

DATA PROTECTION POLICY



SKIFF RACING ASSOCIATION

FINAL, 2018

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1. INTRODUCTION

1.1 Background

The Skiff Racing Association (SRA) is aware of the need for lawfully protecting the rights and privacy of individuals. The Regulation (EU) 2016/679 General Data Protection Regulation (GDPR) [Ref. 1] is applicable as of May 25th, 2018 in all member states of the EU to harmonize data privacy laws across Europe and governs the use of information about people (personal data). The British government Data Protection Act 2018 [Ref. 2] supplements the GDPR and applies a broadly equivalent regime to certain types of processing to which the GDPR does not apply.

The SRA needs to collect and use certain types of Data in order to carry on our association business. This personal information must be collected and dealt with appropriately.

Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs.

The SRA Secretary will remain the data **controller** for the information held. The committee and volunteers will be personally responsible for **processing** and using personal information in accordance with the GDPR.

Committee members and volunteers, who have access to personal information, will be expected to read and comply with this policy.

1.2 Purpose of this document

The purpose of this document is to set out the Skiff Racing Association (SRA) policy and procedures for protecting personal data. The committee regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with.

1.3 Registration with UK Information Commissioner's Office (ICO)

It is understood from the information available from the UK ICO that the SRA **is not required** to register with the ICO as it is a **not-for-profit** organisation meeting the following criteria, downloaded from the ICO website in April 2018.

“You do not have to register if organisation was established for not-for-profit making purposes and does not make a profit or if your organisation makes a profit for its own purposes, as long as the profit is not used to enrich others. You must:

- only process information necessary to establish or maintain membership or support;
- only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
- only share the information with people and organisations necessary to carry out the organisation's activities. Important - if individuals give you permission to share their information, this is OK; and

- only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration.”

1.4 Requirement for a designated Data Protection Officer (DPO)

It is understood there is **no requirement for the SRA to designate a named Data Protection Officer** as the SRA does not meet the necessary criteria, as defined in Article 39 of the GDPR [Ref. 1], as at October 2018:

“(1) The controller and the processor shall designate a data protection officer in any case where:
a) the processing is carried out by a public authority or body, except for courts acting in their judicial capacity;
b) the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale; or
c) the core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to Article 9 and personal data relating to criminal convictions and offences referred to in Article 10”

Notes:

- The SRA is not a public authority or body, but is the controller and the processor of personal data.
- The SRA does not process or monitor data subjects on a large scale
- The SRA does not process any special categories of personal data e.g. health / welfare records or criminal records.

2. PERSONAL INFORMATION COMPILED, HELD AND PROCESSED BY THE SRA

2.1 Personal Data Records

The personal data compiled, held and processed by the SRA is provided in the following table:

Personal Data Held	Source of Data	Who shared with (“recipients”)
Club Captains, Vice Captains, Regatta Organisers & SRA Committee Members Names Addresses Telephone Numbers E-mail Address	Provided by the individual Club Captains, Vice Captains, Regatta Organisers and SRA Committee Members for distribution. (Approx. 30 individuals).	Club Captains, Vice Captains, Regatta Organisers & SRA Committee Members
SRA Umpires & Judges Names Addresses Telephone Numbers E-mail Address	Provided by the individual SRA Umpires & Judges for distribution. (Approx. 25 individuals)	Club Captains, Vice Captains, Regatta Organisers, SRA Committee Members and SRA Umpires & Judges.
Skiff Racers Status Record Event Description Winners Names Club Gender Race Results Skiffing Race Status Points	Provided as race results by Regatta Organisers (Approx. 200 individuals)	All Skiff Club Captains & Vice Captains. Summary of season end results sent to British Rowing Almanack for publication.

2.2 Description of Data Processing

The processing carried out on the data is as follows:

Club Captains, Vice Captains, Regatta Organisers & SRA Committee Members

- Data provided by individuals (name, address, telephone numbers, E-mail addresses) is recorded, on an annual basis.
- The recorded data is distributed to all the individuals contained within the record, to facilitate communication between the Skiff Racing Clubs, Regatta organisers and SRA Committee members, on an annual basis.

SRA Umpires & Judges

- Data provided by individuals (name, address, telephone numbers, E-mail addresses) is recorded, on an annual basis.

- The recorded data is distributed to all the individuals contained within the record and to Club Captains, Vice Captains, Regatta Organisers & SRA Committee Members, to facilitate communication for organisation of regattas, on an annual basis.

