

## OSC data protection guidelines

Those of us who collect and handle data on behalf the club should follow these guidelines so that the club remains within the bounds of the General Data Protection Regulations. I've kept this deliberately concise. For further information, please take a look at the club's privacy policy (on the website) and the RYA's Recognition Guidance Notes, which include specific guidance on data protection for RYA Training Centres.

### Collecting data

You must collect data only under the six principles of data protection, summarised here:

- **Lawful, fair, transparent:** you must have a lawful reason to collect data (in most cases this will be 'legitimate interest'), use data only for what you said you would, and tell people what we are going to do with their data.
- **Purpose limitations:** use data only for the reason it was collected.
- **Data minimisation:** only collect the data you actually need.
- **Accuracy:** data must be accurate and up to date.
- **Storage limitations:** delete data when you no longer need it.
- **Integrity and confidentiality:** keep data securely and don't share it.

Note that GDPR applies to data collected on paper as well as digitally.

### Privacy statement & policy

All forms that people fill in should include a statement about data and privacy, as below. This is already included in our online membership and registration forms, but you may need to update paper forms.

*Otley Sailing Club takes your privacy seriously. We process the personal information you have given us here according to current UK data protection legislation, as outlined in our club privacy policy, a copy of which can be found on the club's website. We will use your information only for the purposes of running the club, operating training course or events, and, if you opt in to receive emails, keeping you informed about club events. We will not share your information with any other organisation without your knowledge.*

### What data we collect

Here's a summary of what data OSC collects, and who is responsible for handling it. A more comprehensive list is included in the privacy policy. Shout if there's anything else!

- Personal details and contact details of club membership (membership secretary)
- Personal details, contact details and medical details of course participants (RYA principle, senior instructors)
- Personal details and contact details of event registrants (event organiser)
- Parent / guardian details for course participants U-18 (RYA principle, senior instructors)
- Personal details for DBS for volunteers and instructors (child protection officer)
- Personal details, contact details, and qualification records of instructors (sailing principle)
- Personal details and contact details for powerboat course attendees, which are then shared with the RYA (senior powerboat instructor)

We collect almost all this information under 'legitimate interest', as we can't operate membership, courses, etc. without data. There are two exceptions:

- medical information, for which we must get consent. So anywhere that we ask for medical information we need wording such as:

*Please enter any relevant medical conditions of which we need to be aware. By providing this information you consent to it being stored and used if necessary.*

- email addresses used send out 'marketing emails' about club events and courses. Members and club contacts will need to consent by positively opting in to get these mails in future.

### **Recording data**

You need to keep a record of what data you've collected. The website takes care of itself, and a paper form will be a record in itself, but must include a date.

### **Destroying data**

We must only keep data for as long as it's needed, and destroy / delete it as soon as possible after that. For example, for membership, we will aim to delete records of ex-members within a year of them leaving them club. In the RYA's Recognition Guidance Notes there are guidelines on keeping the data for RYA purposes (it's a year at least for course participants).

Paper records should be shredded, and digital records deleted as securely as is possible.

When you destroy data, please keep a record of what it was, when it was

collected, and when it was destroyed.

### **Data purge**

If you currently have any data that you don't need, either on paper or on computers, memory cards, etc., please destroy it as soon as possible, so that we start with a clean slate, as it were. We have already done this for membership records and old club contacts.

If you have data that you still need, please record what you have, and when you collected it (if possible).

### **Photographs and videos**

Under some circumstances photographs and videos count as personal data under GDPR, and in a few circumstances as sensitive personal data.

Forms should contain an opt-in box for people to agree to photos and videos of them being used on the club website and social media accounts (which I think should include the members' Facebook page). Online membership and event registration forms now include this opt-in box.

Some people may not opt in, and we need to be aware of this when taking photos and videos at the club and at club events. This is something bit of a grey area, and worth investigating further, but generally:

- Photos and videos taken from a distance, such as people sailing out on the lake, are not a problem, as long as people can't be identified easily.
- Ask people (parents or guardians for children) if they have given written consent before taking photographs of them from which they can be identified. Don't rely on verbal consent.
- Avoid naming anyone in a photograph or video without making sure they have given consent.
- Make other members aware of these guidelines.
- Err on the side of caution.

Note that the guidelines above on keeping data secure and destroying / deleting data apply equally to photographs and videos. So if you have a load of old photos of people at the club that you no longer need for legitimate purposes, please get rid of them.

### **Any questions?**

Hopefully these guidelines won't raise more questions than they solve. I'm far

from being an expert on GDPR, and these guidelines are based on what I've gleaned over the past few months. No doubt there will be tweaks and adjustments required to this document and to our privacy policy. Let me know if you think there's anything unclear or anything that we need to change.

Chris Oxlade  
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