

# Totnes Sub Aqua Club GDPR Policy

## 1. General

General Data Protection Regulations came into force on 25<sup>th</sup> May 2018. The following details the measures TSAC take to ensure compliance.

## 2. Data Protection Officer

The Membership Secretary is the clubs Data Protection Officer (DPO)

## 3. Data held, Use and Measures Taken

Totnes Sub Aqua Club hold nine types of information that could contain personal data

Record Type	Maintained Note 1	Master record	Available to Note 2	Use	Retention Period
Contact details	Membership Secretary	Paper & Dropbox spreadsheet	All current members Note 3	Communicate and arrange club activities	Year after member leaves Note 4
Payments from & too members	Treasurer	Club Accounts	Treasurer, Membership Secretary	Maintain financial records	Indefinitely
Bank Account Details	Treasurer	Club Bank Accounts	Members with access to club bank accounts	Make payments to members	Remove when member leaves
Ongoing training records	Training Officer	Paper	Instructors	Track training	Until registered with BSAC or year after member leaves (Keep stats) Note 5
Qualification / Authorisation	Membership Secretary	Dropbox Spreadsheet	Diving & Training Officers	Check members only do what they are qualified for	Year after member leaves
Dive records	Diving Officer	Paper	Training Officer & Treasurer	Verify experience, compliance & fees/costs	Year after year end. (keep stats)
Gas fill	Diving Officer	Paper	Compressor operators & Treasure	Verify compliance and payments	Year after year end. (keep stats)
Medical records	Membership Secretary	Paper or BSAC	Diving Officer & Training Officer Note 6	Ensure divers are fit & restrictions implemented	Year after obsolete or member leaves
Meeting minutes	Secretary	PDF	All current members	Record club business	Indefinitely
Incident Reports	Diving Officer	Paper	All current members	Record issues, actions and lessons	Year after submitted to BSAC

The TSAC will only provide personal data to third parties to support the service that the club provides, i.e. the BSAC to provide training material, qualifications, magazine, insurance, etc. and our bank where payments are made for expenses incurred supporting the club.

The BSAC membership forms and records of qualifications are passed to the BSAC for their records. Incident reports will also be passed onto the BSAC and these may contain personal details. The BSAC keeps these records indefinitely unless asked to remove them.

**Note 1** The club officer responsible for maintaining a record is to ensure that:

- Master records are as accurate and up to date as is practical.

- Master records are secure and protected from unauthorised use.
- The risk of misuse is assessed
- People given access to information are aware of restrictions on its use.
- Review the measures being taken with the DPO at the beginning of each club year.

**Note 2** Electronic copies of master records shall be encrypted by the responsible club officer. Passwords are to be issued by a different medium from the one used to access the record and shall be restricted to key people. Where information is distributed in an un-editable format to a wider audience such as PDF of contact details it does not need to be encrypted provided checks are in place to ensure that it has gone to the right people. This will include In Case of Emergency (ICE) details, where provided.

**Note 3** For Junior members the contact information of the parent or guardian is provided and not the member. If a parent or guardian instructs a member or members of the club to contact the Junior member directly this instruction shall be retained by the Membership Secretary/DPO and copied to the Welfare Officer.

**Note 4** A member is deemed to have left when the Membership Secretary reports that they have left the club. This allows the Membership Secretary to apply discretion if they feel that the member is likely to renew

**Note 5** Statistics are generated from personal data but remove identification of individuals and are therefore not considered as personal data.

**Note 6** The Membership Secretary maintains a spreadsheet with details of medicals and provides the Diving Officer and the Training Officer with access.

## 4. Guidance to Members on Data Usage

All members will be informed of

1. The data that the club holds
2. The purpose of that data
3. The measures taken to prevent the data being used for other purposes
4. Their rights to have that data corrected, updated and deleted

All members will be asked to confirm their acceptance of how the club uses and protects data relating to them. See Attachment 3. Existing members will be emailed this statement asking them to respond by return of email. New members will be asked to indicate their acceptance or otherwise on the TSAC Membership Form when they join the club.

If a member objects to the club's GDPR Policy, the DPO will discuss possible alternative arrangements and their implications. A record of that discussion will be kept to demonstrate compliance to legal obligations and copied to the member.

If a member does not confirm their acceptance, data relating to them will be deleted, except where it is needed to demonstrate compliance to legal obligations. This will limit communication with the member and the services provided by the club.

## Attachment 2 Members Guidance on Protection of Personal Data

This contact list is provided to enable you to support TSAC activities and communicate with people organising events. Details should not be used to promote activities that the club is not supporting nor should details be shared with people that are not club members.

Particular attention should be taken when sending emails to a distribution of members and non/lapsed members. Keeping your distribution up to date will help prevent this. Sending the email to yourself and Blind Copying to everyone else, prevents people seeing other recipients' details.

Members are also expected to take reasonable precautions to protect this data such as having up to date virus protection and not providing others with access to your account.

Please report possible breaches to the club DPO i.e. your email account is hacked or you have a virus on your computer.

For Junior Members, parents or guardians contact details are provided not the Junior.

### Attachment 3 Members Acceptance of GDPR Policy

You have provided the following personal information to Totnes Sub Aqua Club to help it provide you with dives and develop your skills in a safe environment.

- Phone numbers, email address and home address which are shared with all members. For Junior members the parent or guardian's details are shared.
- Payments from and to you and your Bank Account and Sort Code. The latter is only applicable to members that have received payments/refunds from the club and will only be available to the club officers with access to the club bank accounts.
- Self-Assessment Medical or Medical Referee Assessment. Only the Membership Secretary, Diving Officer and Training Officer have access to this information.
- Qualifications, Training, dive records and cylinder fills will be available to the Diving Officer, Training Officer and Treasurer.

You may also be mentioned in meeting minutes, the weekly 'Shout!' and Incident Reports.

More details how different types of data will be used, distributed, stored and protected from misuse are provided in the attached Totnes Sub Aqua Club GDPR Policy.

You have a right to see the information that we hold, request errors are corrected and information deleted, however details may be retained where required to demonstrate TSAC's compliance with legal obligations.

In order to comply with GDPR regulations we need you to agree or disagree with the data that we hold on you and the way that we use it. If you do not respond or disagree it will limit the services that we can provide and the way that we provide them, but we will try and work with you to limit the impact that this will have.

Please return this email with one of the boxes checked.

Agree       Disagree