

## South Central Orienteering Association (SCOA) Data Protection and Privacy Policy

### Who this is for and what does it apply to?

The current Data Protection (DP) regulations were updated in May 2018 to be consistent with European legislation known as the General Data Protection Regulation (GDPR). Data Protection regulations apply to all organisations that hold any information that identifies living people.

This document is for all those who are involved with SCOA activities who are responsible for the processing of personal data.

Data processing applies to personal data recorded in a structured way for their future contact and recording purposes. It applies to the use of the membership system from recruitment onwards, information gathered from the website, activity information forms fundraising information and data required by SCOA for the efficient administration of the sport. It does not apply to incidental naming of people in, for example, minutes of meetings or action lists.

SCOA processes personal data using paper and electronic systems. It works with partner data processors including the British Orienteering Federation and orienteering clubs, banking service providers, Google, Facebook, Dropbox and other similar providers. SCOA has determined that the partner organisations processing data on its behalf are compliant with GDPR as far as it can assess.

### Commitment

SCOA will use its best endeavours to ensure that those involved with the sport in the region are committed to fully complying with the DP rules. This means those involved with SCOA activities (administrators, officers, coaches and other volunteers) will observe this Policy.

### Formal Contact

SCOA *Committee* is the Data Controller. The contact address is [insert].

### The Legal Basis of our Data Processing

SCOA is an unincorporated sports association run by volunteers on behalf of its constituent member orienteering clubs. As such, we have adopted a data policy that we consider appropriate for such an organisation. Those involved in SCOA activities are orienteers of all ages, committee members and volunteers who are generally members of the constitute clubs which SCOA represents.

To achieve the purposes of the Association we process data for our legitimate interests.

Alan 5/9/2019 16:35

**Comment [1]:** Either a generic email address. E.g. secretary @ SCOA.org or whatever. Or "can be obtained from Briish Orienteering"?

This includes processing for the purposes of

- Administration of the Association and its activities
- Governance
- Safety and safeguarding
- Fundraising and public /community relations

This includes processing by holding paper and electronic records, processing with the facilities or our data processing partners and sending communications by paper and electronic means.

We process data for legal reasons which includes for the purposes of

- maintaining safety and safeguarding
- maintaining accounting records

We process data by reason of data subjects' consent

### Special Categories of Personal Data

The personal data of volunteers will include full name and contact details, date of birth and age, records of volunteering and training. Records of service will include roles, training and role reviews. Relevant records will be kept for the management of safety, safeguarding and personnel, financial information about bank accounts, payment of membership and activity fees, donations and the maintenance of records as required by regulations.

### Sharing of Personal Data

Subject to Data Protection regulations the SCOA may share personal data as relevant, with British Orienteering and orienteering clubs to enable to provision of orienteering activities, training opportunities, administration and promotion.

It would be shared to comply with legal requirements when necessary to others when required and security of our processes. This includes medical services.

It will be processed by partner data processors including cloud-based services for the good administration of the SCOA and the achievement of its purposes.

Personal data may be transferred outside the UK and European Economic Area (EEA) through the use of cloud computing systems.

### Confidentiality

All persons with access to personal data are required to maintain that personal data in confidence and not to share it outside a "need to know" basis. All persons with access to personal data are required to agree to a Confidentiality and Data Protection statement. Anyone storing personal

Alan 5/9/2019 16:38

**Comment [2]:** See comment above. We don't need to list the purposes in both places, so either delete this or above paragraph?

Ian Moran 3/12/2019 00:01

**Comment [3]:** I have left both in for clarity

Ian Moran 2/12/2019 23:50

**Comment [4]:** Noted, but the data in question may well include SCJS data and of course more sensitive information such as bank details

Alan 2/12/2019 23:48

**Comment [5]:** Not sure about this heading. I would have thought "Special Categories" would be the more "sensitive data" associated with say SCJS athlete records ...?

Alan 5/9/2019 16:43

**Comment [6]:** Only this? How can we be sure that email or other servers are not based in / mirrored in the US?. And isn't the current web administrator based in the US?

Ian Moran 2/12/2019 23:51

**Comment [7]:** This clause allows for this

information is required to only use devices that are physically secured within their own property, and any mobile devices such as laptops or mobile phone are required to be password protected.

