



## Data Protection Policy

October 2017

### Background

Every member of Hitchin Swimming Club is required to register and complete details on our website. The details you provide to us are used solely for the purposes of your club membership and will not be used for commercial or marketing purposes. Your details are securely held by the committee in both hardcopy and electronic form which places a responsibility upon the club committee in relation to the Data Protection Act 1998.

### Data Protection Act Principles

The Data Protection Act 1998 puts in place 8 principles to make sure that the information you provide to us is handled properly. These state that data must be:

Fairly and lawfully processed

Processed for limited purposes

Adequate, relevant and not excessive

Accurate

Not kept for longer than is necessary

Processed in line with your rights

Secure

Not transferred to countries without adequate protection

Club membership records are regularly reviewed by the committee to ensure compliance with these principles – refer to our Record Keeping Policy for details on the length of time that different records are kept.

### Medical Details

The safety of club members is of prime concern to us. Given the nature of swimming, it is essential that club staff/committee are aware of any health issues that could impact a member's safety, particularly when poolside. The registration process therefore requires each member to provide us with detail relating to any health issues that in your judgement you feel the club should be made aware of. In addition, we ask that you provide detail of any medication that might be required in relation to the health issue.

Any such medical information you provide to us is also held by us in both hardcopy and electronic form. Under the data protection act we require your explicit consent to hold such information and your agreement during the registration process is our means of discharging our responsibility.

The current act also states that parental consent is required for the collection of data for children aged below 12 years of age. The Amateur Swimming Association feel that 12 years of age is too low and have decided that it would be better to obtain parental consent for the collection of data for anyone below 18 years of age.

### Changes to membership details (including medical details)

Under the Data Protection Act we have an obligation to ensure the membership details that we hold are accurate - we can only do this if you keep your details up to date via our website.

### ASA and the Data Protection Act

In accordance with the Data Protection Act 1998, the ASA is registered with the Information Commissioner's Office on behalf of all affiliated clubs to hold personal data relating to your membership. This discharges the need for Hitchin Swimming Club to register independently. The data protection notice used by the ASA is provided below for reference:-

## Amateur Swimming Federation of Great Britain Ltd (ASFGB Ltd)

### Data Protection - Membership Data Collection and Consent

The Data Protection Act 1998 ("the Act") sets out certain requirements for the protection of your personal information (i.e. information about you) against unauthorised use or disclosure. The Act also gives you certain rights. References below to the Amateur Swimming Federation of Great Britain Ltd (ASFGB Ltd) include a reference to the three members of ASFGB Ltd, the Amateur Swimming Association (ASA), Scottish Swimming Association (SASA) and Welsh Swimming Association (WASA). By virtue of your membership direct or indirect to ASA, SASA and WASA you agree to your personal data being made available to ASFGB Ltd and its members, subject always to compliance with the Data Protection legislation. This does not include sensitive personal data such as health or medical conditions, which require the explicit consent of the data subject i.e. a signature for this specific purpose. Except to the extent that your club or ASFGB Ltd is required or permitted by law, (the information which you provide in this submission, and any other information obtained or provided during the course of your membership ("the Information")) will be used solely for the purposes of processing your application and dealing with you as a member. If you cease to be a member of the ASFGB Ltd, the Information will not be held for longer than is necessary, after which time it will be destroyed. You agree to use all reasonable endeavours to keep your club and ASFGB Ltd informed of any changes to your personal data. So that we may use the Information for the above purposes and on the above terms, we are required under the Act to obtain your consent. Members are therefore requested to sign the consent clause on the membership forms or by confirming on the club website by accepting the 'Data Protection Agreement' that they agree to the above by providing their data for electronic submission to the ASA, SASA or WASA.