



## **Ealing BMX Data Protection Policy**

### **Introduction**

#### **About Us**

Ealing BMX is a not-for-profit community organisation, providing sports activities for children and young people. We are based at the Ealing BMX track next to Gurnell Leisure Centre, Ruislip Road East, Ealing W13 0AL.

Ealing BMX is not required to register with the ICO. However we abide by the principles of the GDPR in processing, managing and storing data.

#### **Data Controller**

Ealing BMX has appointed Gail Norman as Data Manager, with responsibility for managing data protection policy for the Club.

#### **Scope of policy**

The policy applies to all aspects of Ealing BMX's activities. Ealing BMX has not appointed any Data Processors to act on their behalf.

#### **Policy Details**

This policy was written on 3<sup>rd</sup> April 2021. It will be reviewed at least every three years.

The policy has been approved by the Ealing BMX Committee.

#### **Purpose of the Policy**

The purpose of this policy is to ensure that Ealing BMX:

- complies with the law regarding data protection.
- follows good practice.
- protects our coaches, riders, parents/ carers, volunteers, committee members and all other associated individuals.
- protects the organisation.

#### **Types of data processed**

Ealing BMX processes data relevant to its activities providing organised sporting activities to children and young people, its recruitment of coaches and volunteers, applications for funding and to running the organisation through a committee of volunteers.

We do not share data with third parties outside the stated purposes in this policy.

#### **Data processed includes:**

- Names, addresses and contact details for riders and their parents/ carers.
- Names, addresses and contact details for coaches, volunteers and the committee members.
- Details of training, qualifications, references and DBS checks for coaches and volunteers.

Some of the data is classed as sensitive- this includes:

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- Medical information on riders where this is needed to ensure their safety.
- Information on ethnic origin and religious belief of riders where this is required to allow for monitoring to ensure equality of opportunity.

### **Policy Statement**

Ealing BMX understands our obligations to comply with both the law and good practice regarding the handling and processing of data. We act all times to respect individual's rights regarding their personal data and to act in an open and honest way with individuals whose data is held and to ensure they are aware of what data is held and their rights.

Ealing BMX has a lawful basis for collecting, handling and processing data to enable the organisation to provide sporting activities for children and young people, to ensure their safety and suitability for taking part. The organisation also has a lawful basis for collecting, handling and processing data to enable the organisation to recruit suitable individuals and ensure they meet required standards and have been checked as required, and also for the organisation to apply for funding and to assess and report on the reach and effectiveness of its work.

Data is collected with the consent of data subjects. Consent can be withdrawn, however data subjects need to be aware that there may be occasions where in order to comply with legal, statutory or safeguarding duties, the organisation has to retain data for a certain length of time, even though consent for using it has been withdrawn.

We provide training and support for staff, volunteers and committee members who handle personal data, so they can act confidently and consistently.

We will notify the Information Commissioner of any data breaches, even if this is not required.

### **Key Risks and Security Measures Taken to Mitigate These**

The main risks are as follows:

- **Data being disclosed or accessed inappropriately.**

This is mitigated by ensuring that data can only be accessed by those who require it. All data which is stored electronically is password protected and securely backed up.

Where data is stored on portable media this will be protected by secure passwords.

Hard copy data is stored securely when not in use. When in use we ensure only those who are authorised to access the data are able to do so.

The systems we use to store data are regularly reviewed to ensure they are secure and data is only stored when absolutely necessary.

All individuals who handle data have received appropriate training and are aware of the requirement for confidentiality.

- **Individuals being harmed through data being inaccurate or insufficient.**

It is important that we have up to date and accurate contact details for all riders and parents/ carers, in case of any emergency situation where they need to be contacted. It is also important that we maintain accurate and up to date details of coaches and volunteers contact details, qualifications and safeguarding checks.

Contact details for riders and parents/ carers are reviewed on a regular basis when we collect payment for sessions.

Details of coaches and volunteers contact details qualifications and safeguarding checks are reviewed on a regular basis to ensure they are up to date and accurate.

## **Responsibilities**

### **Ealing BMX Committee**

The Ealing BMX Committee has overall responsibility for approving this policy and ensuring the organisation complies with its responsibilities regarding data handling and processing.

### **Data Manager**

The Data Manager has responsibility for

- Briefing the Committee on Data Protection responsibilities.
- Reviewing Data Protection and related policies.
- Ensuring that those who are responsible for handling data understand their responsibilities and have undertaken training where required.
- Notification to the ICO.
- Handling subject access requests.
- Approving unusual or controversial disclosures of personal data.
- Approving contracts with Data Processors.

### **Coaches, employees/ consultants and volunteers**

Are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

## **Data recording and storage**

Contact details are collected through the use of electronically completed forms, to ensure readability and accuracy. Contact details are regularly checked to ensure accuracy.

Data held is regularly reviewed to ensure information which is no longer relevant is not kept longer than necessary- for example details of riders who have left the Club. Data will be kept for a maximum of three years since last contact.

Data is stored in hard copy form in a secure place. Where data is stored electronically this is on a dedicated online drive which is password protected and can only be accessed by those who require this information to do their work.

## **Requesting your information**

You may request access to any information we hold on you by emailing [ealingbmx@gmail.com](mailto:ealingbmx@gmail.com) with the subject Requesting Data.

We reserve the right to charge a reasonable fee to provide data in some cases, to cover our costs in providing the information.

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