
Cerebral Palsy Sport

No: CPS047

Data Protection Policy and GDPR

Version 5

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Purpose:

Cerebral Palsy Sport believes that sound policies in the following areas will significantly benefit the overall efficiency of the organisation with a focus on supporting the organisation in all aspects of the effective management of data.

1. Statement of Policy

- a. This policy defines the principles and methods employed by Cerebral Palsy Sport to ensure the effective and safe management of data and personal information.

2. Scope of Policy

- a. Cerebral Palsy Sport needs to keep certain information about its employees, service users, volunteers and other users to allow it to monitor performance, achievements, and health and safety etc.
- b. It is also necessary to process information so that the organisation can comply with its legal obligations and staff can be recruited and paid and courses and events organised. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, Cerebral Palsy Sport must comply with the Data Protection Principles which are set out in the Data Protection Act 1988 and the General Data Protection Regulation (Regulation (EU) 2016/679).
- c. Cerebral Palsy Sport has been registered with the Information Commissioner's Office since 24th September 2009 and this registration is reviewed annually. The Registration reference number is: **Z1929253**

3. Policy

- a. Cerebral Palsy Sport will apply procedures to ensure that:
 - i. Personal data obtained is processed fairly and lawfully and shall not be processed unless certain conditions are met.
 - ii. Data will be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
 - iii. Be adequate, relevant and not excessive for that purpose.

- iv. Be accurate and kept up to date.
- v. Information is not kept for longer than is necessary for that purpose.
- vi. Information is kept safe from unauthorised access, accidental loss or destruction.
- vii. All Cerebral Palsy Sport team members and others who process or use personal information must ensure that these principles are followed at all times.
- viii. The Board of Directors is ultimately responsible for the implementation of this policy.

4. Code of Practice

- a. Personal data is collected and collated in a responsible and accountable fashion.
- b. Personal data is to be processed only when there is a clear purpose for doing so in compliance with the General Data Protection Regulations.
- c. Staff are responsible for ensuring that any personal data that they hold is kept securely in accordance with the organisation's data storage policies.
- d. Personal Information is not disclosed either orally or in writing or via web pages or by any other means, accidentally or otherwise, to any unauthorised third party.
- e. Personal information will be kept in a locked filing cabinet, drawer or safe or if it is computerised, it is password protected. Any copies of the data (disc, cd,) are kept in a locked filing cabinet, drawer, or safe.
- f. All team members and users are entitled to know what information the organisation holds on them and why we have access to the information and are informed about what the organisation is doing to comply with its legal obligations.
- g. Cerebral Palsy Sport will only process personal information with the clear and recorded consent of the individual.
- h. Cerebral Palsy Sport has a duty under the Children Act 2006 to carry out appropriate Police Record checks and disclosure of personal information will be handled correctly and stored securely. Criminal Record information will only be disclosed to certain other people as defined within the Police Act 1997.
- i. Cerebral Palsy Sport, in the course of its support and care of athletes, may ask for information about particular health needs and particular forms of medication. C P Sport will only use this information in the protection of the individual and will need consent to process this data in the event of a medical emergency.
- j. The names of Board of Directors is published in the Annual Report and on the Charity Commission and Company's House website as statute and law requires such data to be made public.
- k. Certain items of information relating to team members will be made available on the public website in order to meet the legitimate needs of visitors and enquirers seeking to make contact with appropriate team members.

- l. Ordinarily, personal data should never be stored at staff members' homes, whether in manual or electronic form, on laptop computers or other personal portable devices or at other remote sites.
- m. Personal data in manual form, such as paper, files, correspondence or database printouts, will not be left in full view and will be locked away.
- n. Staff members working with personal data will be made aware by their line manager of the purpose for which the data is processed. Personal information must not be disclosed either orally or in writing or via web pages or by any other means, manual or electronic, accidentally or otherwise, to any unauthorised third party.
- o. Occasionally, some categories of data are routinely or from time to time released through one or more forms of publication.
- p. Cerebral Palsy Sport has a duty to retain some staff data for a period of time following their departure from the organisation, mainly for legal reasons, but also for other purposes such as being able to provide references, or for financial reasons, for example relating to pensions and taxation. Different categories of data will be retained for different periods of time.

5. Data Record Disposal

- a. When a record containing personal data is to be disposed of, the following procedures will be followed:
 - i. All paper documentation containing personal data will be permanently destroyed by shredding.
 - ii. All computer equipment or media that are to be sold or scrapped will have had all personal data completely destroyed, by reformatting overwriting.

Type of Record	Minimum Retention period	Reason for Length of Period
Personnel files including training records, notes of disciplinary and grievance hearings and appraisal forms	6 years from the end of employment	References and potential litigation
Letters of reference	6 years from the end of employment	References and potential litigation
Application forms/interview notes	At least 6 months from the date of the interviews	Time limits on litigation
Income Tax and NI returns, including correspondence with the Tax Office	At least 3 years after the end of the financial year to which the records relate	Income Tax (Employment) Regulations 1993

Statutory Maternity Pay records and calculations	As above	Statutory Maternity Pay Regulations 1986
Statutory Sick Pay records and calculations	As above	Statutory Sick Pay Regulations 1982
Wages and salary records	6 years	Taxes Management Act 1970
Accident books, and records and reports of accidents	3 years after the date of the last entry	Social Security (Claims and Payments) Regulations 1979, RIDDOR 1985
Health Records	During employment	Management of Health and Safety at Work Regulations
Health Records where reason for termination of employment is connected with health, including stress related illness	3 years	Limitation period for personal injury claims
Classification Data	In perpetuity	Classification assessment does not change during the lifetime of an athlete
Police Record Checks	Disclosure and record of disclosure shall be kept for no longer than is required for the purpose. No later than six months after the date on which recruitment or other relevant decision have been taken.	
Volunteer references and data	For as long as the volunteer is involved with the organisation.	
Athletes' records of achievement	In perpetuity	Retained for the organisation's archive

Document Control:

Policy Details			
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Review Due	27.09.18		
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