



Data Protection Policy

Version	Published	Comments	Author
2.0	May 2018	Policy re-written. Added details on new DPA 2018, including new information rights. Added details on definitions, complaints, children data and links to external sources.	N Smith

Introduction

The Data Protection Act 2018 (DPA) places a number of obligations on organisations who process personal data. In particular, it regulates how an individual's personal information is used and protects people from misuse of their personal details.

As part of its business, the ETA may process personal information on its staff and members, including players, referees and officials. The purpose of this policy is to set out how the ETA will use comply with its obligations under the DPA and the rights available to individuals in relation to their data which the ETA holds.

Definitions

- **Data Subject**

This is any living individual.

- **Personal data**

'Personal data' means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

This definition applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data held by the ETA.

- **Sensitive personal data**

The DPA refers to sensitive personal data as "special categories of personal data." The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual.



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The ETA is unlikely to process 'special category' data, but if there is a requirement to do so, it will ensure that adequate safeguards are in place and that where necessary, data subjects are informed.

As part of its application process and safeguarding obligations, the ETA may be required to process some data relating to criminal convictions and offences. The rules for sensitive (special category) data do not apply to information about criminal allegations, proceedings or convictions. Instead, there are separate safeguards for personal data relating to criminal convictions and offences. Where this information is collected and processed, the ETA will take all necessary measures to advise data subjects and ensure appropriate safeguards are in place.

Policy Objectives

Registration with the Information Commissioner's Office (ICO)

Each organisation processing personal data must, subject to certain exemptions, register with the Information Commissioner each year. The England Touch Association (ETA) is a not for profit organisation that processes personal data only in order to meet our operational needs or fulfil legal requirements, therefore qualifies for such exemption.

Data Protection Principles

The ETA is fully committed to ensuring that we comply with the six data protection principles, as listed below:

1. processed lawfully, fairly and in a transparent manner in relation to individuals
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
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 rectified without delay
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;
6. 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.

For more details on what this means for you and your personal data, please contact the Governance Director at governance@englandtouch.org.uk

How will England Touch use personal data?

This section of the policy is to set out how the ETA collects and uses personal data.



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Purposes

The ETA hold the details provided on registration forms with other information it holds or obtains from or about individuals and will use this for the following purposes:

- for maintaining records (such as staff records, membership records, etc)
- to respond to any enquiries individuals make (including subject access requests)
- to administer any ETA events in which individuals participate or may wish to participate
- to administer any incidents involving its members
- to administer any disciplinary or misconduct involving its members
- to create an individual profile for members to use our website
- to create anonymised aggregated information about members and players to enable us to secure funding
- to contact individuals, subject to express consent about ETA events, offers and opportunities available from the ETA or selected commercial partners

Recording images

The ETA may record official training and competition events in which individuals participate and general images of players will form part of the information we hold and use. In addition to the purposes for general information set out above, the ETA may use these recordings and images for the purposes of education and training, player analysis, promotion, performance, development and selection and event analysis.

Where recorded images and videos are used, the ETA will endeavour to obtain consent from individuals or their representative beforehand.

Publication on websites

Details of your achievements in events, including your image, may be included on the England Touch website and these will be available to the general public.

The ETA will seek to obtain before your image is used as far as practicable. If you do not want your details to be visible in this way, you can contact the Governance Director by email: governance@englandtouch.org.uk with your request to remove your details.

Who will England Touch disclose personal data to?

The ETA will not disclose any personal information about an individual, unless we have explicit consent to do so, or are required to do so by law. Where consent to disclose information is given, this can be withdrawn at any time, subject to applicable legislative requirements.



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Direct marketing

The ETA work with a number of sponsors and commercial partners (details of these can be found at www.Englandtouch.org.uk) to promote touch, raise funding for the sport and to secure opportunities for members.

In order to further this objective, the ETA may offer individuals the opportunity to be contacted by our partners with information about the offers and services available. The ETA (and our partners) will seek express consent from individuals beforehand and this can be withdrawn at any time.

Individual details and other personal information will not be shared without consent or for any other purposes.

If individuals have any concerns over their personal information, they can contact the ETA Governance Director.

Will the ETA share personal data use outside of the EEA?

The ETA will not, as a matter of course, disclose any personal data outside of the EEA. However, where individuals, participate in an ETA event that takes place outside the EEA, certain information may be disclosed to the relevant event organiser(s) in the host nation. This information will only relate to an individual's participation in the event and where such disclosures take place, the ETA will inform data subjects and ensure all appropriate measures are in place to protect the information.

Data Subject Rights

Under the DPA 2018, individuals have a number of rights in relation to the personal information which the ETA holds about them. The ETA takes these rights very seriously and will ensure that all requests by individuals are exercised accordingly.

In particular, individuals have the right to request:

- confirmation that their data is being processed by the ETA
- access to their personal data and
- other supplementary information.

This is known as 'subject access.' This information will be provided to individuals **free of charge and within 1 month** from date of receipt. If individuals wish to exercise the right of access they should request this in writing to the Governance Director at governance@englandtouch.org.uk.

Other rights in relation to the personal information which the ETA processes about individuals includes (but is not limited to):

1. The right to rectification
2. The right to erasure
3. The right to restrict processing



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4. The right to object

Individuals may find useful information about these rights on the ICO website at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

To exercise any of these rights, or to find out more information, please contact the ETA Governance Director at governance@englandtouch.org.uk

Children

The ETA takes its responsibilities in relation to children and young people very seriously. Where it is necessary for the ETA to collect and process data relating to children under 18 years, it will seek consent of the Child's parent or guardian. The ETA will also take positive steps to ensure that the information is kept secure and that it is not disclosed or shared with any third parties unless there is a legal basis for doing so.

How can individuals complain about how their personal data is used by the ETA?

If an individual is unhappy with how their personal data has been used by ETA, they may make a complaint by writing to the Governance Director at governance@englandtouch.org.uk

The complaint will be fully investigated in line with the ETA Complaints Policy.

If the complaint is not resolved to a satisfactory conclusion, the individual may make a complaint to the ICO. Further details can be found at: <https://ico.org.uk/for-the-public/>

Where can individuals find more information?

Individuals can contact the ETA Governance Manager with any questions, complaints or concerns at governance@englandtouch.org.uk

Other useful information is available from:

- ETA website: englandtouch.org.uk
- Information Commissioner's Office website: <https://ico.org.uk/>