

Devon Schools' Athletic Association Data Protection Policy

From 25th May 2018 the laws surrounding Data Protection Act (1998) were added to, realigned and tightened by the implementation of the EU General Data Protection Regulation (GDPR).

DSAA treats your privacy with the highest regard and needs to ensure that other organisations that we share your data with can demonstrate GDPR compliance. In accordance with the 1998 Data Protection Act, we guarantee that we will only ask you, your school teachers and area secretaries to supply personal data which is actually needed to enable us to process your entry for the specific competitions you are involved with, and we guarantee that any data you supply will only be used for that purpose.

Your data won't be passed to anyone other than necessary data to the Area Secretaries, County Track and Field, Cross-country and Combined Events organisers. For athletes qualifying for subsequent competitions at regional and national level, relevant information will be passed to South West Schools and English Schools competition organisers.

How do we look after your data?

DSAA collect paper forms from you, your school teachers or via Area Secretaries so that we can run the Devon Schools' Track and Field, Cross-county and Combined Events competitions. Some of this data is then processed electronically and stored on memory sticks/external hard drives. Everyone involved in collecting and looking after your data understands the importance of keeping your data secure at all times, and only using it for the purpose indicated here. Some of your personal data will be passed onto other third-parties such as programme printers, results processors and results publishers.

Details of results of events of events which might be published on the Internet could remain in the public domain for as long as it is historically valid and useful. Such details will be restricted to name, sex, age-group, team or school, area and actual performances at each event. We will NEVER disclose personal information such as Dates of Birth, your address, and other contact information such as phone numbers and email address.

DSAA collects information on an annual basis and only exists for the year in which the competitions take place. Dates of birth for athletes who are selected for DSAA will be kept securely by the trusted DSAA competition organisers, until you are not available for County Selection, and will only be kept for as long as you are eligible to represent DSAA.

DSAA does not use cookies on its website.

What do we do with your data

Name DSAA requires an athlete's first and last name.

This may be published in an event programme and will appear in the results of events, both printed and online. Results may be sent to newspapers or magazines for wider

distribution. This information will also appear on any printed certificates to be handed out to you in recognition of your achievement and will appear on entry forms to subsequent regional and national competitions.

Sex – This is obtained by you indicating in which age group you are eligible to participate in such as Junior Girls or Inter Boys

Your Address will only be used by County Team Managers to send you the details necessary for you to participate in the events and competitions you are selected for, and to receive any subsequent post-event certificates, results or other information. Your address will not be passed onto anyone else such as sponsors or institutions offering scholarships unless you specifically give us permission.

Your school/college. DSAA requires the name of the school/college an athlete attends to check eligibility and that the school/college is affiliated to the Area it belongs in.

This might be published in area and county results and might be shared with your local newspapers so that they can feature specific athletes in specific events. Your selection for DSAA will be available on the DSAA website and will include your name and school/college

Your date of birth is required to ensure entry into the correct age group. This will be included on the entry forms to subsequent regional and national competitions

DSAA considers this to be sensitive personal information. DSAA will never publish dates of birth. Age data will be used and published in the results of events at the most general level, such as Intermediate Girls or simply, IG.

Phone Numbers. DSAA will ask you for your mobile telephone number. This is essential for safeguarding reasons and in the case of urgency. An additional contact number is required in the case of an emergency.

DSAA considers this to be sensitive personal information. This information will not be disclosed to anyone other than the organisers of each event, DSAA District team managers and DSAA team managers.

Email address. DSAA will ask you for your email address. This is necessary as it a common communication method between DSAA and an athlete

DSAA considers this to be sensitive personal information. This information will not be disclosed to anyone other than the organisers of each event, DSAA Area team managers and DSAA team managers.

Event season's best performance. You may be asked for this information if it cannot be found elsewhere. This information will be used within entry procedures and a championship's organisation to ensure an athlete is in the correct event heat or pool for their ability

This will be included in entries to DSAA, SWSAA and ESAA championships. It will also be required by DSAA selectors when considering discretionary selection due to an athlete not taking part in an area or county event due to injury or other personal circumstances.

Athlete performances will appear in the results of an event, may be printed on certificates and may appear in historical records.

