

# Tewkesbury Junior Anglers

## Tewkesbury Junior Anglers (TJA) Data Protection Policy (UK GDPR)

Version: 1.0

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### 1. Policy Statement

Tewkesbury Junior Anglers (TJA) is committed to protecting the privacy and security of personal data entrusted to us by our members, their parents/guardians, and our volunteers. We process personal data in compliance with UK data protection laws, including the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We are committed to transparency and fairness in how we handle personal information.

### 2. Purpose and Scope

- Purpose: This policy outlines TJA's procedures for lawfully processing personal data, ensuring the confidentiality and security of that data, upholding the rights of individuals (data subjects), and providing guidance to our volunteers on their data protection responsibilities.
- Scope: This policy applies to all personal data processed by TJA, relating to junior members, parents/guardians, volunteers, committee members, and any other individuals whose data we hold. This includes both personal data and special category data (such as health information). It covers data held electronically and in physical records.

### 3. Definitions

- Personal Data: Information relating to an identifiable individual (e.g., name, address, email, phone number, date of birth, photographs).
- Special Category Data: Sensitive personal data requiring extra protection (e.g., health/medical information, ethnicity, religion).
- Processing: Any operation performed on personal data (e.g., collecting, storing, using, sharing, deleting).
- Data Subject: The individual whose personal data is being processed.
- Data Controller: The organisation determining the purposes and means of processing personal data (TJA is the Data Controller).
- UK GDPR: The UK General Data Protection Regulation, which sets out the key principles, rights, and obligations for data processing in the UK.

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## 4. Data Protection Principles (UK GDPR Article 5)

**TJA adheres to the following core principles when processing personal data:**

- **Lawfulness, Fairness, and Transparency:** We process data lawfully (e.g., with consent, for legitimate interests), fairly, and transparently. We provide clear information (via Privacy Notices) about how data is used.
- **Purpose Limitation:** We collect personal data only for specified, explicit, and legitimate purposes (e.g., membership administration, safeguarding, communication regarding activities, emergency contact, volunteer management) and do not process it for incompatible purposes.
- **Data Minimisation:** We collect and process only personal data that is adequate, relevant, and limited to what is necessary for the stated purposes.
- **Accuracy:** We take reasonable steps to ensure personal data is accurate and kept up-to-date. We provide mechanisms for individuals to correct their information.
- **Storage Limitation:** We keep personal data in an identifiable format only for as long as necessary for the purposes it was collected. We follow retention guidelines (see Section 10).
- **Integrity and Confidentiality (Security):** We implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- **Accountability:** As Data Controller, TJA is responsible for demonstrating compliance with these principles. This includes maintaining policies, records, and providing training.

## 5. Lawful Basis for Processing

**TJA processes personal data based on one or more lawful bases, including:**

- **Consent:** For specific purposes like using photographs/videos in promotional materials or sending non-essential communications. Consent (especially parental consent for children) is obtained clearly and can be withdrawn. For special category data (e.g., medical/allergy information needed for safety), explicit consent is required.
- **Legitimate Interests:** For core operational purposes like managing memberships, communicating essential information about sessions/events, volunteer administration, and ensuring safety during activities, where these interests are not overridden by the individual's rights.
- **Legal Obligation:** To comply with legal duties, such as safeguarding requirements, DBS checks, and reporting serious incidents.
- **Vital Interests:** To protect someone's life (e.g., sharing medical information with emergency services in a critical situation).

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## 6. Data Subject Rights

**Under UK GDPR, individuals (data subjects) have the following rights regarding their personal data:**

- **Right to be Informed:** To receive clear and concise information about how their data is processed (usually via a Privacy Notice).
- **Right of Access:** To request access to the personal data TJA holds about them (a Subject Access Request - SAR).
- **Right to Rectification:** To have inaccurate personal data corrected or completed if incomplete.
- **Right to Erasure (Right to be Forgotten):** To request the deletion of their personal data, where there is no compelling reason for TJA to continue processing it (subject to legal/safeguarding overrides).
- **Right to Restrict Processing:** To request the limitation of processing under certain circumstances.
- **Right to Data Portability:** To receive their data in a portable format (less likely applicable to TJA's typical data).
- **Right to Object:** To object to processing based on legitimate interests or for direct marketing purposes.
- **Rights related to Automated Decision Making/Profiling:** TJA does not typically conduct such activities.
- **Individuals wishing to exercise these rights should contact the Named Person for Data Protection (see Section 7). TJA will respond to requests in accordance with UK GDPR timescales (usually within one month).**

## 7. Named Person for Data Protection

TJA has designated the Committee Secretary as the primary point of contact for data protection matters.

- **Designated Role:** TJA Committee Secretary
- **Contact Details:** Gareth Ferbrache, gferbrache.gf@gmail.com
- **Responsibilities:** Acting as the first point of contact for data protection queries and requests (including SARs), advising the Committee on data protection compliance, promoting awareness among volunteers, liaising with the Information Commissioner's Office (ICO) if necessary, and assisting with data breach management.
- **(Note: While this role handles coordination, all committee members and volunteers share responsibility for handling data correctly according to this policy).**

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## 8. Data Security

**TJA implements appropriate measures to protect personal data, including:**

- **Physical Security:** Storing paper records containing personal data in locked cabinets or secure locations.
- **Digital Security:** Using password protection on computers, files, and databases storing personal data; using secure cloud storage where applicable; considering encryption for sensitive data transfer.
- **Access Control:** Limiting access to personal data only to those volunteers who need it for their specific role (e.g., coaches accessing registers, Safeguarding Lead accessing sensitive welfare information).
- **Secure Disposal:** Shredding physical documents and securely deleting electronic files when data is no longer required according to retention schedules.
- **Data Breach Procedures:** Having procedures in place to detect, report, and investigate personal data breaches, notifying the ICO and affected individuals where required by law.

## 9. Data Sharing

**TJA will only share personal data with third parties when there is a lawful basis to do so and appropriate safeguards are in place. Examples include:**

- Sharing registers/contact details with coaches/lead volunteers for specific sessions.
- Sharing information with emergency services if required to protect vital interests.
- Sharing information with Children's Social Care (MASH), LADO, or Police as required for safeguarding purposes or legal obligations.
- Sharing necessary information with the Disclosure and Barring Service for DBS checks.
- Sharing limited information with governing bodies (e.g., Angling Trust) for membership registration or insurance purposes, where applicable and communicated in privacy notices.
- Sharing information with external training providers (with consent/as necessary for booking).

We will not share personal data with third parties for marketing purposes without explicit consent.

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## **10. Data Retention**

TJA will retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including satisfying any legal, accounting, safeguarding, or reporting requirements. A data retention schedule outlining specific retention periods for different types of data (e.g., membership forms, volunteer records, incident reports, DBS information) will be maintained and followed.

## **11. Training and Awareness**

Volunteers who handle personal data as part of their role will receive appropriate guidance and awareness training on their data protection responsibilities, including understanding this policy, secure data handling, and reporting procedures. This will form part of the induction process and ongoing volunteer support.

## **12. Privacy Notices**

TJA will provide clear and accessible privacy notices to individuals (e.g., on membership application forms, volunteer agreements, website) explaining what personal data we collect, why we collect it, how we use and store it, our lawful basis for processing, data retention periods, and their data subject rights.

## **13. Policy Review**

This Data Protection Policy will be reviewed annually by the TJA Committee, or sooner if required due to changes in legislation, guidance, or TJA's data processing activities.