



Grand Western Archery Society

Data Protection Policy and Procedures (GDPR)

<i>Responsible for review of policy:</i>	<i>Responsible for review of procedures:</i>
G.W.A.S. Council	G.W.A.S. GDPR Point of Contact

Change History				
<i>Version:</i>	<i>Sections approved:</i>	<i>Approved by:</i>	<i>Date of approval:</i>	<i>Next review date:</i>
01	Policy & Procedures	Council	05 MAY 2018	MAY 2019

Policy

Grand Western Archery Society (hereafter denoted by the initials G.W.A.S..) is fully committed to compliance with the requirements of the Data Protection Act 1988 and subsequent law such as General Data Protection Regulations (GDPR). It is also committed to compliance with the “EU Cookie Directive” (containing in 2009/136/EC of the European Parliament and of the Council)

G.W.A.S. needs to collect and use certain types of information about its members. This personal information must be dealt with appropriately however it is collected, recorded and used; this principle applies whether on paper, on a computer or recorded by other means. There are safeguards to ensure this in the Data Protection Act 1998 & GDPR.

G.W.A.S. regards the lawful and correct handling of personal information as essential and therefore ensures that personal information is treated with sensitivity at all times. To this end, G.W.A.S. fully adheres to the principles of data protection as detailed in the Act and relevant regulations.

These specify that personal data must be:

- Processed fairly and lawfully;
- Obtained for specified and lawful purposes;
- Be adequate, relevant and not excessive;
- Be accurate and kept up-to-date;
- Not be kept any longer than necessary;
- Be processed in accordance with the data subject’s (the individual’s) rights;
- Be kept secure; and
- Not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.

G.W.A.S. will, through appropriate management, strict application of criteria and controls:

- Fully observe the conditions regarding the fair collection and use of the information;
- Meet its legal obligations to specify the purpose for which the information is used;
- Collect and process only that information which is required in order to fulfill operational needs or the compliance of legal requirements;
- Ensure the quality of all information used;
- Apply strict checks to determine the length of time information is held;
- Ensure the rights of people about whom information is held can be fully exercised under the Act, that includes the right to be informed that processing is being undertaken, the right of access to one’s personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information;
- Ensure that appropriate technical and organizational security measures are in place to safeguard such personal information;
- Ensure that no transfer of information is made abroad without suitable safeguards being in place;
- Treat people impartially and fairly irrespective of their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information; and
- Have in place clear procedures for responding to requests for information.

In addition to the above, G.W.A.S. will ensure that:

- There is a volunteer with specific responsibility for Data Protection;
- All volunteers responsible for managing and handling personal information understand that they are responsible for following good data protection practice;
- All volunteers managing and handling personal information are appropriately trained to do so;
- Procedures are in place so that anybody wanting to make enquiries about handling personal information knows what to do;
- All volunteers deal with queries concerning personal information promptly and courteously;
- Methods of dealing with personal information are clearly described;

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- Monitor and review the way personal information is held, managed and used;
- The methods of handling personal information are regularly assessed and evaluated;
- All volunteers are aware that any breach of the rules and procedures relating to Data Protection may lead to disciplinary action; and
- This policy document forms part of the induction process for new volunteers.

In relation to the “EU Cookie Directive”, G.W.A.S. will ensure that:

- Users give consent to the download of Cookies on to their computing devices.

G.W.A.S. will review this policy at least annually and ensure it is brought to the attention of all volunteers, to ensure best practice in data management, security and control and to ensure compliance with changes or amendments made under the Data Protection Act 1988 or those of the European Union such as the General Data Protection Regulation.

Procedures

This section outlines the procedures that G.W.A.S. will put in place to meet the legal requirements of the Data Protection Act 1998 and the GDPR 2016/679.

1. Fair obtaining and processing.

G.W.A.S. will, as far as practicable, ensure that all individuals whose details we hold are aware of the way in which that information will be held, used and disclosed. Individuals will, where possible, be informed of the likely recipients of the information, whether the recipients are internal or external to G.W.A.S.. Processing within G.W.A.S. will be fair and lawful; individuals will not be misled as to the uses to which G.W.A.S. will put the information given. If a person feels they have been deceived or misled as to the reason for which their information was collected, they should use the complaints procedure at the end of the document.

G.W.A.S. will publish a privacy notice, which details how individual's data is collected, held & processed. This is available at [link web location](#) and will be updated on a regular basis.

Collection forms requiring personal information will contain a 'fair obtaining' statement giving details of the likely uses of the information and, where information is collected in person or by telephone, the volunteer asking for the details will tell the individual how those details will be used. People are free to ask the person collecting the information why they want the details and what they will be used for.

If a person's details are going to be used for "auto-decision" processing (where a computer decides something based on a score or other information) the person will be told about how the system works and whether the decision can be challenged.

Any person whose details are to be included on G.W.A.S.'s web site will be asked to provide consent. At the time the information is included, all such individuals will be properly informed about the consequences of their data being available worldwide.

2. Data uses and processes.

G.W.A.S. will not use or process personal information in any way that contravenes its notified purposes or in any way that would constitute a breach of Data Protection law. Any new purposes introduced will, where appropriate, be notified to the individual and, if required by law, their consent will be sought.

