

SHROPSHIRE ASA
DATA PROTECTION & PRIVACY POLICY
May 2018

Introduction to GDPR – General Data Protection Regulation

The General Data Protection Regulation (GDPR) which comes into effect on 25th May 2018, describes how organisations such as Shropshire ASA 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).

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.shropshire-asa.com 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 Shropshire Amateur Swimming Association Our base is The County Secretary’s home address, Currently C/O Mrs Mandy Garrott, Stoneyford House, Burlington Court, Burlington, Shifnal, Shropshire TF11 8BW

2.2 We can be contacted at mandygarrott@btinternet.com or via other links on our website.

2.3 For the purposes of the GDPR, we, Shropshire ASA, will be the “Data Controller”. You, our members, their parents/guardians, coaches and volunteers, will be the “Data Subjects”.

3. Our Responsibilities

3.1 Shropshire ASA 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)

What information we collect	Why we collect it	Where we collected it from and where we store it
Names, addresses, dates of birth and gender of members	To manage the County membership and to liaise with ASA. To organise events.	From: Affiliated clubs and entry forms. On specific Event Coordinators encrypted device.
Telephone numbers and email addresses of members	To manage the County membership	From: Affiliated Clubs and entry forms. On specific Event Coordinators encrypted device.
ASA numbers of members	To manage the County membership. To organise events.	From: Affiliated clubs and/or ASA/Swim England. On specific Event Coordinators encrypted device.
Emergency contact details	To contact in the event of an emergency	From: Affiliated Clubs and entry forms. In a folder kept with Event Coordinator.
Record of accidents/incidents	To fulfil county requirements	In Welfare Officers secure folder
Details of some swimmers' passports, numbers, issue dates etc (those attending overseas swim camp)	To enable airline/hotel booking for overseas training camps	From: Parents of swimmers attending overseas camp. Event Coordinator and selected Team Manager.

Bank details of some swimmers' parents, not all	To make refunds, should an event be cancelled.	From: Parents In the online banking app with Treasurer.
Bank details of other swimming clubs.	To make online payment for refunded 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 gala licences and officials licences.	From: Regional & National ASA. In the online banking app with Treasurer.
Details entered when ordering County merchandise online, for example clothing sizes.	Where County merchandise is ordered to County Chair	From: Order from County members. Kept in a secure folder.
Photos of swimmers, Committee members and Volunteer County members.	For swimmers, to use with permission for social media, local press and national Swimming Times magazine. For identification of Committee members on Social media & Website	From: Taken at events such as galas, Presentation Evening. Swimmers' photos kept with County Welfare Officer. Coaching/Teaching team on Club website.
Medical / health information including disabilities, allergies and other relevant issues.	To ensure smooth running of the County Events and so key people are aware where need be.	From: Application forms Event Coordinator & County Welfare Officer, electronically (encrypted) and on paper in secure folder.
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. Event Coordinator on encrypted device.
Records of qualifications of members, volunteers, teachers and coaches.	To ensure any County event is staffed by the relevant qualified people.	From: Provided by coaches, teachers, members and volunteers. Event Coordinator in secure folder.

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.
Names and email addresses of contacts at all County 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 County Secretary on password protected device.
Passwords for Shropshire ASA ASC website.	To access and update.	From: Created when setting up website. Executive Committee members
Passwords for Shropshire ASA facebook page.	To access and update as method of communication.	From: Created when setting up facebook account. 1 member from each club to act as Administrator.
Passwords for County bank accounts.	To access and update.	From: Created when setting up bank account. County Treasurer.

Sensitive Personal Data

Shropshire ASA 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 a County Event 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.

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

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 County Secretary, mandyjgarrott@btinternet.com.