



Data Protection Policy

In line with England Roller Hockey's Data Protection Policy

Herne Bay Roller Hockey & Skating Club (HBRH&SC); is committed to complying with data protection law and to respecting the privacy rights of individuals. The policy applies to all of our staff, workers, directors, volunteers, and consultants.

This Data Protection Policy sets out our approach to data protection law and the principles that we will apply to our processing of personal data. The aim of this Policy is to ensure that we process personal data in accordance with the law and with the utmost care and respect.

The Principles of the General Data Protection Regulations (Under Article 5):

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; 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.
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; 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 UK GDPR & DPA 2018 in order to safeguard the rights and freedoms of individuals; and
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.

HBRH&SC full Data Protection Policy can be found below.

Processing of Data/Privacy Notices

We are committed to respecting your privacy. Our privacy notice explains how we may use personal information we collect before, during and after your membership with us. The notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

The notice applies to you if you are either:

1. an individual player/participant of HBRH&SC Hockey who has registered his/her interest in participating in the sport competitively and/or whose details we have collected.
2. a coach or any other club official who has registered for membership. Where required by law we will seek your consent to changes in the way we use your personal information.



Data Security

All staff members and officers are responsible for ensuring that any personal data that they possess regarding any other individual is kept securely and is not disclosed to any unauthorised third party unless prior permission from the data subject has been sought after or it is highlighted and adopted in England Rink Hockey's privacy notice.

Data/Policy Breach

Any breach of this policy will be treated seriously and may also constitute a breach of the General Data Protection Regulations (May 2018). Any suspected breach of this policy or data breach will be dealt with by England Rink Hockey's Data Protection Officer, Compliance Manager, or a nominated lead investigator.

England Rink Hockey may take action against any member who has breached England Rink Hockey's Data Protection policy in accordance with England Rink Hockey's Disciplinary Procedures.

Procedures:

If a suspected data breach is found, England Rink Hockey's Data Breach policy will be followed:

1. Incident received/reported
 2. The Data Protection Officer (DPO) or appointed lead investigator will firstly determine if the breach is still occurring. If so, the appropriate steps will be taken immediately to minimise the effect of the breach.
 3. An investigation will be undertaken by the DPO or appointed lead investigator immediately and wherever possible within 24 hours of the breach being discovered/reported.
 4. The investigation will need to take into account the following:
 - The type of data involved and its sensitivity
 - Any protections that currently in place
 - What's happened to the data (has it been lost or stolen)
 - Could the data be put to any illegal or inappropriate use
 - Who the individuals are, number of individuals, potential effects on those data subjects
 - Are there any wider consequences to the breach
 5. The DPO or appointed lead investigator will determine who needs to be notified of the breach.
 - Any legal/contractual requirements?
 - Whether notification would assist the individual affected – could they act on the information to mitigate risks?
 - Whether notification would help prevent the unauthorised or unlawful use of personal data?
 - Would notification help England Rink Hockey meet its obligations under the seventh data protection principle.
 - If a large number of people are affected, or there are very serious consequences, whether the Information Commissioner's Office (ICO) should be notified. Not every incident warrant notification and over notification may cause disproportionate enquiries and work.
- Notification to the individuals whose personal data has been affected by the incident will include a description of how and when the breach occurred, and the data involved. Specific and clear advice will be given on what they can do to protect themselves and include what action has already been taken to mitigate the risks. Individuals will also be provided with a way in which they can contact England Rink Hockey for further information or to ask questions on what has occurred.*



6. Once the initial incident is contained, the DPO or appointed lead

investigator will carry out a full review of the causes of the breach; the effectiveness of the response(s) and whether any changes to systems, policies and procedures should be undertaken.

Above is a brief overview of England Rink Hockey's data breach policy. England Rink Hockey has an internal data breach policy which will be followed where any breach is found.

To reduce the risk of any data breach occurring, England Rink Hockey has taken the following steps to reduce any risk:

- England Rink Hockey will ensure that its name and address will be on all paperwork as appropriate and will identify the use to which any information requested will be put.
- Data held will be used responsibly and within the limits described in the regulations.
- The type of data collected will be reviewed at least annually.
- Any error will be rectified as soon as possible after HBRH&SC becomes aware of it.
- Financial records are kept for seven years or as long as is dictated by the law.
- All computer-held personal or financial data is held on password protected computers with only the authorised users holding passwords
- Any data held in paper form will be kept safely by the Club Secretary and only accessed by authorised personnel.
- Any paper records are destroyed when they are no longer required.

Individual's Rights

Individuals that HBRH&SC holds information have the right to:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

More information with regards to each individual right can be found on the ICO website - [ICO Individual Rights](#)

Contact the club Secretary and we will remove your club contact details from our systems.

Responsibilities of Staff and Management

The staff and officers of England Rink Hockey are responsible for the processing of data in accordance with the regulations and for upholding the principles outlined in this policy for the processing and maintenance of data regarding its members.

All personnel are expected to observe data protection good practice at all times and to ensure that the personal data they make available for processing is kept accurate, up to date and secure.

Transferring of Data

HBRH&SC currently doesn't hold or transfer data outside of the European Economic Area (EEA).