



DATA PROTECTION

Table Tennis England Data Protection Policy

Introduction

This is the Data Protection Policy of the English Table Tennis Association Ltd, hereinafter known as (or referred to as) Table Tennis England.

The Data Protection Act applies to electronic and paper records held in structured filing systems containing personal data, meaning data which relates to living individuals who can be identified from the data. This includes any expression of opinion about an individual and intentions towards an individual. It also applies to personal data held visually in photographs or video clips (including CCTV) or as sound recordings. Table Tennis England collects a large amount of personal data every year including:

- staff records and references
- membership records, including players and coaches
- names and addresses of those requesting information
- limited information for fee collection for online transactions
- different types of research data used by Table Tennis England

The Data Protection Act 1998 governs the use of personal information through the eight data protection principles. These principles require that personal information is:

- processed fairly and lawfully
- processed for one or more specified and lawful purposes, and not further processed in any way that is incompatible with the original purpose
- adequate, relevant and not excessive
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary for the purpose for which it is being used
- processed in line with the rights of individuals
- kept secure with appropriate technical and organisational measures taken to protect the information
- not transferred outside the European Economic Area (the European Union member states plus Norway, Iceland and Liechtenstein) unless

there is adequate protection for the personal information being transferred.

Table Tennis England, acting as custodians of the personal data, recognises its duty to ensure that all data is handled properly and confidentially at all times during the lifecycle of the data, as follows:-

- the obtaining of personal data;
- the storage and security of personal data;
- the use of personal data,
- the disposal/destruction of personal data.

Implementation

Table Tennis England will undertake the following;

- nominate a "Data Protection Controller", responsible for gathering and disseminating information and issues relating to information security, the Data Protection Act and other related legislation;
- ensure that all activities that relate to the processing of personal data have appropriate safeguards and controls in place to ensure information security and compliance with the Act;
- external third parties (for example funders) - where personal data is processed - make reference to the Act as appropriate;
- ensure that all staff acting on Table Tennis England's behalf understand their responsibilities regarding information security under the Act, and that they receive the appropriate training / instruction and supervision so that they carry these duties out effectively and consistently and are given access to personal information that is appropriate to the duties they undertake;
- ensure that all third parties acting on Table Tennis England's behalf are given access to personal information that is appropriate to the duties they undertake and no more;
- ensure that any requests for access to personal data are handled courteously, promptly and appropriately, ensuring that either the data subject or his/her authorized representative has a legitimate right to access under the Act that the request is valid, and that information provided is clear and unambiguous. All actions regarding data subject access requests will be logged. This audit trail will include details regarding the nature of the request, the steps taken to validate it, the information provided as well as any withheld, e.g. for legal reasons.

- never, under any circumstances, exploit your data for commercial gain but it may, from time to time, release your personal data to other National Governing Bodies for UK sport and Government agencies involved in sport in the UK. In these circumstances, the data will be held for the duration of the project and destroyed immediately after use
- allow you to request that your data is held solely for the purposes of Table Tennis England.

This can be achieved by you making the request (in writing) to the Data Protection Officer, at the following address:

Table Tennis England
 Norfolk House
 88 Saxon Gate West
 Milton Keynes MK9 2DL

- work towards adopting, as best working practice, the key principles of BS7799- the British Standard on Information Security Management;
- Implement a security policy for controlling staff use of data and governing staff handling of personal data
- review this policy and the safeguards and controls that relate to it annually – to ensure they are still relevant, efficient and effective.

Table Tennis England responsibilities under the Act

Data Protection means that Table Tennis England must:

- manage and process personal data properly
- protect the individual's rights to privacy
- provide an individual with access to all personal information held on them

Table Tennis England has a legal responsibility to comply with the Act. The Senior Management Team member with overall responsibility for this policy is the Operations Manager. Table Tennis England, as a corporate body, is named as the Data Controller under the Act.

Table Tennis England is required to notify the Information Commissioner of the processing of personal data and this is included in a public register.

