

BVF Data Protection Policy

1. Aims of this Policy

British Veterans Fencing (BVF) needs to keep certain information on its members to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

BVF is committed to ensuring any personal data is dealt with in line with the Data Protection Act 1998 and the GDPR requirements in force from May 2018. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within BVF.

This policy covers members and individuals representing or undertaking work for BVF.

In line with the Data Protection principles, BVF ensures that personal data will:

- Be obtained fairly and lawfully
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

2. Types of Information Processed

BVF processes the following personal information:

- Details of members

All personal information is kept in the BVF membership database.

BVF has a privacy statement which sets out how data will be used, and is in Appendix A.

BVF has a framework which sets out how information is processed, which is in Appendix B.

3. Responsibilities

Under the Data Protection Guardianship Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of BVF, this is the elected committee which appoints a Data Controller.

The Data Controller is responsible for:

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

All of those who process personal information must ensure they understand and act in line with this policy and the data protection principles.

All committee members, members and supporters must sign a confidentiality agreement as appropriate when working for or on behalf of BVF. The agreement is in Appendix C.

Breach of this policy may result in people being personally liable for any penalties arising from the breach.

4. Policy Implementation

To meet our responsibilities BVF will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely.

5. Key Risks

BVF has identified the following key data risks:

- a) Breach of confidentiality (information being given out inappropriately), which is managed through the provision of training.
- b) Breach of security of the membership database, which is managed by restricting access to the database and making communications between user and data secure.
- c) Personal data being entered inaccurately or becoming out of date, which is managed by regular contact with/review by members.

6. Subject Access Requests

Anyone whose personal information BVF processes has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

Anyone whose personal information BVF processes has the right to:

- Prevent processing of their personal data in some circumstances
- Correct, rectify, block or erase information regarded as wrong
- Access certain personal data being kept about them on computer and certain files

7. Policy Approval and Review

This Data Protection and Confidentiality policy was approved by the Committee:

Approved: 14 January 2018

To be reviewed: 2022

Appendix A

BVF PRIVACY STATEMENT

When you apply to become a member of British Veterans Fencing (BVF) we obtain data about you. This statement explains how we look after that data and what we do with it. This statement should be read in conjunction with the BVF Data Protection and Confidentiality Policy.

BVF has a legal duty under the Data Protection Act 1998 and the GDPR requirements in force from May 2018 to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Normally the only data we hold comes directly from you. We would like to contact you to:

- tell you about our events
- send you our newsletter
- provide you with information on fencing matters
- alert you to opportunities to find out about or take part in relevant activities
- tell you about ways in which you might like to support BVF.

You have the right to ask us not to contact you about these things by writing to the BVF Chairman at the address below. Whenever we collect data from you, we will make it clear how we intend to use the data. You do not have to provide us with any additional information unless you choose to.

BVF will not publicise or share your information with any other organisation or individuals without your consent. You may change or withdraw your permission to use your information, but not retrospectively. To change or withdraw your permission write to the BVF Chairman at the address below.

Our member data is stored securely in our membership database. We restrict access to those who have a need to know, and we train these people in handling the information securely.

You have the right to a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy, write to the BVF Chairman at the address below. You may be required to provide proof of identity. We aim to reply as promptly as we can and, in any case, within the legal maximum of 30 days.

The Chairman

Gillian Aghajan Email: g.aghajan@virgin.net.....

Appendix B

BVF DATA PROCESSING FRAMEWORK

1. Introduction

This framework describes in detail the approach BVF use to processing data. It should be read in conjunction with the BVF Data Protection and Confidentiality Policy, which contains further information.

This document is the HOW TO part and the Policy is the PRINCIPLES part

2. Types of Information Processed

BVF processes the following personal information:

- Contact details of members

Data is collected in line with our privacy statement to allow contact on the following topics:

- our meetings/events,
- sending our newsletter
- alerting about relevant activities such as training camps

Personal information will not be used for purposes outside of the permissions given for its use. Data will not be shared with any other organisation or individual without consent. Permission to use information can be withdrawn, but not retrospectively.

The following personal information may be processed:

Name
Address
Contact preferences: email/post
Date of birth *
Gender
Phone numbers
E-mail address
British Fencing membership number
Home country

* This is not required now. FIE, EVF and BF competitions that are age categorised and calculate a competitor’s age based on a qualifying date of 31 December. So all we need to store is the year the member was born.

All personal information is kept in the BVF membership database. BVF has a privacy statement which sets out how data will be used, and is in Appendix A.

People within BVF who will process personal information are:

- The membership secretary
- The database administrator
- The chairman
- BVF committee members
- Managers of BVF events
- Managers of other events that have veteran fencers participating

Information processing is completed within this framework:

- The Membership Secretary and Database Administrator have full access to the database. They can enter or update details about any person. They can use the database to make contact with members by email or post.
- Event organisers may request a list of veteran fencers names so that they can award a veterans prize. This information is extracted from the database by the Membership Secretary and sent in electronic form to the event organiser.
- The BVF committee has access to the database to enable them to contact members eg to raise a team for a competition.
- All access is password controlled and communications are secure

3. Gathering and checking information

Before personal information is collected, we will consider:

- That the data is reasonable to request
- That the planned use of the data is described and given to those involved

4. Accuracy

BVF will ensure that its records remain accurate and consistent. In particular:

- IT systems will be designed to encourage the entry of accurate data
- Data on any individual will be held in as few places as necessary, and all committee members, event managers and volunteers will be directed not to establish unnecessary additional data sets
- Effective procedures will be in place so that data is updated when information about any individual changes.

5. Data Security

BVF 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:

- Personal data is stored in a secure database system with limited access
- Paper membership forms are destroyed once the applicants details are entered into the database
- Connection to the membership database will be encrypted using SSL

6. Retention Periods

BVF will retain data as follows:

- Member information will be retained for two years after the member fails to renew membership. The Membership Secretary will then delete the information.
- BVF paper financial records will be retained for six years. The Treasurer will then destroy them.
- Summary information on membership and finances will be archived and retained indefinitely.

Appendix C

BVF CONFIDENTIALITY AGREEMENT

When representing British Veterans Fencing (BVF), you may need to have access to personal information about BVF members.

BVF is committed to keeping this information confidential. Confidentiality requires that access to this information is on an authorised need to know basis. You must assume that all information about members is confidential.

You may use only the information you have been authorised to use, and for purposes that have been authorised. You should be aware that unauthorised access to data about individuals is a criminal offence. This agreement should be read in conjunction with the BVF Data Protection and Confidentiality Policy which provides further information.

You must:

- Not compromise or seek to evade security measures (including computer passwords)
- Be careful when sending information to other authorised individuals.
- Not gossip about confidential information with any other person.
- Not disclose information unless you are sure the recipient is authorised to have it.
- Securely keep any personal information you are authorised to have.
- Not retain member information for longer than it is necessary to do so.

Unless authorised, you must not pass on information to any other person whether involved in BVF or otherwise. If you are in doubt about whether to disclose information you should withhold the information while you check with an appropriate person that the disclosure is appropriate.

Breach of the BVF Data Protection and Confidentiality policy may result in you being personally liable for any penalties arising from the breach.

Your confidentiality obligations continue to apply indefinitely after you have stopped representing BVF.

I have read and understand the above statement. I accept my responsibilities regarding confidentiality.

Signed:

Date:

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