Medical Information. DSAA will ask for current medical information from those athlete's who are representing the County at championships. This information may also be required by area team managers for the relevant County Championships.

Up-to-date medication and notification of medical conditions, such as asthma or allergies are required so team managers are aware of possible reactions whilst travelling to championships, in overnight accommodation and food outlets, and importantly during competition. If requested, this information will be passed to the accredited First Aid personnel at a championship.

Up-to-date medication details are required in the eventuality that an athlete is randomly chosen to submit a urine sample for analysis by the accredited testing laboratory at an ESAA championship. (ie. a drug test).

DSAA considers this to be sensitive personal information. This information will not be disclosed to anyone other than DSAA team managers, First Aiders, and testing laboratory staff.

Chest and Waist size. This is required by the DSAA kit manager so that the correct County vest and shorts can be made available for DSAA team managers to give out at regional and national events. This is also required when DSAA are ordering tracksuits for athletes to purchase on request.

Data Protection Rules. The Data Protection Act and GDPR states that data collected must be adequate, relevant, accurate, up-to date and not kept for longer than it is needed.

Data would be updated when an athlete is at the end of a competitive season, when an athlete moves up to another age group, or when an athlete moves school/college within the County.

Data is deleted when an athlete leaves a Devon school/college, or when an athlete is too old DSAA championships, unless we acquire a new consent to retain it.

Medical information is only relevant to one championship and is deleted immediately after its conclusion.

Consent:

An athlete's consent allows DSAA to acquire and process data, but only if we have proof that we have prior permission to do so.

All such consents can only be given freely and unconditionally, after an athlete has been made fully aware of exactly what the data is, what it will be used for, and to whom it may be passed.

GDPR states that the consent must be a 'clear affirmative action' and that this is 'verifiable'

DSAA currently uses paper forms to collect relevant information. These forms indicate that the information provided will only be used by DSAA for the purposes of communication, kit provision, and completion of entry forms. It also informs athletes that full details of the DSAA Data Protection Policy can be found on the DSAA website. A printed copy of the DSAA Data Protection Policy will be available at the Area Championships where most of the DSAA Athlete Information forms are completed.

Participation in DSAA activities is not conditional on an athlete consenting to giving such data, although in practice, without providing the necessary information, it would be very difficult to enter DSAA activities.

GDPR states that an individual has the 'right' to be forgotten'.

The saving and publishing of historical records are excluded from the regulation. However, athletes have the right to request any record of them be deleted from the DSAA website or future DSAA publications.

At DSAA events, either hosted or entered, there will be numerous photographers and thus many images of athletes taken. Many of these will be posted on social media, some in the press, and some may be posted on the DSAA website (for which permission would be sought). Athletes have the right to request any image of them, where they are the focus of the image, be deleted from the DSAA website or future DSAA publications.

Storage

The data DSAA acquires from an athlete, an athlete's school/college teachers, or area secretaries is stored electronically on personal computers, or on paper forms at their premises or school/college. It is the responsibility of DSAA officials, area secretaries and event organisers to ensure that this data is kept secure and only used as set out in this policy.

GDPR requires that any statement requiring consent from children must be capable of being understood by a 13-year-old child.

DSAA strives to make its forms and this policy easy to read.

A comprehensive step-by-step explanation of the GDPR regulation is displayed on the webpage <http://www.sendentry.com/gdpr/gdpr.html>

DSAA is affiliated to ESAA. On its website there is an in-depth explanation of the GDPR legislation and how it relates to ESAA activities: <http://www.esaa.net/v2/info/privacy.php>

The detailed information on the two above web pages has been compiled by Joe Lee, the Data Controller for ESAA, to whom DSAA is most grateful.

The GDPR legislation in full can be viewed on the website of the Information Commissioner's Office: <https://ico.org.uk/>

This is a working document, particularly as DSAA may introduce new events, championships and organisational structures requiring Data Protection update, and is considering moving to a web-based form entry.

The Data Controller for DSAA is Gary Brock (Chairman of DSAA). Any breaches of data must be reported to him (a legal requirement). He will log the breach and evaluate the seriousness of the breach give guidance and take any appropriate action. Any serious data breach may be reported to the ICO.

Gary Brock
May 2018