

# Bough Beech Sailing Club

## Data Protection Guidelines

### 1. Introduction

- a. Bough Beech Sailing Club has a legal duty to protect people's personal data under the Data Protection Act 1998 (DPA 1998).
- b. Personal data is data which relates to a living individual who can be identified from that data. Personal data includes peoples contact information and photographs. Sensitive personal data includes information on people's medical history, ethnic origin and criminal record.
- c. For guidance on any matters relating to the DPA 1998 please approach the Secretary.
- d. There are eight data protection principles which need to be complied with when using or storing personal data:

Personal information should be

- Fairly and lawfully processed
- Obtained only for specified and lawful purposes
- Adequate, relevant and not excessive
- Accurate and kept up to date
- Not kept longer than necessary
- Processed in line with the rights of data subjects under the Act
- Secure
- Not transferred to other countries without adequate protection

### 2. Collecting Membership and Duties Information

- a. BBSC will only collect information necessary and provide members with information on how this information will be stored and used.
- b. Information must be stored securely in accordance with the DPA 1998 including any web based storage arrangements.
- c. The Club must ensure membership information records are up to date and accurate.
- d. The Club shall only use personal information collected for the purposes of running the club. The Club shall not use or allow use for other purposes such as marketing.
- e. The Club shall only disclose personal information to a third-party duty management system called DutyMan. The Club shall not disclose personal information to other third parties without the consent of the individual concerned.
- f. The Club shall ensure secure destruction of information no longer required in accordance with the table set out in paragraph 10.

### 3. Collecting Personal Information for Open and Training Events

- a. The Club shall only collect personal information which is considered necessary to enable Club officials and volunteers to run such event.
- b. The booking form for an Open or Training Event shall include the following wording:

Training Course wording:

***'Data Protection Act 1998. The above information including the questions as to your health and ability will be used by us to process your booking for the course (including payment processing) and for attending to your safety whilst you are on one of our courses. Names and addresses of candidates for RYA courses may also be shared with the RYA.***

***If you object please tick here***

***We shall also include your name and address on our mailing list. If you do not want to receive details of future courses and events please tick here***

Open Event wording:

**Data Protection Act 1998. The above information will be used by [insert name of race organiser] to process your race entry (including payment processing) and to deal with you as a competitor. Occasionally we take photos of competitors for publicity purposes, including for use on our website [and/or the websites of the race sponsors [insert name]]. If you object please tick here \_.**

**We shall also include your name and address on our mailing list. If you do not want to receive details of future similar events please tick here \_.**

- c. Store securely – there is a locked cupboard in the club house office. All documents containing personal information must be kept in this locked cupboard. This is particularly important for documents containing sensitive personal information such as medical information or health declarations.
  - d. Only use personal information collected for the purposes of running the training/open event and to contact the individual in respect of participation in future events of a similar type and who have not objected to receiving emails regarding future events.
  - e. If a participant in an event notifies the data processor that they object to receiving emails regarding future events, the data processor must ensure they are not included on any database for future events.
  - f. Do not disclose personal information to third parties without the consent of the individual concerned.
4. Collection of Other Personal Information during Club Duties
- a. Completed Accident forms should be deposited in the green locked box provided in the club house office. The Rear Commodore shall review these forms on a regular basis and they shall be stored in a file in the locked cupboard.
  - b. Completed boat hire forms should be deposited in the black locked box (along with the payment) provided in the club house office.
  - c. General Committee members using personal information from the above documents must ensure that it is used in line with the DPA 1998 principles including secure destruction when no longer needed. For guidance on any matter please approach the Secretary.
5. Collecting Sensitive Personal Information for safeguarding purposes
- a. The safeguarding officer at BBSC will be responsible for appropriate collecting, storage and destruction of sensitive personal information for safeguarding purposes and ensuring this is in compliance with the DPA 1998.
6. DutyMan
- a. BBSC subscribes to DutyMan which is a third-party duty management processing system. In order for the Club to function effectively every member is required to perform duties and these are managed by DutyMan.
  - b. For DutyMan to function the following Personal Information is available on the DutyMan system and every Member gives implied consent for this Personal Information to be available on the DutyMan system and for all Members to have access to this Personal Information:
    - a. Full name of Member;
    - b. Members email address;
    - c. Members mobile or landline telephone number;
    - d. The duty that Member has been allocated.
7. Contacting Groups by Email
- c. Do not disclose personal email addresses to others without the consent of the individual concerned. Use blind copy to address emails to large groups to avoid disclosing personal email addresses to the whole group.
  - d. Only use email contact lists for the purpose they were obtained and with the consent of those involved. Do not allow a contact list to be used for other purposes such as marketing.

