

NSSA DATA PROTECTION POLICY

1.0 Introduction

1.1 **NSSA** collects and uses personal information to support the day to day activities of the club.

1.2 The Data Protection Act 1998 provides safeguards to ensure all personal is collected and dealt with appropriately.

1.3 **NSSA** will ensure that all personal information is treated lawfully and correctly.

2.0 Definitions

Data Controller – The organisation and delegated person(s) who decide what personal information **NSSA** will hold and how such data will be stored and/or used.

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Protection Officer – The person(s) responsible for ensuring that **NSSA** follows its data protection policy and complies with the Data Protection Act 1998

Data Subject/Service User – The individual whose personal information is held by **NSSA**.

'Explicit' consent – agreement is specific, informed and freely given by a Data Subject (see definition) to the processing* of their personal information*. Explicit consent is needed for processing sensitive* data.

* See definitions below

Notification – Notifying the Information Commissioner about the data processing activities. Certain not-for-profit organisations and associated activities may be exempt from notification.

Exemption - Organisations which are established for not-for-profit making purposes can be exempt from registering. The exemption may be appropriate for small clubs, voluntary organisations and some charities. A not-for-profit organisation can make a profit for its own purposes, but the profit should not be used to enrich others. Any money that is raised should be used for the organisation's own activities.

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

Processing – collecting, amending, handling, storing or disclosing personal information.

Personal Information – information about living named persons that enables them to be identified e.g. name and address. It does not apply to information about organisations, companies and/or agencies.

Sensitive data:

- Racial or ethnic origin

- Political opinions
- Religious or similar beliefs
- Trade union membership
- Physical or mental health
- Sexual life
- Criminal record
- Criminal proceedings relating to a data subject's offences

3.0 Data Controller

NSSA and delegated person(s) is the Data Controller under the Act.

NSSA is currently exempt from registration with the Information Commissioner.

4.0 Disclosure

NSSA will only share personal data with the consent of the Data Subject(s).

The Data Subject will be made aware of how and with whom their information will be shared.

There are special circumstances where the law allows **NSSA** to disclose data (including sensitive data) without the data subject's consent.

These circumstances are as follows:

1. Carrying out a legal duty or as authorised by the Secretary of State.
2. Protecting vital interests of a Data Subject or other person.
3. The Data Subject has already made the information public.
4. Conducting any legal proceedings, obtaining legal advice or defending any legal rights.
5. Monitoring for equal opportunities purposes – i.e. race, disability or religion.
6. Providing a confidential service where the Data Subject's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Data Subjects to provide consent signatures.

NSSA will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998.

Specifically, the Principles require that personal information:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,

2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
4. Shall be accurate and, where necessary, kept up-to-date,
5. Shall not be kept for longer than is necessary
6. Shall be processed in accordance with the rights of Data Subjects under the Act,
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. 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 information.

NSSA will, through appropriate management, strict application of criteria and controls:

- Observe fully, conditions regarding the fair collection and use of information,
- Meet its legal obligations to specify the purposes for which information is used,
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements,
- Ensure the quality of information used,
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken,
 - The right of access to one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information,
- Take appropriate technical and organisational security measures to safeguard personal information,
- Ensure that personal information is not transferred abroad without suitable safeguards,
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information,
- Set out clear procedures for responding to requests for information.

5.0 Data collection

Informed consent

Informed consent is when

- A Data Subject clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- and then gives their consent.

NSSA will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, **NSSA** will ensure that the Data Subject:

- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used

6.0 Data Storage

Information and records relating to Data Subjects will be stored securely and will only be accessible to authorised volunteers.

Information will be stored for only as long as it is needed and will be disposed of appropriately.

It is **NSSA's** responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

7.0 Data access and accuracy

All Data Subjects have the right to access the information **NSSA** holds about them. **NSSA** will also take reasonable steps ensure that this information is kept up-to-date by asking Data Subjects whether there have been any changes.

In addition, **NSSA** will ensure that:

- A Data Protection Officer with specific responsibility for ensuring compliance with Data Protection is appointed,

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice,
- Everyone processing personal information is appropriately trained to do so,
- Everyone processing personal information is appropriately supervised,
- Anybody wanting to make enquiries about handling personal information knows what to do,
- It deals promptly and courteously with any enquiries about handling personal information,
- It describes clearly how it handles personal information,
- It will regularly review and audit the ways it hold, manage and use personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the **NSSA** Data Protection Officer:

Signed:

Position:

Date:

Review Date

DATA PROTECTION PROCEDURE

1.0 Data Collection and Data Subjects

1.1 **NSSA** collects and uses personal information to support the day to day activities of the club.

1.2 The Data Protection Act 1998 provides safeguards to ensure all personal is collected and dealt with appropriately.

1.3 **NSSA** will ensure that all personal information is treated lawfully and correctly.

1.4 All personal information held by **NSSA** is confidential and can only be accessed for a specific purpose and with the relevant authority.

1.5 **NSSA** collects data for the following purposes:

- establishing and maintaining membership
- administering activities for **NSSA** members

1.6 Personal data held by **NSSA** covers the following Data Subjects:

- **NSSA** members
- Coaches
- Committee members and volunteers

1.7 **NSSA** is responsible for:

- The appointment of a Data Protection Officer.
- Ensuring all Data Subjects give consent for the collection and storage of personal data.
- Regularly checking with Data Subjects that information is accurate and up-to-date.
- Ensuring all Data Subjects are aware of how and with whom their data will be shared; including the circumstances when data may be disclosed without consent.
- Ensuring authorised volunteers understand their obligations in relation their obligations in relation to data protection.

1.8 All data subjects are responsible for:

- Checking that information provided to **NSSA** is accurate.

- Informing **NSSA** of any changes to the information that they have provided.
- Checking the information sent out from time to time is accurate.
- Informing **NSSA** of any errors or changes to their personal data.
- Giving or refusing permission to take and store photographs.

1.9 The following personal data is stored:

- Names
- Addresses
- Telephone numbers
- Email addresses
- Photographs
- Photocopy of passport

1.10 **NSSA** personal data is stored in one or more of the following ways:

- Electronic data held on **NSSA** owned computer
- Electronic data held on Committee Members' Computers
- Paper documentation

2.0 Security measures for the storage of personal data.

2.1 The following measures are taken to prevent accidental or unauthorised removal, access, loss, destruction, damage or processing of data.

- Paper records are kept to a minimum and all paper records are held in locked cabinets/cupboards.
- All paper records are securely destroyed (shredded) as soon as they are no longer needed.
- All mobile telephones which hold personal data are password protected.
- All IT/computer equipment is password protected.
- All electronic data is password protected.
- All personal data is removed from old computers through the use of technology or by destroying the hard disc.

3.0 Data Protection Officer

3.1 The **NSSA** Data Protection Officer ensures compliance with the Data Protection Act 1998, and regularly reviews the management and storage of personal data.

3.2 Data Subjects have a right to see their stored personal data. The **NSSA** Data Protection Officer will provide details of stored personal data on request. Information will be provided within 15 days.

3.3 Only personal data relating to maintaining club membership and administration of club activities is stored. All non-essential data is destroyed.

4.0 Lost/Stolen Data

4.1 Lost or stolen data should immediately be reported to the **NSSA** Chair and **NSSA** Data Protection Officer.

4.2 The **NSSA** Data Protection Officer will ensure the following people are informed:

- Data Subjects
- Police as appropriate

4.3 The **NSSA** Data Protection Officer will review the circumstances of the loss and make recommendations for improvements in practice as appropriate.

Procedure reviewed
Review date.....