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Lancashire Aikikai Data Handling Policy

February 2011



Data Protection Act 1998

The DPA 98 details 8 principles for the handling and management of data. It is a requirement of the BAB that all Clubs and Associations should comply.

All data should be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the rights of the data subject
- Secure
- Not transferred outside the European Economic Area without adequate protection.

“Types” of Data collected

- Personal – Type 1
 - Name & address
 - Contact and emergency contact details
 - Date of birth
 - Employment status
 - Insurance
- Medical – Type 2
 - Injuries / conditions
- Welfare – Type 3
 - Permission to hold a role / Child Protection / CRB forms
 - Accidents / incidents
- Coaching – Type 4
 - Grading details, attendance records, first aid, BAB Qualifications

Sources of Data

- Membership forms
- Visitor records
- Annual renewals – update forms
- Attendance records
- Accident reports
- Grading and coaching records
- Membership books
- Permission form to hold role; CRB Forms
- BAB Records

Data Holders and Handlers (Aikikai)

Association officials

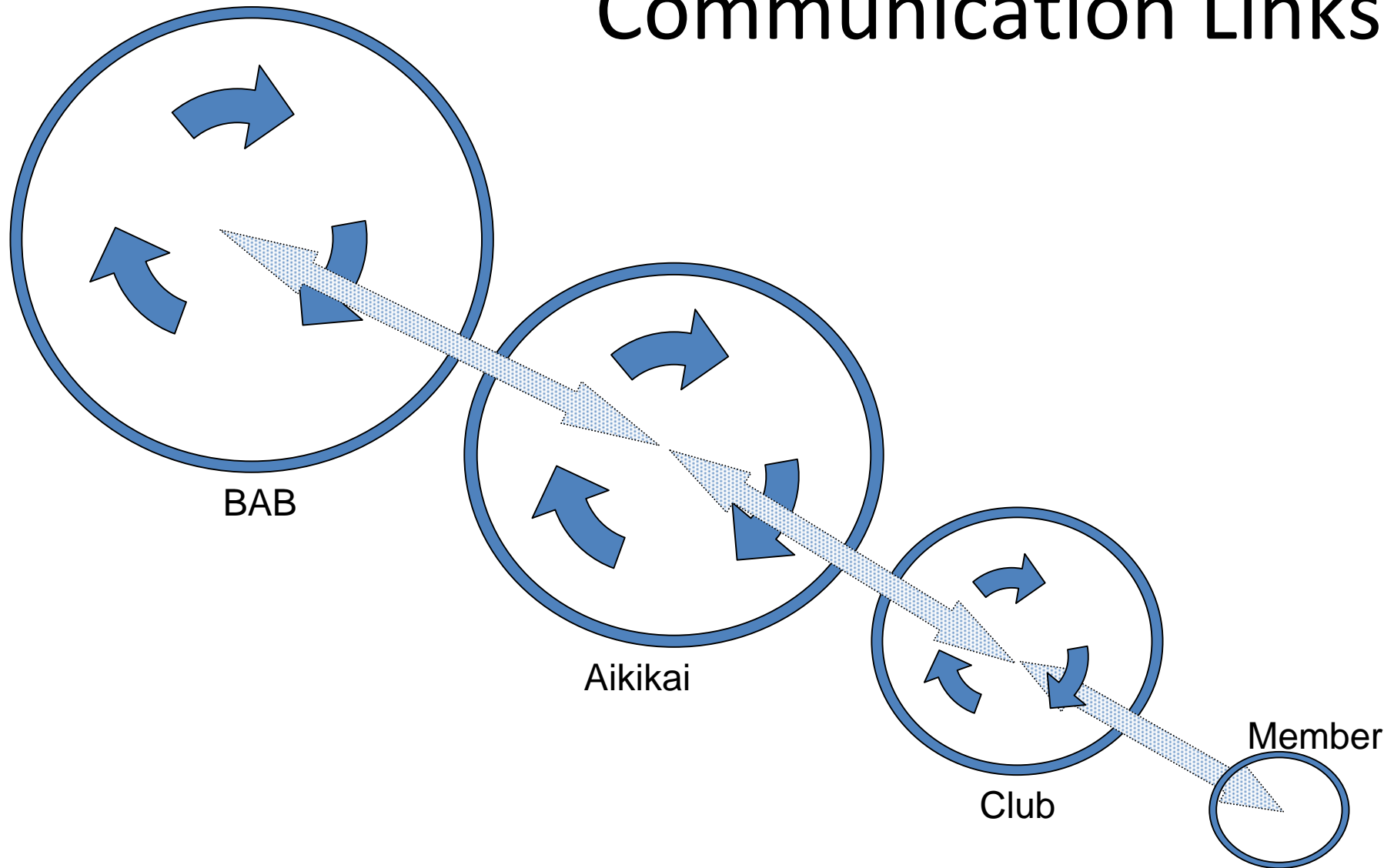
- Principal
- Treasurer, Insurance and Membership
- Secretary / Web administrator
- Publicity Officer
- Coaching Liaison Officer
- Child Protection Officer

