



Kent Netball Data Protection Policy

Policy Name	Kent Netball Data Protection Policy
Responsible Officer	Chairperson
Group Owner	KNMC
Date created/modified	01/05/2021
Version	1.1
Review date	01/05/2024
Applicable for	This policy is mandatory. It applies to all members of Kent Netball and volunteers acting in any capacity within netball where a separate policy does not exist.
Summary	This policy provides information on Kent Netball's Data Protection Policy and outlines the organisation's aim to manage data in a GDPR compliant manner.

Version Control

Person Responsible	Version and summary of changes	Date
Dawn Cox	First Version. Kent Netball Data Protection Policy_v1.0	01/05/21
Dawn Cox	Data Retention - Storage of photographs/video added. Kent Netball Data Protection Policy_v1.1	01/05/21

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Abbreviations

AGM	Annual General Meeting of Kent Netball
EN	England Netball
INF/IFNA	The International Netball Federation (INF), formerly the International Federation of Netball Associations (IFNA), is the worldwide governing body for Netball.
KN	Kent Netball
KNMC	Kent Netball Management Committee
L&SE	London and South East
RMB	Regional Management Board

1. Policy Statement

Kent Netball (KN) needs to hold certain data on its members, participants and volunteers, to carry out its day-to-day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal data will be collected and used fairly, stored safely and not disclosed to any other person unlawfully as well as disposed of safely. Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The aim of this policy is to ensure that everyone handling personal data on behalf of KN is fully aware of the requirements and acts in accordance with data protection procedures.

This document also highlights key data protection procedures within the organisation for which training will be provided.

The requirements of this policy are mandatory for all members, participants and volunteers, and the authorised third parties who have access to personal data.

It is a requirement of KN that members adopt and implement this policy.

A copy of this policy and procedures will be given to all KNMC members upon their election/appointment to the KNMC and to all other relevant volunteers as part of their induction.

In the course of administering its business in connection with this policy, KN may need to process both personal data and special categories of personal data.

The Chairperson is responsible for ensuring that this policy is implemented effectively. The Data Protection Lead is responsible for the day-to-day implementation of the Policy. All other KNMC members are expected to facilitate this process.

A record of revisions of this policy will be recorded in the Kent Netball Documents – Version Control Register.

KN is not required to have a Data Protection Officer. Queries regarding this policy should be directed as indicated in the Relevant Contacts section.

2. Definition of Terms

Data Protection Lead	Mrs Dawn Cox Secretary@kentnetball.co.uk
DPA	Data Protection Act 2018
GDPR	General Data Protection Regulation
ICO	Information Commissioner's Office
Privacy Notice	A statement made to a data subject that describes how KN collects, uses, retains and discloses personal data.
Processing	Obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept digitally.
Personal Data	Data relating to a living individual ('data subject') who can be identified, directly or indirectly by the data.
Special Category Data	GDPR defines special category data as:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;
- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

This does not include personal data about criminal allegations, proceedings or convictions, as separate rules apply.

Data Subject An individual who is the subject of personal data.

3. Application

KN Netball will:

- ensure that the legal basis for processing personal data is identified in advance and that all processing complies with the law;
- not do anything with the data that would not be expected given the content of this policy and the privacy notice;
- ensure that appropriate privacy notices are in place advising members, participants and volunteers how and why their data is being processed, and, in particular, advising data subjects of their rights;
- only collect and process the personal data that it needs for purposes it has identified in advance;
- ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible;
- only hold onto the personal data for as long as it is needed, after which time KN will securely erase or delete the personal data – KN's data retention at laid out in this Policy Section 5 sets out the appropriate period of time; and
- ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely.

KN will ensure that all volunteers who handle personal data on its behalf are aware of their responsibilities under this policy and that they are adequately trained.

4. Type of data processed

The data KN collects will vary depending on the relationship with the Data Subject.

KN processes the following personal data:

- Full name and personal details (e.g. photograph, driving licence);
- Contact data (e.g. home address, email address, telephone numbers);
- Date of birth and/or age;
- Special categories of data such as medical history or race or ethnicity, disability or sexual orientation;
- Next of kin and emergency contact data;
- Imagery in video and/or photographic form and voice recordings;
- Records of participation at events/sessions/competition;

- Records of enquiries and other correspondence with you;
- Marketing email lists;
- Membership details including start and end date and any regions, counties, leagues and clubs that you are/have been a member of;
- Coaching/teaching/officiating qualification and/or history;
- Records of any courses or sessions attended/enquiries;
- Records and assessment of any player rankings, gradings or ratings, competition results, details regarding events/matches/games attended and performance;
- Any disciplinary, safeguarding and grievance data;
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Any payment details you provide so that KN can perform financial transactions with you;
- Any details required for the purposes of awarding scholarship funding or grants (including any means testing);
- Records of your attendance at any events or competitions hosted by us;
- Membership of the KNMC, Subcommittees and Working Groups
- Membership of Academies
- Names of Covid-19 Officers for member County clubs.

