

# Data Protection Policy



This policy applies to

- Disability Sport Glasgow: executive committee; athletes and volunteers;
- all DSG donors, sponsors, and supporters; and
- any other person, persons, entity or entities doing work for or on behalf of DSG.

## Introduction

The purpose of this policy is to enable DSG to:

- comply with the law in respect of the data it holds about individuals;
- follow good practice;
- protect DSG's athletes, staff, volunteers, sponsors/donors, and other individuals
- protect the organisation from the consequences of a breach of its responsibilities.

## Brief introduction to UK Data Protection Act 2018 and UK GDPR

UK Data Protection Act 2018 and UK GDPR was a principle-based legal structure and the GDPR continues that approach. This means rather than a set of rigid rules, the law gives broad principles that will be applied differently by different organisations depending on their circumstances.

The Data Protection Act gives individuals the right to know what information is held about them enhanced by GDPR detailing how that information is used and with whom the information may be shared and why. It provides a framework to ensure that personal information is handled properly and to support DSG when an individual exercises their rights in respect of the data it holds.

The following are the six data principles contained in the GDPR:

1. Lawfulness, fairness and transparency;
  - What data do we store and where? How often, in what format?
  - What to do if an individual asks to see their data?
2. Purpose limitations;
  - All data collected must be justified on the basis of one of the lawful purposes.
3. Data minimisation;
  - How will we ensure that we collect the minimum amount of data for our lawful purpose?
4. Accuracy;
  - How will we review data periodically or otherwise ensure accuracy?
5. Storage limitations;
  - What will we retain, for how long and why?
  - What will we remove and how often / when will we do this? and
6. Integrity and confidentiality;
  - What measures are in place to protect data that is held?
  - Do we take back ups?
  - How often and how long do we keep them for?

The second area covered by the Act provides individuals with certain rights, including the right to find out what personal information is held about them by the Data Controller, either on computer or paper records.

## **Policy statement**

DSG will:

- comply with both the law and reasonable standards of good practice
- respect individuals' data privacy rights
- be open and honest with individuals whose data is held
- provide training and support for all staff and volunteers who handle personal data, so that they can act confidently and consistently

DSG recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. Information about athletes, staff, volunteers, and sponsors/donors will be used fairly, securely and not disclosed to any person unlawfully.

Secondly, the Act aims to ensure that the legitimate concerns of Data Subjects about the ways in which their data may be used are taken into account. DSG will be open and transparent in its use of Personal Data.

DSG is the Data Controller and is registered under the Data Protection Act 1998. All processing of personal data will be undertaken in accordance with the data protection principles.

## **Definitions**

The Data Subject is the individual whose personal data is being processed. Examples include:

- athletes (past & present)
- volunteers (past & Present)
- sponsors/donors
- suppliers

Processing means the use made of personal data including:

- obtaining and retrieving
- holding and storing
- making available in furtherance of DSG's objectives
- printing, sorting, matching, comparing, and destroying.

Data Controller - the legal 'person', or organisation, that decides why and how personal data be processed. The Data Controller is responsible for complying with the Data Protection Act.

The Data Processor – the Data Controller may get another organisation to be their data processor, in other words to process the data on their behalf. The responsibility of what is processed and how, remains with the Data Controller and the data processor must faithfully comply with the Data Controller's instructions. DSG aims to always put in place a written contract with the Data Processor who must have appropriate security.

The Data Protection Officer - the name given to the person in organisations who is the central point of contact for all data compliance issues.

## **Responsibilities**

DSG Executive Committee recognises its overall responsibility for ensuring that DSG complies with its legal obligations.

The Data Protection Officer has the following responsibilities:

- Briefing the Executive Committee on Data Protection responsibilities;

- Reviewing data protection and related policies;
- Advising staff and SOGB membership on Data Protection issues;
- Ensuring that data protection induction and training takes place ;
- Handling subject access requests;
- Approving non-standard disclosures of personal data;
- Ensuring contracts with Data Processors have appropriate data protection clauses;
- Ensuring data protection statement is uploaded and displayed on the website;
- Approving data protection-related statements on publicity materials and letters .

Each member of the Executive Committee and volunteer at DSG who handles personal data will comply with the organisation's operational procedures for handling personal data to ensure that good data protection practice is established and followed.

All Executive Committee members and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Significant breaches of this policy will be handled under DSG's disciplinary procedures.

### **Confidentiality**

Because confidentiality applies to a much wider range of information than Data Protection, DSG has a separate Confidentiality Policy. This Data Protection Policy should be read in conjunction with DSG's Confidentiality Policy.

DSG has a 'Privacy Notice' for Data Subjects, setting out how their information will be used. This is available on request, and a version of this statement will also be used on the DSG web site.