### Safeguarding Partnership

The SCOA is affiliated to British Orienteering, the organisation responsible for orienteering in the United Kingdom and complies with its Policies and Rules. These include the safeguarding processes involving recruitment and safeguarding investigations. Personal information will be passed to British Orienteering for their processes with regard to support and safeguarding. Information will be passed to the Police when there is a relevant matter.

### Subject Access

Any person who is the subject of personal data held by SCOA may make a subject access request by contacting the Data Controller: The request will be processed in accordance with current regulations.

### Not registered with ICO

SCOA handles personal data only for its purposes of maintaining records and as a not for profit organisations, it is not required to notify the Information Commissioners Office (ICO), or to pay the Data Protection fee.

### Rights under Data Protection Regulation

Those on whom data is held have the right:

- **To be informed** about how we process their personal data: this Data Protection and Privacy Policy seeks to provide that information
- To **have any erroneous personal data corrected**: SCOA requests that all members and volunteers should notify any relevant changes and the Association will update the information held without delay,
- To **object to processing**: SCOA will comply with any request as far as possible; some records are maintained for the formal administration of the Association, for safety and for safeguarding purposes when retention of records will be required
- To **restrict processing**: SCOA will comply with any request as far as possible,
- To have your **personal data erased**: SCOA will comply with any such request as far as possible
- To **request access**: SCOA will comply with current regulations
- To **move, copy or transfer** their personal data: SCOA will comply with such a request as far as possible

Alan 5/9/2019 16:45

**Comment [8]:** Are you sure about this one? It is potentially onerous for SCOA

Ian Moran 2/12/2019 23:52

**Comment [9]:** It could be, but doubt many people would seek to do this

## Questions about Data Protection or the use of Personal Data

Any questions or comments about data protection or this policy, notwithstanding your rights above, should be addressed to the Data Controller.

## Internal and Other Directories

The compilation of any directory must have the approval of the Association's Committee. Directories must only contain the information that is held for legitimate interests and is relevant to the purpose of the directory and data that is specifically consented to include. The request for consent must include information about access to or distribution of the directory. The directory must be kept-up to date by a named person.

## Programme, Activity and Training Registration

Personnel will use appropriate and secure methods to gather information for registration. Only information that is necessary for the purpose will be requested.

Information may be gathered by paper or online forms. A data protection statement will be included in the form stating the use of the data and identifying any sharing of that data.

Activity registration data will often form part of relevant training and safeguarding information and will only be kept for the relevant time scale.

## Retention of records

Records will be retained for the good administration of the Association. Further details are provided below. **Comments required**

Data Process	Data Type	Retention	Justification
Coaching Records	Personal data	1 Year after coaching certificate lapses	
Events & Activities	Sensitive data	6 months after event	
Event Officials Records	Sensitive data		
Incident with Medical intervention	Sensitive data	1 Year	In case of further inquiries
Safeguarding	N/A	No retention	All documentation to be provided to British Orienteering as soon as practical
Training records	Sensitive data	2 Years after the person leaves	

Alan 2/12/2019 23:53

**Comment [10]:** Not sure that Events and Events Officials are Sensitive data?

Ian Moran 2/12/2019 23:54

**Comment [11]:** This could include medical data

Alan 5/9/2019 16:49

**Comment [12]:** (which could include medical data)

Ian Moran 2/12/2019 23:54

**Comment [13]:** Medical records would be in the events and activities section above

**Consent for young people**

Consent for young people (under 18’s) to participate in activities and to receive communications will require parental / guardian consent.

**Consent to electronic mailings - unsubscribe**

Mailings may be sent for notification of events, administration and governance. Anyone who wishes not to receive such mailings, providing it is not a requirement, may ask to be excluded from future mailings.

**Communication of this Policy**

This policy should be made available to anyone who requests it.

**Review of this Policy**

This Policy will be reviewed every 3 years or as significant changes in regulations or best practice occurs, whichever is the soonest.

**Agreed**

This Policy was agreed by the SCOA Committee on **[insert date]**

Signed: ..... Date: .....

Chair

Signed: ..... Date: .....

Secretary