5. Data Retention

KN stores personal data on a computer database. The personal data may be held in both paper file and computer file form. KN will implement measures of a reasonable nature to ensure that all personal data is securely stored from misuse, loss and unauthorised handling.

KN will hold personal data only for as long as needed for the purpose it was collected, which is as follows:

- Financial data – 7 years
- Disciplinary data – 5 years
- Participation in leagues – 2 seasons
- Injury Forms – minimum of 3 years or until the child reaches 21
- Course attendance/qualification – 5 years
- Correspondence/enquiries – for the relevant season or, if later, until resolved or for such longer period as required
- Names of Member County club Covid-19 officers – for the relevant season
- Academy Athlete details – whilst active in the programme after which only names will be retained for historical purposes
- Safeguarding data – until the matter is closed or, in the case of child protection cases, until the child is 24
- Zoom recording of meetings – 3 months.
- Photographs/video – may be held indefinitely for archiving purposes.

At the end of the relevant retention period or when any data is no longer required, it will be deleted. Where an individual has consented for KN to retain data, KN will only hold the data for the duration of the consent.

6. Roles and Responsibilities

The Data Protection Lead shall be responsible for, and be able to demonstrate, compliance with the principles of the GDPR.

Commented [DC1]: I would add in a separate section for images. We need to be able to keep photos for archiving purposes. Perhaps a compromise is U18s 7 years, adults routinely 7 years, those of historical public interest indefinitely?

Responsibility for personal data in KN rests with the KNMC.

The KNMC delegates tasks to the Data Protection Lead who is responsible for:

- understanding and communicating obligations under the Act;
- identifying potential problem areas or risks; and
- producing clear and effective procedures.

All members, participants and volunteers and authorised third parties who process personal data must ensure they not only understand but also act in line with this policy and the data protection principles.

Breaching this policy may result in disciplinary action. Obtaining (including accessing) or disclosing personal data in breach of the Kent Netball Data Protection Policy may also be a criminal offence.

7. Privacy Notices

KN will provide Data Subjects with the Kent Netball Privacy Notice relevant to the activity concerned, which will set out in detail what personal data KN will hold, how the personal data may be used and the reasons for these uses, together with details of the Data Subject's rights.

8. Training

Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:

- New volunteers will be provided with a copy of this Policy.
- The Data Protection Lead will train and update volunteers on a regular and ongoing basis.

9. Data Security

KN will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- password protection on personal data files;
- not allowing personal data to be taken out in public (as hard copy, on laptop or on memory stick) without specific authorisation from the Data Protection Lead;
- where specifically authorised by the Data Protection Lead, personal data taken off site must remain in the possession of the authorised person and all reasonable care must be taken to keep the data safe;
- back up of data on computers (onto a separate hard drive) must be password protected;
- password protected attachments for personal data sent by email and the password shared securely by an alternative method;
- the security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data; and
- paper copies will be held securely and anonymously shredded once no longer required.

10. Subject Access Requests

Anyone whose personal data KN processes has the right to know:

- What data KN holds and process on them
- How to gain access to this data
- How to keep it up to date
- What KN is doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase data regarded as wrong.

Any person wishing to exercise this right should apply in writing to the Data Protection Lead.

A charge may be applied to process the request in line with ICO guidance.

The following data will be required before access is granted:

- Full name and contact details of the person making the request;
- their relationship with the organisation;
- Any other relevant data - such as what data is required and why.

Data about children may be released to a person with legal guardianship. However, the best interests of the child will always be considered.

Before responding to a request for data held about a child, the Data Protection Lead will consider whether the child is mature enough to understand their rights. Data Protection Lead is confident that the child can understand their rights, then they will respond to the child rather than the parent. What matters is that the child is able to understand (in broad terms) what it means to make a subject access request and how to interpret the data they receive as a result of doing so.

KN may also require proof of identity before access is granted. One form of ID will be required such as Passport or Driver's Licence.

Queries about handling personal data will be dealt with swiftly and politely. KN will aim to comply with requests for access to personal data as soon as possible, but will ensure it is provided within the month required by the Act from receiving the written request (and relevant fee if appropriate).

11. Relevant Contacts

KN is not required to have a Data Protection Officer. For information and queries about data protection compliance, contact our Data Protection Lead.

Data Protection Lead, Dawn Cox: secretary@kentnetball.co.uk

12. Review of Policy

The KNMC will review this policy at three-year intervals.

Amendments to the policy are permitted at any time following a decision of the KNMC, which must be minuted.

