



Patron: The Duke of Richmond and Gordon

Chichester Boys' Club CIO

Data Protection Policy

Introduction

Chichester Boys' Club recognises that we hold sensitive/confidential information about young people, vulnerable adults, adult members, guardians, families of Group members, trustees, employees, leaders and volunteers including Emergency Contacts. There is also information held on persons hiring the premises, leasing a space and partnership organisations.

This policy will work alongside the Privacy Notices to ensure compliance under General Data Protection Regulation (Regulation (EU) 201/679 (GDPR) and Data Protection Act 2018.

Definitions

"Personal data" is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

"Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

"Consent" means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify their agreement to the processing of personal data relating to them.

"Data protection legislation" means the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other applicable primary or secondary legislation as may be in force in the UK from time to time.

This information is used to meet individual members' needs, for attendance records, contractual agreements and emergency contacts. We store all records in a locked cabinet or on the office computer with files that are password protected in line with data protection principles. Any information alongside the Privacy Notice to ensure compliance under General Data Protection Regulation (Regulation (EU) 201/679 (GDPR) and Data Protection Act 2018.

Procedures

Trustees, employees, leaders and volunteers information

- All information and records relating to trustees, employees, leaders and volunteers will be kept confidentially in a locked cabinet or on a password protected computer.
- Individuals listed may request to see their own personal information at any time.

Other's information

It is our intention to respect the privacy of young people, vulnerable adults, adult members, guardians, families of group members including Emergency Contact along with leasing and contractors by:

- Storing confidential records in a locked filing cabinet or on the office computer with files that are password protected;
- Compliance with the Confidentiality Policy and that information held is not shared with friends and family

Lawful Basis

Chichester Boys' Club complies with and is aware of the six lawful bases in relation to collection and use of Personal Information

- consent;
- contract;
- legal obligation;
- vital interests;
- public task; and
- legitimate interests.

Personal data breach

If any personal data that you're responsible for has been lost, accidentally destroyed, altered without proper permission, damaged or disclosed to someone it shouldn't have been, this could be a personal data breach.

The scope of the breach and how you handle it could have serious consequences for the people who are identifiable in the data. In some cases, personal data breaches – once discovered – have to be reported to the ICO within 72 hours.

In the event that a report is made to the ICO, the Chairman of the Trustees should be informed.

As a data subject, individuals have a number of rights in relation to their personal data.

Subject access requests

Individuals have the right to make a subject access request. If an individual makes a subject access request, Chichester Boys' Club will inform them:

- whether or not their data is processed and if so why, the categories of personal data concerned and the source of the data, if it is not collected from the individual;
- to whom their data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long their personal data is stored (or how that period is decided);
- their rights to rectification or erasure of data, or to restrict or object to processing;

- their right to complain to the Information Commissioner if they feel Chichester Boys' Club has failed to comply with their data protection rights; and
- whether or not Chichester Boys' Club carries out automated decision-making and the logic involved in any such decision-making.

Training

Training will be provided to employees, leaders and volunteers in relation to GDPR and Data Protection dependant on their role.

Individuals whose roles require regular access to personal data will be required to complete GDPR Training on an annual basis.

Policy Date: 5 February 2025

Review Date: February 2026

Signed by Chairman of the Trustees:

A handwritten signature in black ink, appearing to be 'MARTIN', with a long horizontal line extending to the right.