information to organise other Club activities such as social activities.

8. The Club will release information about members to people outside the Club only in the following circumstances:

- Where there is a legislative requirement to do so.
- Where there is an obvious medical reason to do so.
- In order to meet the requirements of athletic competitions in which the Club is competing.

9. Where information requests are made by a third party the Club will pass onto the third party only that information which is required in order to comply with legislative or competition requirements.

10. Personal and Sensitive Information will be stored in:

- The England Athletics membership database, to which only the Membership Secretary, Club Secretary and Chair will have access.

- A Club Database, maintained by the Membership Secretary and Treasurer in a secure internet environment¹. All Club Officers will have access to this database for the purposes of their office and Club duties only.
11. Club Officers will use their best endeavours to manage Personal and Sensitive Information through the Club Database in order to avoid downloading Information onto personal computers. No Personal and Sensitive Information will be stored or transferred by removable memory devices.
 12. Any access or use of Members' Personal or Sensitive Information outside of the Club Database will be justified by a request to the Executive Officer without Portfolio, not be for longer than required and never for more than 30 days.
 13. Officers will not share Sensitive Information with Club Members. Officers will only share Personal Information with Club members when required for efficient functioning of the club. For example, some or all of names, ages and email addresses are needed to organise teams, entries for races, the Club Championship and social events.
 14. If required for practical reasons, the Management Committee may agree that an alternative Club Officer can access and use Personal or Sensitive Information for a particular task or role.

Approved by the Management Committee on 24th April 2017

¹ WebCollect will be used from 2017 onwards.