

Morpeth Amateur Swimming Club



Privacy Notice for Members

September 2020

Introduction

Morpeth ASC is committed to complying with data protection law and to respecting the privacy rights of members. This document outlines our compliance with the **General Data Protection Regulations (GDPR)** of 2018.

The new regulations mandate a higher level of **transparency and accountability** in terms of the processing of the personal details of members. All organisations now have a duty to ensure that people know what data is being collected about them, what it will be used for, where it will be stored, how long it will be stored for and that it will be secure.

All club members, which include swimmers, administrators and coaches, but also the swimmers' parents, are **data subjects** in the eyes of the law. Morpeth ASC acts as a **data controller** for the personal data members provide.

The **legal basis** for processing this personal data is the **legitimate interest basis**. Morpeth ASC is run by a volunteer committee representing all swimming parents and we all share the same "legitimate interest" in providing a safe and supportive amateur sports environment for our children. This inevitably requires the handling of the personal information of swimmers and their parents as outlined in this policy.

Morpeth ASC is not involved with **commercial or marketing activities**. Members are notified periodically about the opportunity to purchase club kit (tops, shorts and hats with club logo) but the club kit sales we make to members are not for profit. Instead, these outfits are designed to promote club identity and team spirit.

As Community Amateur Sports Club (CASC) Morpeth ASC is not required to have a designated **Data Protection Officer (DPO)**.

Instead, data protection is a shared responsibility for all club officials, who are all bound by Swim England's **Code of Ethics, Rules and Laws**. This includes a requirement for confidentiality when dealing with "information of a personal nature".

This Privacy Notice may be amended from time to time.

What personal data does Morpeth ASC collect and who has access to it?

Data collection begins with the club **membership form** that parents complete upon joining the club. The form collects a basic set of data required for the club's administrative purposes as well as the mandatory registration of the swimmer with **Swim England**, our governing body.

The basic data set comprises:

- Name of the swimmer
- Date of birth
- Address and parent / carer name and contact details, incl. email address
- Two further emergency contacts
- GP details for emergencies and medical information relevant to the sports activity

The membership form can either be handed in at poolside and a **coach** will forward it to the **Membership Secretary** or it can be posted into the red poolside payments box from where the **Treasurer** will forward it to the Membership Secretary. Alternatively, it can be emailed to the membership secretary.

The form also includes a **signed and dated consent section** and is retained by the Membership Secretary for the duration of the membership.

It is important that members ensure that the personal information we hold about them is accurate and up-to-date and that they notify us about any changes.

As the swimmer participates in club activities, his/her **name, age and squad allocation** will become known to many club officials involved with poolside. Other personal information, however, will only be accessible to few officials on a need to know basis as detailed below:

1. **The Head Coach** has access to parent contact details to disseminate relevant club information but will also have the swimmer's date of birth in order to determine eligibility for squads, galas and events.
2. **The Coaches** at poolside will know of any medical conditions and other issues that may affect the swimmer's safe participation in training. They also have access to emergency contact details (including GP details) which are kept in a folder at poolside during training but are securely locked away at all other times and are not accessible to other club officials. Our club Covid lead and the head coach will also confidentially hold Covid related information collected from members (e.g. from online questionnaires) in order to establish the period during which a member may need to self-isolate.
3. **The Gala Secretary** has access to parent contact details to disseminate gala related information and captures current email addresses whenever a swimmer enters a gala to feed back entry information. He / she also needs to know dates of birth to ascertain eligibility for age specific events.

The Gala Secretary retains electronic entry records containing personal information of

the entrant, either in online systems with password protected access or password protected on PC or laptop.

4. **The Chairman** of the club has access to parent contact details.
5. **The Treasurer** has access to parent contact details.
He/she keeps members' names in spreadsheets to correlate payments made. These spreadsheets may be stored - password protected - on a cloud service, PC and laptop to ensure that the carefully crafted data set is not lost and always up-to-date.
While the treasurer has access to dates of birth (which will be stored on the Swim England online membership platform where the club's invoices from Swim England are managed), they generally have no need to access these.