Data Holders and Handlers (club level)

Club Officers

- Club Leader
- Treasurer
- Secretary
- Welfare Officer
- Coaches
- Publicity Officer
- Other roles – eg Induction , Website manager, etc

Communication Links



Association Level Data Handling Matrix

Association Officer title	Type 1 – Personal	Type 2 – Medical	Type 3 – Welfare	Type 4 – Coaching
Principal	✓	✓	✓	✓
Treasurer / Insurance	✓	✓	✓	
Secretary / Web admin	✓			✓
BAB Rep				
Coaching Liaison	✓			✓
Child Protection	✓		✓	
Publicity Officer	✓			✓

The Club or the Aikikai will always obtain a Member's permission to use their personal data, other than just their name when publishing information regarding that Member's grading, role or coaching qualification.

Club Level Data Handling Matrix

Club Officer title	Type 1 – Personal	Type 2 – Medical	Type 3 – Welfare	Type 4 – Coaching
Leader	✓	✓	✓	✓
Treasurer / Membership	✓	✓		✓
Secretary	✓			✓
Coaches	✓	✓	✓	✓
Child Welfare	✓		✓	
Inductor	✓	✓		
Publicity Officer*	✓			✓

*Publicity Officer - contact details only

The Club or the Aikikai will always obtain a Member's permission to use their personal data, other than just their name when publishing information regarding that Member's grading, role or coaching qualification.

Data Handling / Risks

Mode of Communication	Risks associated with mode
Verbal <ul style="list-style-type: none">• Face to face• Telephone	<ul style="list-style-type: none">• Mis-hearing• Forgetting• Being overheard
Hard copy <ul style="list-style-type: none">• By hand• Post• Other 3rd party	<ul style="list-style-type: none">• Relatively risk free but inconvenient• Slightly higher risk of being lost and falling into wrong hands
Electronic <ul style="list-style-type: none">• Email• Storage device	Convenient but <ul style="list-style-type: none">• Is email link safe? Correct address?• Security of sending and receiving equipment• How to deliver the storage device (see Hard Copy above)

Risk Assessment

- Step 1 – Who needs to know?
 - What position do they hold in the Assoc / Club?
 - What data are they entitled to see (refer to matrix)?
- Step 2 – What data do they need?
 - Is there additional data on the record that is surplus to their needs? Can required data be copied and provided separately?
- Step 3 – What is the appropriate mode of communication having regard to....?
 - Convenience, urgency
 - Security – have regard to the “sensitivity” of the data (refer to “Type”)

Data Holding

Four lifecycle stages:

1. Inception / collection – data is assumed to be accurate – is it collected in a secure environment?
2. Update and maintenance – annual revision minimum standard;
3. Archive – 12 months after membership ceases, the data must be archived;
4. Deletion following completion of archive period – Paper copies shredded, electronic data deleted..... but there are exceptions.....

Archive for *how long?*

Type of Data	Archive period
Membership and visitor records	3 years
BAB Insurance details	Archived 1 year after insurance expires and held for further 3 years, however “best practice” is 6 years to allow for litigation period to pass.
Accidents for Adults	6 years - to allow for litigation period to pass.
Permission to hold a role and associated information used in the process (But not data from crb application itself)	4 years (ie 12 months after expiry of permission)
Child Protection Incidents and Accidents involving Children	All data must be kept until the youngest person involved has reached the age of 24 (ie 18 yrs + 6 yrs)
Gradings and coaching records	Indefinitely
Attendance record	6 years
Email address list	Until notified by addressee to be removed or until email address ceases to be valid
Newsletters / press releases / general Aikikai and club information	Indefinitely. However, access to archive for existing and past members only and to be password protected

Data Holding

- How is it stored?
 - Hard copy (Induction Form, Attendance Register, Accident Book, CRB Forms, etc)
 - Electronic (PCs, laptops, servers, disks, portable storage devices)
- How is it secured?
 - Locked filing cabinets
 - Passwords – On the PC / laptop and on the encrypted document. Who knows these? How frequently changed? How are changes communicated?

Consents

- Individual deemed to grant consent to holding of their details and passing of their details as a member of the Aikikai in accordance with Aikikai data handling policy
- However, data holder must have consent of the individual to hold or pass on their details if proposed action is outside the relevant matrices

Electronic Communication

- The Aikikai and Clubs' Websites email contact details must be anonymous (eg **@lancashireaikikai.org or club domain name);
- All distribution list emails by Aikikai or Clubs must offer recipient opportunity to have their email address removed from the email list and for this to be done when requested.