The public register of data controllers is available on the Information

Commissioner's website.

Table Tennis England's Operations Manager is responsible for drawing up guidance on good data protection practice and promoting compliance with this guidance through advising staff on the creation, maintenance, storage and retention of their records which contain personal information.

Every member of staff that holds information about identifiable living individuals has to comply with data protection in managing that information. Individuals can be liable for breaches of the Act.

Table Tennis England acknowledges the rights of individuals to whom personal data relates, and ensure that these rights may be exercised in accordance with the Act;

- ensure that both the collection and use of personal data is done fairly and lawfully;
- ensure that personal data will only be obtained and processed for the purposes specified;
- collect and process personal data on a "need to know" basis, ensuring that such data
- is fit for the purpose, is not excessive, and is disposed of at a time appropriate to its purpose;
- ensure that adequate steps are taken to ensure the accuracy and currency of data;
- ensure that for all personal data, appropriate security measures are taken both technically and organisationally - to protect against damage, loss or abuse;
- ensure that the movement of personal data is done in a lawful way - both inside and outside

Table Tennis England and that those suitable safeguards exist at all times.

Guidance

Guidance on the procedures necessary to comply with this policy is available from the Operations Manager. This guidance covers:

Introduction to Data Protection including Data Protection principles,

types of data involved and key concepts

Best practice guidelines including:

- use of personal data by employees and volunteers
- transfer of personal data to third parties (inc volunteers)
- security of personal data –

You should be able to "completely" restore from a catastrophic failure, from at least two previous full backups, just in case the last is damaged, lost, corrupt, etc.

A "Good" backup regime should contain at least one full backup within a chosen cycle, normally weekly.

A "Good" backup practice is to store backups away from the current data location, preferably off-site.

Dynamic data should be backed-up during "dead periods" to avoid fuzzy backups (data is changing as you backup it up, potentially leading to related information not in sync when backed up)

- Use of personal data in research
- Confidential references
- Transfer of personal data to non - EEA countries

Guidance for the public on Data Protection and how to make a request is available on the Data Protection internet pages.

Status

This policy was approved by the Senior Management Team in April 2014. It will be reviewed annually.

Contacts

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Data Protection Officer
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Table Tennis England.

Data Protection Act Guidelines for Holding Personal Data

These guidelines are intended to help Local League and Club officials who are responsible for gathering and maintaining personal data relating to playing and associate members of Table Tennis England. Table Tennis England is registered with the Data Protection Registrar and our registration number is Z7407923. A full copy of Table Tennis England Data Protection Policy is available on Table Tennis England website www.tabletennisengland.co.uk/dataprotection

Personal data is defined as data relating to a living individual, who can be identified from:

- That data;
- That data and other information which is in the possession of, or is likely to come into the possession of the data controller and includes an expression of opinion about the individual and any indication of the intentions of the data controller, or any other person in respect of the individual.

You must process personal information fairly. The following short checklist will help you comply with the Data Protection Act (the Act). Being able to answer 'yes' to every question does not guarantee compliance, but it should mean that you are heading in the right direction. It will also give you some help dealing with questions from your members.

Do I (as a Local League or Club Secretary or other Table Tennis England official) really need this information about an individual? Do I know what I'm going to use it for?

YES - You are gathering data on behalf of Table Tennis England and this

data will be exclusively used for the purposes of furthering that individual's involvement in Table Tennis. It also helps us all to provide benefits to the member such as the Civil Liability Insurance, where we are required to provide personal data for every member who is covered by the insurance.

Do the players and volunteers whose information I hold know that I've got it, and are they likely to understand what it will be used for?

YES - They will have initially provided this information to you, the official, as the Local League or Club which represents them, so that you (and others involved in our sport) can keep in touch with the individual. We also must have the information for the purposes of the Civil Liability Insurance arrangements.

Am I satisfied the information is being held securely, whether it's on paper or on computer?