When payments are made by members into the MASC Barclays bank account (usually by **Standing Order** or bank deposit), the sender's bank details cannot be seen on the statement, which shows only the sender's name and payment reference.
Morpeth ASC does not have a Direct Debit facility and hence we do not have personal bank account details of members.

Record of cash and cheque payments: In order to maintain a transaction history for all non-electronic payments, an electronic record is made that contains the following data for each payment: Name associated with payment, payment purpose, amount, type and date.

It also contains a photograph of the payment envelope / cash / cheque in case of queries. Photos of cheques are done without the account number showing.

The annual print out of this record is filed in the folder for that club year. The electronic data file is destroyed when the account is signed off as correct by the accountants.

Financial club records: At the end of each club year, a folder is retained which includes all of the club's finances, including invoices, for the year. This will contain only swimmers' names, although parent names may also occur on invoices and children's dates of birth on Gala entry records.

The recent folders reside in the treasurer's house. Older folders (>10 years) are destroyed.

6. The club's **SwimMark representative** holds limited personal details of all members who volunteer for the club: names, coaching qualifications and Swim England registration number.
SwimMark is Swim England's club development framework with a focus on Long Term Athlete Development and we at Morpeth ASC are proud to have achieved SwimMark accreditation.
7. The club's **Welfare Officer** ensures that all volunteers who help at poolside have the required child safeguarding training and DBS checks and therefore holds personal data on these members to facilitate this process.
8. The **Club Kit and Parent Liaison** will liaise with interested parents, make sales of tops, shorts, swim hats and other kit with MASC logo, will keep a record of these sales.

How secure is a member's personal data with Morpeth ASC?

Morpeth ASC officials are committed to keeping personal data files secure, be they on paper (kept in the official's "locked house") or electronic (stored on personal IT equipment with password protection).

How is personal data shared with Third Parties?

SWIM ENGLAND

The set of data collected by the Membership Secretary is shared with Swim England for registration purposes.

The email address will be used by Swim England to email membership related information to the member (e.g. membership number and benefits). Swim England does not send marketing emails.

Both the Membership Secretary (Administrator for Swim England membership) and the Treasurer (Deputy Administrator) have access to the **Swim England Online Membership management system** and continue to access these registration details as required. The Membership Secretary retains the paper copy of the membership form in a folder at home.

Additionally, this initial membership process also seeks your consent for the swimmer's name to appear alongside their club, Morpeth ASC, on the **publicly accessible British Swimming rankings database** (swimmingresults.org), where all swimmers' official times are recorded and shown alongside the swimmers club.

This database informs gala organisers about the eligibility of any swimmer for Swim England accredited events. Without this consent, entry into galas is more complicated.

PARENT MAIL (CONTACT GROUP)

Swimmer name, parent's name and parent's email address and telephone number are **shared with Parent Mail**, "a leading provider of communication and data services in the education sector", an online platform primarily used by schools, for contacting parents / members and for batch emailing club information to them. Parent Mail are UK based, store contact information in accredited UK data centres and have published their own GDPR compliance document. They do not themselves communicate with our members.

Only few club officials (Chairman, Membership Secretary, Treasurer, Gala Secretary and Head Coach) have access to the members' contact details on CallParents.

Recipients of club emails sent through this service cannot see the other recipients' email addresses. We do not currently use parents' phone numbers for administrative purposes.

GALA HOSTS

When a swimmer enters a Swim England accredited gala, the Gala Secretary may share their name, date of birth or qualifying age as well as Swim England registration number with the host club's gala manager, either by email or via an online gala entry system (see below). This is to ensure the swimmer is eligible for the age group and events they have entered into.

Rarely, Morpeth swimmers may qualify for international events and their data would then have to be transferred across borders.

