

# **GDPR Policy**

Version	1
Name of responsible (ratifying)	Sports Coaching Group Management Team
Document Manager (job title)	Operations Director
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Electronic location	Sports Coaching Group Policies
Related Procedural Documents	All Sports Coaching Group Policies

#### 1. Statement of intent

1.1. Sports Coaching Group is strongly committed to protecting the privacy of all employees, sub-contractors, clients and partners, along with complying with their choices. Both personal and non-personal information is safeguarded according to the highest privacy and data protection standards. We have always had a robust and effective data protection procedure in place which complies with existing law and abides by the data protection principles. However, we recognize our obligations in updating and expanding this program to meet the demands GDPR

## 1.2. Our Commitment

- Your information will not be shared, rented or sold to any third party
- We give you the possibility to control the information that you shared with us (opt-out)
- We will securely store your information to protect your information against unauthorised users

Sports Coaching Group is committed to processing data in accordance with its responsibilities under the GDPR

- 1.3. Article 5 of GDPR requires personal data shall be;
- 1.3.1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
- 1.3.2. 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;
- 1.3.3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- 1.3.4. 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 recified without delay;
- 1.3.5. 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 be 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 an organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- 1.3.6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

### 2. Notice

2.1 We will clearly inform you when information that personally identifies you ("personal information") is asked for you and you will have the choice to provide it or not. This information will usually be requested when applying for a job, updating staff records, logging on to our website or signing up for activities, amongst other services.

## 3. Usage

- 3.1 We will use your personal information for the following purposes
  - To provide you with information that will allow you to access our services
  - To personalize documents with your information.
  - To process payment for employees, subcontractors and partners.
- 3.2 We will store and use all emergency contact details for all participants of our services for the duration of the activities that participants have signed up to attend.

### 4. Consent

4.1 When you provide your personal information, you consent that it can be used for the above purposes and that Sports Coaching Group is an authorized holder of such information. If you

- choose not to register on the Sport Coaching Group Website, you will still be able to use our website for information but you may not be able to access all services.
- 4.2 Clients must provide emergency contact information to access our services.
- 4.3 Trainers, Contractors, Employees must provide information outlined in Sports Coaching Group Recruitment Policy

## 4. Access to your Information

- 4.1 You are entitled to review the personal information you have provided us and ensure that it is accurate and current at all times.
- 4.2 Clients will be able to access this via there unique login on the Website and will be able to edit their account at all times.
- 4.3 Trainers, Contractors, Employees will be able to access their personnel file in the main office in the locked draw of the Operations Manager. Any electronic information will be stored on password protected equipment.

# 5. Security of Information

- 5.1 Sports Coaching Group identified the following for the minimum requirements for safe use and storage of confidential information.
  - Use strong passwords, change them regularly and keep them secret. Ensure others are not watching you whilst entering passwords.
  - Log out of shared devices or lock your computer screen.
  - Do not leave personal data unattended or on display either in school or at home.
     Dispose of it correctly check the Recycle Bin on electronic devices or the Deleted Items folder in your emails. Cross shred or place paper based information in one of the confidential waste bins.
  - Be careful about the paperwork you carry with you each day and transport it securely. Report any loss or theft to the Data Protection Officer immediately.
  - Use only the Remote Access portal when working offsite. Do not email confidential
    information to personal email accounts, store it on your own phone/electronic device
    or carry it around on memory sticks.
  - When sending personal data by post, consider whether to protectively mark this as 'Confidential' or send by 'Signed For' or 'Recorded Delivery' options. Ask for confirmation of receipt.
  - Do not purchase/install software or sign students up to Information Society Services without prior approval of the Data Protection Officer.
  - Staff who use their personal equipment to take or record images of students must ensure that it is PIN/password protected. Any images taken <u>MUST</u> be uploaded to the school network at the earliest opportunity, then deleted from the device in question. Care must be taken to ensure that parental consent has been given and not recently withdrawn and that visitors to the School do not take or publish images of students without obtaining consent.
  - If you are concerned that there has been a data breach you MUST notify all data breaches to the Data Protection Officer without delay.

## **Emails**

- Do not use personal email accounts to conduct or support official School business.
- Be careful that your emails go to the person they are intended for and only copy emails to people that really need to see them.
- Do not send emails or attachments containing personal data outside the school network. Use the School's secure email solution (Egress) or ask a member of the admin team to do this for you.
- Delete emails that you no longer need check the Deleted Items folder.

## 6. Retention of Information

- 6.1 We retain information as long as it is necessary to provide the services requested by you and others, subject to any legal obligations to further retain such information. Information associated with your account or employment will generally be kept until it is no longer necessary to provide the services, your employment comes to an end or until you ask us to delete the account (whichever comes first)
- 6.2 We may retain information from deleted accounts to comply with law, prevent fraud, resolve disputes, troubleshoot problems, assist with investigations, enforce the Terms of Use and take other actions permitted by law. Some data may be stored for sales statistical purposes, and to support past employees with references.

## 7. How to OPT-OUT

7.1 We provide our Trainers, Employees, Subcontractors, Clients and Partners the opportunity to OPT-OUT. Should you wish to OPT-OUT please contact the Office Administrator (office@sportscoachingnw.co.uk) or call 01270 449770

# 8. Enforcement of this Policy

8.1 If for some reason it is believed that Sport Coaching Group has not adhered to this policy, please notify us and we will do our best to promptly make corrections.

## 8. Review

8.1 This policy will be reviewed on an annual basis unless an earlier need to review is identified