

The Wallingford Sports Trust

Policies and Procedures

25.0 Data Protection Policy

1. Data Protection Principles

The Wallingford Sports Trust (“The Trust”) is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR).

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

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2. General Provisions

- This policy applies to all personal data processed by the theTrust.
- The Responsible Person shall take responsibility for the Trust's ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Trust shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair and transparent, the Trust shall maintain a register of all systems or contexts in which personal data is processed by the Trust (Personal Data Register). See Appendix 1.
- This register shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to the Trust shall be dealt with in a timely manner.

4. Lawful purposes

- All data processed by the Trust must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- The Trust shall note the appropriate lawful basis in the Personal Data Register.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Trust's systems.

5. Data minimisation

- The Trust shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- The Trust shall take reasonable steps to ensure personal data is accurate.

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- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Data Retention

- To ensure that personal data is kept for no longer than necessary, the Trust has put in place a Data Retention policy in which personal data is processed and will review this process annually.
- The Data Retention Policy considers what data should/must be retained and for how long.

8. Security

- The Trust shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Trust shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

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Appendix 1 – Personal Data Register

	Who is the personal information about ?	Type of personal information	Why we hold this information	Lawful basis of processing	Where is it held ?
1	Employees	Name Address Bank details NI number DOB	To process payroll	Legal obligation	On Sage Online banking system Personnel files Telephone contacts
2	Casual Bar Staff	Name Address NI number DOB	To process payroll	Legal obligation	Sage
3	Trustees	Name Address Email Address DOB	To communicate in support of the effective running of the Charity	Legal obligation to register with Charities Commission.	Secretary's files Treasurer's files
4	Customers (Hall Hire, AWP)	Name Email Address	To deal with any booking details	Contractual	Sage
5	Suppliers	Name Email Address	To facilitate ongoing supplies and services	Contractual	
6	Club Contacts	Name Email Address Telephone number	To deal with day to day Sports Park queries	Legitimate interest	Notice boards Telephone contacts

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7	Grant funders /SODC	Name	Grant and funding applications	Contractual	Email contacts
		Email Address			
8	Style Acre volunteers	Name	Volunteering	Legitimate interest	Telephone contacts
		Telephone number			
		Email Address			
9	Photos	Photos of members of the clubs	Promotional material	Legitimate interest and sometimes Consent.	

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