



Version 1.0

Data Protection Policy

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Record of Change

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North Highland Harriers

Data Protection Policy

Introduction

North Highland Harriers (NHH) has a legal responsibility¹ and moral obligation to appropriately use, store and protect the personal data of the members. This policy details how NHH fulfil this legal responsibility and moral obligation.

Reason

In accordance with General Data Protection Regulations (GDPR), NHH has undertaken an assessment of its legal basis for processing personnel data. The conclusion of this assessment is that the legal basis² for NHH processing personnel data is contract. The substantiation for this conclusion is that NHH provides the benefits to its members³ for a membership fee and without this data NHH could not reasonable provide these benefits. The benefits include, but are not limited to:

- a) 3rd party insurance⁴ when undertaking NHH events
- b) structure training sessions
- c) a winter trail series.

To ensure that individuals have an entitlement to these benefits, for which they have paid, NHH needs to be able to positively identify its members. It is also not possible to provide suggestions for races and other benefits without contact details.

The personnel data NHH will hold, which have been assessed to be the minimum necessary to allow NHH to fulfil its obligations to the members, and fulfil Scottish Athletics requirements⁵ are:

- Name
- Address
- Age
- Gender

¹ Regulation (EU) 2016/679 of the European Parliament (General Data Protection Regulations) and the Data Protection Act 2018

² As defined in General Data Protection Regulations

³ These are detailed in the NHH Members Guidelines

⁴ The insurance is provided through UK Athletics, and to be covered an individual must be a member of a UK Athletics affiliated club.

⁵ It is assumed that Scottish Athletics as the governing body only request the minimal data necessary to fulfil their legal requirements and obligations as a governing body.

- e-mail address⁶
- Medical Conditions
- Emergency Contact (Junior Members only)

In the context of race/run results, which only contain name, gender and age category this is not considered to be personal data.

Use of Personnel Data

NHH undertakes to only use the personnel data in connection with providing NHH members services/benefits connected with endurance running. NHH will not provide this data to third parties, with the exception of what it has to fulfil legal obligations, Scottish Athletic requirements⁷ and to provide the defined benefits.

Protection of Personnel Data

NHH undertakes to protect the personal data it holds. The minimum protection requirements are detailed below.

NHH will only hold records for 6 years following cessation of membership. If an individual renews the timescales are reset.

Cloud Held Data

To utilise third party 'Clouds' to hold personnel data, NHH will only use a reputable supplier, with a record of appropriate data protection. Once a reputable supplier has been selected⁸ any changes needs the endorsement of the NHH Committee. A review will be undertaken by the Data Protection Lead no greater than 3-yearly intervals.

Individuals accessing this data on the Cloud must only do so when connected to a trusted private network, which is password protected. The individual must ensure that anyone else using that network will not attempt to access the NHH data.

It is assumed that the supplier of the Cloud has appropriate protection for personnel records, and these will be above what is required for NHH data.

The device being used to access the data must have anti-virus software and firewalls installed and in use.

Electronic Storage

NHH permits identified members to hold personnel data on their own computer systems, if the following requirements are implemented

- a) The device is only connected to private networks protected by a password
- b) The files are password protected

⁶ e-mail is requested to minimise paper usage, hence minimise NHH carbon footprint and costs. A member does not need to provide an e-mail address.

⁷ In its role as a Governing Body

⁸ The current supplier is Gmail, which has been assessed as appropriate.

- c) Others able to access the network which the device is connected are assessed as not to pose a threat to NHH personnel data.
- d) the device has proprietary anti-virus software and firewalls installed and in use

It is acceptable to e-mail files, so long as the e-mail addresses belong to reputable companies/organisations.

Paper Records

For any records held in paper, the records must be secured when not being used. The level of security required depends where the records are being stored, those where members of the public can access must be locked in a box/cabinet/drawer from which if data was compromised it would be identifiable. Out of public access the records should be stored such as they cannot be read or accidentally combined with other documents. It is considered in this instance a unlocked drawer/cabinet which only holds NHH information is suitable.

It is permissible to send records by Royal Mail or other reputable courier so long as it is not obvious on the envelope that it contains personnel data. Acknowledgement of receipt should be received.

Paper records must be destroyed by either shredding or burning.

Special Data

The details of any medical conditions that members have will only be provided to those individuals with an identified reason to know the information. When provided to third parties⁹ the data will be collected from the third party once their requirement to hold it has passed.

Some members of NHH have been identified as undertaking Regulated Work¹⁰, this requires that sensitive data is held on these members. In accordance within the provisions of the PVG Scheme, NHH uses Scottish Athletics, in the role of Governing Body, to undertake the PVG checks and hold the necessary data. Mutual Assurance is taken that Scottish Athletics has appropriate arrangements for the protection of this data.

Risk Assessment

It has assessed that with the controls above implemented there is Very Low probability¹¹ of the data held be NHH being targeted by criminals or other parties. The consequences to individuals if the data held by NHH was compromised is also assessed to be Very Low. Therefore using the Risk Template at Annex A this Risk is assessed as Acceptable, with no improvements necessary.

Data Protection Lead

NHH will appoint a Data Protection Lead, their role is to be responsible for this policy and its continued implementation and to tact as the central point of contact for any data protection

⁹ This is only likely to be the provider of First Aid Cover at events.

¹⁰ As defined by the Disclosure Scotland Protection Vulnerable Groups (PVG) scheme.

¹¹ Limited No of individuals with the data not being sensitive, and NHH having a very low profile out with Caithness.

questions/queries. They will also act as the NHH point of contact for the investigation of any breach of data.

The Data Protection Lead does not need to be a NHH member, it is acceptable to share this resource with Scottish Athletics or Thurso Sports Hub.

Due to the size of NHH it has been assessed as not being feasible in appointing a Data Protection Officer, as it is not reasonable to expect someone to have the requisite skills and knowledge to undertake the role appropriately. NHH is not in the position (as a volunteer only organisation) due to the complexities of the legislation to train someone for this role. It is assumed this level of support would be provided by the Governing Body.