Skiff Racers

- Data of race wins for individuals are provided by Regatta Organisers (club, name, gender, skiff category) to the SRA which is compiled on a continuous basis into a record of the individuals' accrued skiff race points in each skiff category.
- This record is distributed to all Club Captains & Vice Captains to facilitate their crew compositions and entries for skiff events, on at least an annual basis.

2.3 Risk and consequence of any data breach

The personal data recorded, organised and then distributed by the SRA is the minimum information required in order to facilitate the communications necessary for Skiff Racing. The personal information does not include any profiling or financial information. If any data breach were to occur the risk is the exposure of the contact details of a small number of people (approx. 30), and is unlikely to result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage. The severity of any consequence to a breach is therefore very low.

If the Record of Race Wins were breached and or accidentally erased, there would be inconvenience but there are no foreseeable severe consequences to the rights and freedoms of individuals or skiff clubs. The record of race wins is recorded each year within the British Rowing Almanack, and records of race wins in recent years can also be sought from the relevant Regatta Organisers, so a detailed record could be recreated if required.

2.4 Data Protection

Taking into account the likelihood and consequences of any data breach (Section 2.3), the SRA Secretary shall ensure that personal data, if held electronically, is password protected, and back-up to a secure separate hard drive or similar.

Any hardcopy records are normally held by the SRA secretary at their home, so the likelihood of this information being targeted to be stolen or of being accidentally destroyed is very low.

3. COMMUNICATING PRIVACY INFORMATION

Privacy information is provided to individuals at the time of collecting personal data from them. Individuals are supplied with information including:

- The name and contact details of the SRA,
- purposes for processing their personal data,
- the lawful basis of the processing
- the retention periods for that personal data,
- and who it will be shared with.

Contact Details of SRA data Controller: secretary@skiffing.org.uk

Personal data provided will be used for the purpose of compiling contact information for distribution to Skiff Club Captains, Vice Captains, Skiff regatta Organisers, SRA Umpires & Judges and SRA Committee members in order to facilitate the communications necessary for Skiff Racing.

Personal data will be retained while the individuals remain as Club Captains, Vice Captains, Regatta Organisers, SRA Committee Members, SRA Umpires & Judges or Skiff Racers. Relevant personal data will be erased at their retirement from an official capacity or when requested to be erased by the individual Skiff Racer.

All requests for access, rectification, erasure, restriction or objection in connection with personal data held by the SRA should be made by contacting the SRA Secretary.

4. INDIVIDUAL RIGHTS

The GDPR includes the following rights for individuals with reference to any personal data held by an organisation:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

The SRA supports the rights listed above.

5. ACCESS RIGHTS

The SRA Secretary shall be the data “controller” for management of any requests from individuals with regards the list of rights (See Section 4) associated with their personal data, and shall comply to an individual’s personal data request within 1 calendar month.

If a request is refused, the SRA Secretary must inform the individual why and that they have the right to complain to the supervisory authority (ICO) and to a judicial remedy. This must be done without undue delay and at the latest, within one month.

6. LAWFUL BASIS FOR PROCESSING PERSONAL DATA

Consent to process personal data, provided by individuals, and recorded prior to implementation of GDPR 25th May 2018, and need not be refreshed.

Post 25th May 2018 consent to process personal data of new individuals will be required. The SRA Secretary will ensure as far as reasonable possible that this consent is sought and will be specific, granular, clear, prominent, opt-in, properly documented and easily withdrawn. See Section 3, for appropriate Consent text.

Notwithstanding the foregoing, it can reasonably be assumed that the individuals providing Personal Data (Contact details) to the SRA will be fully aware that this data will be collated and distributed as described in Section 2.1 & 2.2 as part of their participation in organising, officiating or competing in Skiff Racing. Personal Data processing is necessary for the purposes of the legitimate interests pursued by all individuals involved in Skiff Racing.

7. CHILDREN

The SRA does not offer online services to children or process their personal data.

The SRA does record the name and race win of a child provided by Regatta Organisers, but does not record or share any personal data of that child, other than a description of race wins.

8. INTERNATIONAL

The SRA does not source, provide or process personal data across international borders.

9. REFERENCES

- Ref. 1 The Regulation (EU) 2016/679 (General Data Protection Regulation) in the current version of the OJ L 119, 04.05.2016; cor. OJ L 127, 23.5.2018.
- Ref. 2 Data Protection Act 2018, 23 May 2018