



## Scottish Disability Sport

### Data Protection Policy

Reviewed by Board – February 2024

Scottish Disability Sport (SDS) is committed to ensuring the safety and protection of any personal data, 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, could identify a living individual. For SDS purposes this covers:

- Name
- Address
- Telephone number
- Email address and/or IP address
- Sex
- Sexual orientation
- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Racial or ethnic origin
- Religious or similar beliefs
- Physical or mental health condition, including disability

#### **The UK Data Protection Act 2018 and UK General Data Protection Regulation (GDPR)**

The legislation sets rules for processing data and applies to manual filing records and data held on computers.

SDS 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 SDS will ensure the data processor has policies and procedures in place which comply with all existing legislation and SDS remains legally liable for the data processing.

Legislation provides eight data protection principles which require that personal data:

1. Shall be processed fairly and legally, meaning we must be 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 only if privacy is respected

SDS is registered as a data controller with the Information Commissioner's Office and by law, data controllers have to keep to these principles. If you believe in any way that SDS is not processing your personal data in accordance with these principles, please contact SDS Chief Executive Officer, Gavin Macleod at [gavin.macleod@scottishdisabilitysport.com](mailto:gavin.macleod@scottishdisabilitysport.com) or on 0131 3171150. If you remain dissatisfied you have the right to contact the Information Commissioner's Office to make a complaint [www.ico.org.uk](http://www.ico.org.uk), helpline 0303 123 1113.

### **Purposes for Collecting Personal Data**

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

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

Individuals must be adequately informed, in a manner appropriate to their age and understanding, of how SDS 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 SDS 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@scottishdisabilitysport.com](mailto:admin@scottishdisabilitysport.com).

### **Data Processing**

Data processing includes collection, storage and sharing of personal and sensitive personal information. Data must be stored on the SDS database and/or secure server. Where information is accessed through equipment not owned by SDS, any device used must have an up-to-date and currently supported operating system. Where information is accessed through a mobile phone, all data must be password protected,

### **Data Retention**

SDS is conscious of its 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 SDS 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 individuals 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.

### **Passing personal data onto third parties**

It is SDS policy to only disclose information to third parties if explicitly required to do so by relevant legislation or if working in partnership with another governing body or organisation.

SDS will obtain your consent before passing on any information to any third parties other than those involved in the co-ordination of SDS programmes.

SDS does not collect or compile personally identifying information for dissemination or sale to external parties for marketing purposes or host mailings on behalf of third parties.

### **Privacy Notice**

Our full privacy notice can be seen on our website at [www.scottishdisabilitysport.com/privacy-notice/](http://www.scottishdisabilitysport.com/privacy-notice/) or if you would like to receive a hard copy please contact us on 0131 317 1130 or email [admin@scottishdisabilitysport.com](mailto:admin@scottishdisabilitysport.com).

### **Data Protection Breaches**

Breaches are loss or damage, or potential loss or damage, to data and include such circumstances as loss or damage to a computer or smartphone.

Any breach of data protection must be reported immediately to Gavin Macleod, CEO or in his absence a nominated representative.

All breaches must be reported to the Information Commissioner's Office within 72 hours, including weekends and nights.

February 2024