

# WELLINGTON (TELFORD) ASC

## DATA PROTECTION & PRIVACY POLICY

May 2018

### Introduction to GDPR – General Data Protection Regulation

The General Data Protection Regulation (GDPR) which came into effect on 25<sup>th</sup> May 2018, describes how organisations such as Wellington (Telford) ASC must collect, handle and store personal information.

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

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

The GDPR is underpinned by eight important principles. These say that personal data must:

- be processed fairly and lawfully;
- be obtained only for specific, lawful purposes;
- be adequate, relevant and not excessive;
- be accurate and up to date;
- not kept for longer than necessary;
- be processed in accordance with the rights of the “Data Subjects”;
- be kept and held securely;
- not be transferred to third parties or other countries without consent.

Further details on the GDPR can be found at the website for the Information Commissioner’s Office ([www.ico.gov.uk](http://www.ico.gov.uk)).

### **1. About this Policy.**

1.1 This policy explains when and why we collect personal information about our members, their parents/guardians, coaches and volunteers. It explains how we use the data, how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Protection Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our website [www.wellingtontelfordasc.co.uk](http://www.wellingtontelfordasc.co.uk) and/or our Club noticeboards regularly for any amendments (amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data.

### **2. Who we are.**

2.1 We are Wellington (Telford) Amateur Swimming Club. Our base is Wellington Leisure Centre, Tan Bank, Wellington, TF1

2.2 We can be contacted at:

[chairperson@wellingtontelfordasc.co.uk](mailto:chairperson@wellingtontelfordasc.co.uk)    [clubsec@wellingtontelfordasc.co.uk](mailto:clubsec@wellingtontelfordasc.co.uk)

or [memberenquiry@wellingtontelfordasc.co.uk](mailto:memberenquiry@wellingtontelfordasc.co.uk)

2.3 For the purposes of the GDPR, we, Wellington (Telford) ASC, will be the “Data Controller”. You, our members, their parents/guardians, coaches and volunteers, will be the “Data Subjects”.

### **3. Our Responsibilities**

3.1 Wellington (Telford) ASC has no formal Data Protection Officer (DPO), nor is it required to have one, but all members of the Committee have a responsibility to ensure data is collected, stored and handled appropriately in accordance with the requirements of the GDPR.

### **4. What information we collect and why.**

*(“encrypted device” means PC, laptop, ipad/tablet, phone, memory stick)*

<b>What information we collect</b>	<b>Why we collect it</b>	<b>Where we collected it from and where we store it</b>
Names, addresses, dates of birth and gender of members	To manage the Club membership and to liaise with ASA. To enter galas.	From: Membership Forms.  On Membership Secretary’s encrypted device and on Competition Secretary’s encrypted device. Head Coach & Treasurer to manager membership and training groups.
Telephone numbers and email addresses of members	To manage the Club membership & subscriptions	From: Membership Forms.  On encrypted device by Head Coach, Treasurer & Membership Secretary.
ASA numbers of members	To manage the Club membership. To enter galas.	From: Membership Forms and/or ASA/Swim England.  On Membership Secretary’s encrypted device and on Gala Coordinator’s encrypted device.
Emergency contact details	To contact in the event of an emergency	From: Membership Forms.  In a folder kept in locked cupboard and with lead coaches and electronically (encrypted) only by those who require the information such as lead coaches.
Record of accidents/incidents & complaints	To fulfil club requirements & resolve complaints	In locked filing cabinet. 2 people have access. Complaints Officer holds on encrypted device.

Bank details of those volunteering as swimming teachers, coaches and other volunteer roles.	To enable online payment of expenses.	From: Volunteers  In the online banking app with Treasurer.
Bank details of swimmers' parents.	To make refunds, for example where a gala entry is rejected.	From: Parents  In the online banking app with Treasurer.
Bank details of other swimming clubs.	To make online payment for gala entries.	From: Other clubs.  In the online banking app with Treasurer.
Bank details of Regional ASA and National ASA.	To make online payments for Open Meet Licences and membership.	From: Regional & National ASA.  In the online banking app with Treasurer.
Photos of swimmers, Committee members and coaching/teaching team	For swimmers, to use with permission for social media, local press and national Swimming Times magazine.  For identification of Committee members on noticeboard poster and for the "Meet the Team" part of the website.	From: Taken at events such as galas, Presentation Evening.  Swimmers' photos kept with Welfare Officer.  Committee members on Chairman's encrypted device.  Coaching/Teaching team on Club website.  Only taken following parent's permission on membership form.
Videos during training sessions.	In the event of video of analysis, videos are deleted after viewing.	From: Coaches using iPad or underwater camera.  Initially viewed on iPad then deleted.
Medical / health information including disabilities, allergies and other relevant issues.	To ensure smooth running of the Club and so key people are aware where need be.	From: Membership Forms.  Welfare Officer, electronically (encrypted) and on paper in locked cabinet.