ONLINE GALA ENTRY SYSTEMS

If a swimmer enters a gala, their name, date of birth or qualifying age are also entered into online gala entry systems like Typeform, HyTec or Sportsystem, alongside Swim England registration number and ranking times of the entrant. Access to the online data records is password protected.

MORPETH ASC WEBSITE, CLOSED FACEBOOK PAGE AND TWITTER FEED

The MASC website (www.morpeth-asc.org.uk) will frequently contain names of competing swimmers in the gala entry spreadsheets.

Likewise, the newsfeed on the various social media platforms will frequently contain swimmers' names after noteworthy achievements or in gala entry lists for parents to double check. In particular, news of upcoming galas often first appear on the club's closed Facebook page and parents are encouraged to join.

Photographs: Unless **consent for photography** was withheld in the signed membership form consent section, group photos at or after galas or special events may be published on the following platforms (and may be accompanied by **swimmers' names**):

- the closed **Facebook** page (Morpeth Amateur Swimming Club)
- the club's **Twitter** feed (Morpeth ASC).
- the club's **notice board** in the Leisure Centre
- occasionally, the **local media** (e.g. Morpeth Herald).

Photographs of swimmers will never be shared or published anywhere else (except by agreement from the individuals concerned).

In terms of **video photography** of swimmers for coaching purposes, these videos will never be shared and only be used by coaches for the relevant coaching episode and then deleted. Swimmers or their parents may, of course, decline consent for video photography.

THE MORPETH ASC BARCLAYS ACCOUNT

If a member sends bank details to the treasurer when a refund is due, e.g. by email, these bank details will be shared with Barclays and will appear in the payee list of the secure Barclays online account but will be deleted from there if the payment is a likely one-off. Otherwise, account details are not shared with anyone.

ACCOUNTANTS

For many years, Ryecroft & Glenton accountants in Morpeth have checked and signed off our club accounts. The files submitted include invoices, gala information and club spreadsheets all of which contain member names, ages and some contact details. However, the accountants are also bound by privacy and confidentiality laws.

LAW ENFORCEMENT

This section would be incomplete without saying that the club may share personal details with law enforcement agencies to assist with the investigation and prevention of crime.

How long will we keep your data and what are your rights?

We keep a member's personal details for as long as they remain a member.

When a member leaves the club,

- their **Swim England membership** will lapse at the next renewal (the next end of December). Their details will still be visible to the Membership Secretary and the Treasurer for about 6 months after the lapsed renewal.
- their **MASC membership** form will be destroyed after their Swim England membership lapses **and** the club has received a cancellation of membership or has reason to believe that the swimmer has permanently left the club.
- the member may need to request to be deleted from the club's **Parent Mail contact list** by contacting the Membership Secretary (asareg@morpeth-asc.org.uk) to stop receiving club emails.
- their name and age or date of birth will remain in password protected spreadsheets and files of the Treasurer and Gala Secretary as part of the historical record of their membership and payment history but these are not shared. The club's annual accounts folders are traditionally kept for 10 years and then destroyed.

With regard to data held by Swim England, the record of swimmers whose membership lapses after they stop swimming (name, address, contact details) is kept for 6 years before it is deleted (communication from SE membership services, 2018). Earlier deletion can be requested only by the swimmer / guardian by emailing renewals@swimming.org. A "subject access request" can also be made to Swim England to obtain a copy of the details held.

As a data subject you have the right to request access to and information about the personal details Morpeth ASC holds about you and your swimmer.

Who can you contact with queries about your personal data held at MASC?

Please contact **the Chairman** (chair@morpeth-asc.org.uk) or **the Treasurer** of the club (treasurer@morpeth-asc.org.uk) if you have questions or concerns about your personal data or the content of this policy.

*Author of this Privacy notice: Andreas Leja, volunteer treasurer of Morpeth ASC
Please don't hesitate to point out to me any omissions or legal imprecisions (treasurer@morpeth-asc.org.uk).*