All volunteers and or authorised agents using personal data within or on behalf of G.W.A.S. will be told the limits of their authority to use and disclose such information.

Where a new process or system is being planned, please ensure that G.W.A.S. GDPR Point of Contact is informed. There may be a requirement for a Data Protection Impact Assessment (DPIA) to be carried out, and the planned processes reviewed.

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3. Data quality and integrity.

G.W.A.S. will not collect data from individuals where that information is excessive or irrelevant in relation to the notified purpose(s). Details collected will be adequate for the purpose and no more. Information collected, which becomes (over time or by virtue of changed purposes) irrelevant or excessive, will be deleted.

Information will only be held for as long as is necessary for the notified purpose(s), after which the details will be deleted. Where details of individuals are stored for long-term archive or historical reasons and where it is necessary to retain the personal detail within the records, it will always be done within the requirements of the legislation. In many cases personal details will be removed from the record so that individuals cannot be identified.

G.W.A.S. will ensure, as far as it is practicable, that the information held is accurate and up-to-date, and it is the intention to check wherever possible the details given.

Information received from third parties (i.e. neither the individual concerned, nor G.W.A.S.) will carry a marker indicating the source. Where a person informs G.W.A.S. of a change of their own circumstances, such as home address or non-contentious data, their record(s) will be updated as soon as possible. Where the individual requests that information be changed, or asks that it be stopped being processed, and it is not possible to update it immediately, or where the new information needs to be checked for its accuracy or validity, a marker will be placed on the disputed record indicating the nature of the problem. G.W.A.S. and the individual will attempt to reach an amicable agreement on the complaint, but where this is not possible the G.W.A.S. complaints procedure will be implemented.

4. Technical and organisational security.

G.W.A.S. has implemented appropriate security measures as required by GDPR. In particular, unauthorised volunteers and other individuals are prevented from gaining access to personal information.

A full review of G.W.A.S.'s data handling procedures and processes has been carried out, all new processes are expected to be designed to be inherently protective and where relevant will have gone through a formal DPIA.

It is also important to stress the need to ensure that data in transit, whether in electronic or paper form, is kept secure.

Computer systems are installed with user-profile type password controls and, where necessary, audit and access trails to establish that each user is fully authorised. In addition, volunteers are fully informed about overall security procedures and the importance of their role within those procedures. Manual filing systems are held in secure locations and are accessed on a need-to-know basis only.

Security arrangements are reviewed regularly, all reported breaches or potential weaknesses are investigated and, where necessary, further or alternate measures will be introduced to secure the data. Such reports are received by G.W.A.S., which will liaise with whoever necessary to resolve breach or potential weakness.

All volunteers are informed and frequently reminded about the limits of their authority on disclosing information, both inside and outside G.W.A.S.. Details will only be disclosed on a needs basis within G.W.A.S.. Where details need to be passed outside G.W.A.S., it will generally be done with the person's consent, except where this is not possible or where it is required by law, allowed under Data Protection Act exemptions (such as crime prevention/detection, to prevent injury, etc) or where it is in the person's vital interests. Any unauthorised disclosure will be dealt with under G.W.A.S.'s disciplinary procedures.

Redundant personal data will be destroyed by G.W.A.S... In general, paper waste is shredded and magnetic media (disks, tapes, etc) are either electronically "wiped" or physically destroyed beyond recovery.

5. Subject access/subject information requests.

Any person whose details are held/processed by G.W.A.S. has a general right to receive a copy of their own information. There are few exceptions to this rule, such as data held for child protection or crime detection/prevention purposes, but most individuals will be able to have a copy of the data held on them.

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Completion of a 'subject access request' is required to obtain the information.

The request must also be made in writing. Any codes used in the record will be fully explained; any inaccurate, out of date, irrelevant or excessive data will be dealt with under the procedures outlined previously in this policy.

G.W.A.S. will attempt to reply to subject access requests as quickly as possible and in all cases within one month as set out in the GDPR.

Repeat requests will be fulfilled unless the period between is deemed unreasonable, such as a second request received so soon after the first that it would be impossible for the details to have changed.

A subject access/information request should be submitted on the appropriate form; this will ensure that G.W.A.S. has the required information to be able to conduct a data search and to fulfil the request. In some cases, further information may be required from the requester, which may delay the start of the one month maximum time limit.

6. Further information, enquiries and complaints.

G.W.A.S.'s Honorary Secretary is the first point of contact on any of the issues mentioned in this policy document. The Honorary Secretary will be responsible for dealing with all internal and external enquiries. Where possible, requests for detailed information should be put in writing.

All complaints should be written, dated and should include details of the complainant as well as a detailed account of the nature of the problem. G.W.A.S. will attempt to complete internal investigations within 10 working days and in any case the person will receive an acknowledgement of the complaint as soon as possible.

Complaints should be sent to:

Honorary Secretary,
Grand Western Archery Society,
Firbank,
Water Street,
Mere,
Wiltshire BA12 6DY

G.W.A.S. GDPR point of contact: Mr. T. Jackson, communications@gwas.org.uk