Executive Committee members and volunteers are required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities.

In order to provide some services, DSG may need to share users' personal data with other agencies (Third Parties). Written agreement will always be sought from the user before data is shared.

Where anyone within DSG feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done after discussions with the Data Protection Officer. All such disclosures will be documented.

### **Security**

This section of the policy addresses security issues relating to personal data.

Any recorded information on athletes, volunteers, staff, and sponsors will be:

- Kept in locked cabinets or a locked case;
- Protected by the use of passwords if kept on a computer or other electronic devices; and
- Destroyed by shredding or other secure methods if no longer needed.

Access to information on the main database is controlled by a password and only those needing access are given the password. The Executive Committee and volunteers should be careful about information that is displayed on their computer screen and make efforts to ensure that no unauthorised person can view the data when it is on display.

Notes regarding personal data of users should be shredded or destroyed.

### **Data Recording and storage**

DSG has a single database holding basic information about all athletes and volunteers. Data is held on an encrypted safe stick and kept securely.

DSG regularly reviews its procedures for ensuring that its records remain accurate and consistent and, in particular:

- The database system is reviewed and re-designed, where necessary, to encourage and facilitate the entry of accurate data;
- Data on any Data Subject will be held in as few places as necessary, and all Executive Committee members and volunteers will be discouraged from establishing unnecessary additional data sets. Effective procedures are in place so that all relevant systems are updated when notified about changes to a Data Subject's personal data;
- Staff and volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.; and
- Data will be corrected if shown to be inaccurate

### **Access to data**

All athletes, volunteers, Executive Committee members and sponsors have the right to request access to all information stored about them. Any subject access requests will be handled by the Data Protection Officer within the required time limit.

Subject access requests must be in writing. All staff and volunteers are required to pass on anything which might be a subject access request to the Data Protection Officer without delay.

Where the individual making a subject access request is not personally known to the Data Protection Officer their identity will be verified before handing over any information.

The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

Volunteers have the right to access their file to ensure that information is being used fairly. If information held is inaccurate, the individual must notify the Data Protection Officer or DSG Chairperson so that this can be recorded on file.

### **Transparency**

DSG is committed to ensuring that in principle Data Subjects are aware that their data is being processed and

- for what purpose it is being processed;
- what types of disclosure are likely; and
- how to exercise their rights in relation to the data.

Data Subjects will generally be informed in the following ways:

- Athletes: on the athlete membership form;
- Volunteers: in the volunteer membership form;
- Sponsors/donors: on the sponsor agreement; and
- Standard statements will be provided to volunteers for use on forms where data is collected.

Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory.

### **Consent**

Information, including personal data, but excluding sensitive personal data, about volunteers will be made public according to their role, and consent will be sought for (a) the means of contact they prefer to be made public, and (b) any publication of information which is not essential for their role.

Information about athletes will only be made public with their consent. (This includes photographs, live streaming other digital images.)

'Sensitive' data about athletes (including health information) will be held only with the knowledge and consent of the individual.

Consent should be given in writing, although for some services it is not always practicable to do so. In these cases, verbal consent will always be sought to the storing and processing of data. In all cases it will be documented on the database that consent has been given & when.

All Data Subjects will be given the opportunity to opt out at any stage of their data being used in particular ways.

DSG acknowledges that, once given, consent can be withdrawn, but not retrospectively. There may be occasions where DSG has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.

### **Data Security Breach Policy**

In the event of a breach, it is vital that appropriate action is taken to minimise associated risks.

DSG has a Data Security Breach Policy, this document outlines the breach detection, investigation and internal reporting procedures for DSG Executive Committee to decide whether or not to notify affected individuals

### **Training and acceptance of responsibilities**

All Executive Committee members and volunteers that have access to personal data will be given copies of all relevant policies and procedures during their induction process, including the Data Protection Policy, Confidentiality Policy and the operational procedures for handling personal data. All will be expected to adhere to all these policies and procedures.

DSG will provide opportunities for staff to explore data protection issues they may come across and procedural queries through training, team meetings, and supervisions.

### **Policy review**

The policy will be reviewed in January each year by the Data Protection Officer and approved by the Executive Committee in advance of DSG's Annual General Meeting. It will also be reviewed in response to changes in relevant legislation, contractual arrangements, good practice or in response to an identified failing in its effectiveness.

### **Associated documents**

- Data Security Breach Policy;
- Privacy Notice;
- Volunteer Confidentiality Notice.

**Data Protection Officer contact details can be found on the DSG website:**

**[www.disabilitysportglasgow.org](http://www.disabilitysportglasgow.org)**

### **Document Control**

Approved by: DSG Executive Committee

Approval Date: October 2023

Review Date: April 2025