YES – all information, whether received electronically or in paper format, is held securely within Table Tennis England in electronic format. Any paper documents, once converted to electronic data, are shredded by a professional company. Our electronic data is held on a secure server which is backed up daily. The data is accessed by Table Tennis England staff, at Head Office and within regions, on a 'need to know' basis only. If you need to hold paper records you must ensure they are held in a secure place ie under lock and key.

Will Table Tennis England staff be trained in how to handle data in paper and electronic formats and will they understand when and under what circumstances to release data?

YES – the data controller has a security policy and this has been communicated to all staff, but particularly those handling personal data, where additional training takes place. The Security policy includes the steps to proper identification of people requesting information over the telephone. Additionally, staff cannot remove data from the secure office premises without the permission of the Data Controller.

If the Local League or the Club has a website and personal information is held on that website, is it secure?

YES - Where the information is passed to Table Tennis England and it is used on Table Tennis England web site – this will be held securely, as defined above. If the Local League or the Club has a website any information relating to the individual must only be accessed by a username and password protected access route. This means that the official who owns or controls the PC must protect the data via username and password. The password must be a secure password (a mix of upper and lower case alpha plus numbers or symbols) and should be changed every 3 months.

- You must be able to provide to your member with the following
- the identity of the person or organisation responsible for operating the website and of anyone else who collects personal information through the site;
 - what you will process their information for; and
 - any other information needed to make sure the processing is fair to individuals, taking account of the specific circumstances of the processing. This will include telling individuals if you will disclose any information about them to third parties, including to other companies within the same group.

Am I sure the personal information I have for my players and volunteers is accurate and up to date?

YES – Although you cannot be certain that at all times member data you hold is totally correct, given that the members may not pass on changes to you in time, or at all. What you must do is ensure that the information you receive is processed in a timely manner. Of course under Individual Membership this responsibility will transfer to the member, given that they can update their own records. However, many will still use the club to notify changes to personal information. In this case you should update their records or notify Table Tennis England as soon as possible.

Do I delete/destroy personal information as soon as I have no more need for it?

YES - Paper records should be destroyed immediately and electronic records deleted from your system once a member notifies you that they are ceasing their membership of the club. Table Tennis England will

archive these records and retain them for a period of 3 years and then they will be removed from the system

Is access to personal information limited only to those with a strict need to know?

YES – Supplying Table Tennis England with your member’s personal data complies with this “need to know” basis. However, at a local level, you need to ensure compliance with this requirement by ensuring that you are satisfied that the “need to know” exists. Table Tennis England will never, under any circumstances exploit your data for commercial gain. It may, from time to time, release information to other NGB’s or Government bodies for the purposes of market research. The membership form allows you to opt out of even this limited use of your data.

If our Local League or Club has paid employees (volunteers who may be paid expenses are not deemed “paid” employees) and I want to put staff details on our website have I consulted with those members about this?

YES - This will probably only apply to coaching staff who deliver sessions at the club and you need to make sure that if you place their details on your website, or publicise them in any other way, that you seek their permission before doing so.

If I’m asked to pass on personal information, am I and my volunteers clear when the Data Protection Act allows me to do so?

YES - You should only really be passing the information to Table Tennis England. When you pass information to Table Tennis England, Table Tennis England is registered and fully compliant to hold data about players and volunteers who are members of your club or League

Would I know what to do if one of my players or volunteers asks for a copy of the information I hold about them?

YES – All your members have a right to view the data we hold about them and a right to amend the data if they feel it is incorrect. However, any member only has a right to view and amend their own personal data. Please note that the Freedom of Information Act only applies to

Public Bodies and publicly owned private companies. The vast majority of private companies (such as Table Tennis England) fall outside of this Act.

Do I have a policy for dealing with data protection issues?

YES - Table Tennis England can supply a copy of their Data Protection Policy and as an affiliated Local League or Club you are covered under our umbrella registration number Z7407923. Furthermore you do not need to notify the Information Commissioner about any aspect of the data you hold, because you are a “not for profit” organisation affiliated to Table Tennis England.