For para swimmers, details on their disability and their ASA/FINA classifications.	To enable gala entries to include this obligatory information.	From: Swimmer's rankings/biography on ASA website and/or from parents.  Competition Secretary on encrypted device.
Information relating to swimmers' performance and achievement.	To enable progress to be made during training sessions.	From: Collated by Head Coaches.  Head Coach's on encrypted device.
Training data of swimmers.	To enable progress to be made during training sessions.	From: Collated by Head Coaches.  Head Coach's on encrypted device.
Records of qualifications of members, volunteers, teachers and coaches.	To enable the SwimMark representative on committee to complete relevant information at renewals.	From: Provided by coaches, teachers, members and volunteers.  SwimMark Rep's and Workforce Co-ordinator's encrypted devices.
Names, ASA numbers and email addresses of trainee Officials.	To enable contact to be made with regard to ongoing training sessions, also to collect names of those willing to attend at galas each time.	From: Trainee Officials.  Officials' Co-ordinator on encrypted device.
Names, ASA numbers, email addresses and qualification details of qualified Officials.	To enable contact to be made to find willing Officials to attend galas.	From: Officials.  Officials' Co-ordinator on encrypted device.
Copies of documents such as passport, driving licence, utility bills, bank statements.	For verification purposes when processing DBS.	From: People undergoing DBS applications.  Welfare Officer & Vice Chair on encrypted device. Any paper copies kept in locked drawer/ filing cabinet and shredded once DBS has been issued.

Names and email addresses of contacts at other swimming clubs.	To enable networking and interaction between clubs, for example when seeking help or advice.	From: Provided by other clubs or from their websites  Chairman, Club Secretary and County Rep on encrypted device.
Names and email addresses of staff at pool and land-training venues.	To liaise with regard to pool/room bookings, invoicing etc.	From: Provided for us from the venues.  Committee members on encrypted devices.
Swimmers' names with their parents' mobile phone numbers at team events	To be able to contact parent if necessary.	Handwritten on sheet of paper on clipboard during the event, shredded afterwards.
Passwords for Wellington (Telford) ASC website.	To access and update.	From: Created when setting up website.  Website co-ordinator and two committee members, kept on encrypted devices.
Passwords for Wellington (Telford) ASC facebook page.	To access and update as method of communication.	From: Created when setting up facebook account.  Facebook co-ordinator, kept in heads/memory.
Password for Club Twitter account.	To access and update.	From: Created when setting up twitter account.  Two committee members, kept in on encrypted devices.
Passwords for Club bank accounts.	To access and update.	From: Created when setting up bank account. Each person with access has their own chosen password.  Treasurer, kept in heads/memory.

### Sensitive Personal Data

Wellington (Telford) ASC will not collect or store sensitive personal data. This includes data relating to religion, race, sexual orientation, and criminal records and proceedings.

We will obtain and store relevant medical data as well as emergency contact details for the safe running of the Club and only for the period required.

### **4. How we protect your personal data**

4.1 We will not transfer your personal data outside the EEA (European Economic Area) without your consent.

4.2 We use generally accepted standards of technology and security in order to protect personal data from loss, misuse, unauthorised alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to any sort of risk.

4.3 When you transmit information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

### **5. Who else has access to the information you provide us?**

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law.

5.2 We will share your data with the membership department of the ASA/Swim England.

5.3 Following our own hosted galas, we will share your data with the rankings department of the ASA/Swim England.

5.4 We may need to share information without consent if a child is at risk, as per child protection procedures

### **6. How long do we keep your information?**

6.1 We will hold your personal data on our systems while you are a member of the Club and for as long afterwards as is necessary to comply with our legal and welfare obligations. We will review your personal data every year to establish whether we are still entitled to hold it. If we decide that we are not entitled to do so, we will delete/destroy personal data securely.

6.2 We securely destroy all financial information once we have used it and no longer need it.

## **7. Your rights**

**As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership**

7.1 You have rights under the GDPR:

- to access your personal data;
- to be provided with information about how your personal data is processed;
- to have your personal data corrected;
- to have your personal data erased in certain circumstances;
- to object to, or restrict, how your personal data is processed;
- to have your personal data transferred to yourself or to another club in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

If you have any questions, comments or requests with regard to this policy or how we deal with data, please contact the Chair via [chairperson@wellingtontelfordasc.co.uk](mailto:chairperson@wellingtontelfordasc.co.uk)