- e. Ensure any contact list is kept up to date and email addresses are deleted when no longer relevant.
8. BBSC official email addresses
- It is implied that members of the Sailing Committee and General Committee have given consent to their contact details to be made available to the Members.
  - Committee members and class captains should be offered a BBSC official email address to use for BBSC business. Official email addresses are listed on the BBSC website. Contact the website co-ordinator for advice on the use of these emails.
  - In the event of a third party wishing to contact a Committee member, official BBSC emails addresses should be supplied.
9. Use of Photograph's identifying individuals
- Only use photographs showing individuals in Club publications, website and publicity with the consent of the individuals involved.
  - All Members give their consent on the membership application form and unless they notify the Membership Secretary on the membership form they are deemed to have consented to the use of photographs.
  - The Membership Secretary shall hold an up-to-date list of those Members who have not consented to the use of photographs of themselves. Any website co-ordinator should check with the Membership Secretary before up-loading any photographs.
  - The membership secretary will obtain and record consent from club members and event organisers will obtain it from visiting participants.
  - Members and visitors are free to decline consent for photographs from which they can be identified being used so do not use photographs of individuals without checking that consent has been obtained
  - Avoid labelling of photographs with other identifying information such as names wherever possible
10. Retention time and destruction of Documents containing Personal Information
- All documents contained personal information should only be retained for the time required as set out in the table below.
  - All documents should be destroyed on expiry of the retention time stated below. Hard copy documents should be shredded in the shredder provided and computer files should be deleted, including deletion of all back up files.

Document	Retention time	Secure storage?	Secure destruction?	Comments
Membership Application Forms	12 months from end of membership period	Y	Y	
Open Event Entry Forms	3 years following the event	Y	Y	
Training Event Sign Up Forms	3 years following the event	Y	Y	
Training Event Medical Forms	3 years following the event	Y	Y	
BBSC Boat Hire Forms	12 months following date of hire	Y	Y	
Visitors Book	6 years from last date inserted in the book	Y	Y	New books to be provided annually
DBS Spreadsheet	3 years from end of relevant year	Y	Y	
GC Nomination Forms	6 years from date of nomination	Y	Y	To be retained with the minutes
Letters to Club containing sensitive personal information	Recommended period is 3 years from date of letter	Y	Y	This is to be assessed on a case by case basis
Fixture Lists in BBSC Possession	12 months from end of relevant year it covers	Y	Y	

Class/Youth Distribution lists	6 months following the end of the last session for the relevant season	Y	Y	
Accident Forms	12 years from date of accident	Y	Y	
OOD Daily Record Sheet	6 years from date of sheet	Y	Y	
Safety Boat Checklists	6 years from date of sheet	N	Y	
Membership Database	6 years from end of relevant year	Y	Y	
Minutes of GC	Permanently	Y –full minutes N – redacted minutes	N/A	To be retained permanently
Minutes of Members meetings	Permanently	N	N	To be retained permanently
Attendance Sheets	Permanently	N	N/A	
Lease	12 years following termination	Y	N	
Trust Deeds	Permanently	Y	N/A	
Accounting records	6 years following the end of the relevant period	Y	Y	
Insurance policies	Permanently	Y	N/A	

#### 11. All Members are responsible

- a. All members are responsible for ensuring that personal information they come into contact with whilst involved with the Club is dealt with in accordance with these guidelines.
- b. Member should ensure that personal information is not retained for any longer than required and that any personal information is either handed to the relevant GC member or destroyed in accordance with these guidelines.
- c. In the event any member is unsure how to deal with any item of personal information they may have or receive they should approach the Secretary for guidance.

#### 12. Data processed in the cloud

- a. In the event that an individual Member acting on behalf of the Club stores personal data in the cloud they should satisfy themselves that the personal data will be secure if it is outsourced to a cloud provider. In particular they should ensure that the cloud provider will only process the data in accordance with their instructions and that the cloud provider has appropriate security measures in place to ensure that any personal data is not exposed to unauthorised access, alteration or destruction.
- b. In the event that the cloud provider is located outside the European Economic Area the individual Member must ensure there is a written contract in place with the cloud provider.

#### 13. Subject Access Request

- a. All subject access requests should be made to the Data Controller or the Secretary who shall manage such subject access request in accordance with the Data Protection Act 1998.
- b. The time limit for responding to a subject access request shall be as set out in the legislation, currently a maximum of 40 days.