

This policy applies to all persons working for LDS or on behalf of the Association in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, all of which are covered by the term “staff”. This policy does not form part of any contract of employment and we may amend it at any time.

Lothian Disability Sport (LDS) is committed to ensuring the safety and protection of any personal or sensitive personal data, which we process. This includes collection, storage, organising, amendment, deletion and sharing. Personal data refers to any data which can identify a living individual, or which in conjunction with other information likely to come into your possession, could identify a living individual. For LDS purposes this covers:

- Name
- Address
- Telephone number
- Email address and/or IP address
- Racial or ethnic origin
- Religious or similar beliefs
- Physical or mental health condition including disability

The Data Protection Act 1998, General Data Protection Regulations 2018 and UK Data Protection Bill (once this becomes an Act)

The legislation sets rules for processing data and applies to all records, manual and electronic.

LDS is a data controller which means we determine the purposes for which personal data is processed. From time to time we may employ data processors, which means any person or organisation other than a direct employee who will process data on our behalf. Under these circumstances LDS will ensure the data processor has a valid contract requiring compliance with all existing legislation and LDS remains legally liable for the data processing.

Data protection legislation provides eight data protection principles which require that personal data:

1. Shall be processed fairly and legally, being open and transparent about how data will be processed and a privacy notice must be available;
2. Shall be processed only for specified and lawful purposes and not be processed in a way which is incompatible with those purposes;
3. Shall be adequate, relevant and not excessive for the purposes for which it is collected;
4. Shall be accurate and kept up to date;
5. Shall not be kept longer than necessary;
6. Shall be respectful of individuals' rights;
7. Shall be kept secure by technical and organisational means against unauthorised and unlawful processing and against accidental loss, destruction or damage;
8. Shall be transferred outside the European Economic Area, e.g. through websites, only if privacy is respected.

LDS is registered as a data controller with the Information Commissioner's Office and must by law keep to these principles. If you believe in any way that LDS is not processing personal data in accordance with

these principles, please contact LDS Disability Sport Officer at admin@lothiandisabilitysport.co.uk or on 07885 549 173.

Purposes for Collecting Personal Data

All personal data provided to LDS is processed in accordance with the principles of existing legislation. LDS collects personal data for:

- Entry to LDS events, programmes, squads or courses
- Monitoring the delivery of LDS programmes and resources
- Research, development and evaluation of LDS programmes and resources
- Recruitment purposes
- Applications for grant funding
- Communication regarding LDS work
- Marketing of LDS programmes, resources and registration schemes
- Human resources and employment
- Acceptance for inclusion on a mailing list or database
- As a result of interaction with LDS (e.g. by entering into email or telephone correspondence with an employee of LDS)

Individuals must be adequately informed, in a manner appropriate to their age and understanding, of how LDS will process any personal data collected. If there is an intention to share any personal data with third parties, e.g. sponsors, SGBs, etc. this must be clearly explained to the individual.

Individuals have the right to access the personal data LDS holds on them and correct it if inaccurate. If you would like to receive a copy of this data please provide a written request evidencing who you are and the information you wish to access to admin@lothiandisabilitysport.co.uk

Data Processing

Data processing includes collection, storage and sharing of personal and sensitive personal information. Data must be stored on the LDS database and/or secure server. Where information is accessed through non-LDS computers, tablets, etc., any device used must have an up-to-date and currently supported operating system and a VPN must be used for access. Staff may choose to access emails and contacts through a mobile phone. Under these circumstances, all data must be password protected.

Data Retention

LDS is conscious of obligations to ensure that personal information is relevant, accurate, up-to-date and not retained for longer than necessary.

The following retention guidelines are in place:

- HR records: between 7 months and 6 years depending on the nature of documents. For full information refer to the LDS Human Resources Handbook
- Consent for filming, photography, etc.: 6 months from date of event
- Personal data relating to athletes, coaches, volunteers and officials will be retained for as long as it is understood the individual maintains an interest in disability sport, unless a request is received to delete information
- Data relating to awards and qualifications will be kept indefinitely. Any request to delete information will be handled on an individual basis
- Data relating to participation in events and competitions will be kept indefinitely. Any request to delete information will be handled on an individual basis

Data Protection Breaches

Any breach of data protection must be reported immediately to LDS Chair, or in their absence a nominated representative. Breach means loss or damage, or potential loss or damage, to data and include such circumstances as loss or damage to a computer or smartphone.

This will enable any breach to be reported to the Information Commissioner's Office within the mandatory 72 hours, including weekends and nights.