

## **Overview**

To complete GDPR Compliance we adapted the documents and guidance notes outlined from the ICO website as well as a template toolkit and advice supplied by Sports UK.

Whilst we have no appointed Data Protection Officer we are supported by an IT consultant whose role is to assist us with Data Confidentiality, security and data redundancy (backup).

Anthony Maguire - Director and Juliana McGowran – Administrator, are designated data controllers and contacts for Privacy concerns. A designated email address is monitored specifically for any concerns.

Our internal staff Data Protection Policy was updated May 2018 and extended to workers, volunteers and consultants.

Our Privacy and cookie Policy was updated May 2018 and West Midlands Sports Development employees received relevant GDPR Training on both their individual rights as well as rights of our service users.

Our current provision falls under under 2 categories:

- On site After School Provision – Where sports activities are provided on an opt-in basis administered by parent. This is managed by our public website.
- PPA Provision – Where Sports coaching is provided within School time and administered by the school. This is managed by our company intranet.

Both these provisions our administrated through our Web Interface which benefits from SSL encryption and Secure Cloud based Hosting in an ISO27001 environment

## **On site After School Provision**

### **Web**

our public website processes booking requests from parents or guardians. This Booking process considers GDPR by including links to our updated privacy and cookie notice and a management option which allows a user to request deletion of personal data. The Booking system manages a log of consents granted and withdrawn for audit purposes. We do not intend to collect or knowingly collect information from children. We do not knowingly target children with our services.

### **Marketing materials**

A reducing number of Parents opt to complete our paper based leaflet application. This now also refers to our privacy notices as these paper applications are added manually to our booking system by a West Midlands Development Administrator.

### **Use of Photographs**

Explicit consent rather than implied consent is now used in relation to photographic materials. Course attendees and guardians are made aware we often take photos

and videos during the course. They are further made aware that no material will be used without their consent and confirmation of how it will be used.

### **PPA provision.**

How data is processed

- A list of students is supplied by the school in XLS format with the following personal identifiers.
  - Name
  - Class year registration
- The list is uploaded to our encrypted company intranet site by our Administrator where **Access Control** restricts who has access to this data. Only staff allocated to delivering and monitoring the session have access to the student records.
- The records are accessed by appointed coaching staff using TWO FACTOR authorisation.
- Access is for the purpose of measuring attendance as well as updating an individual activity report card. Coaching staff are asked to complete an online questionnaire on each child that reports evidence of successful completions of sports curriculum based tasks during sessions.
- Coaching staff access is time bound for the duration of the session/course or task.
- An appraisal of involvement report is collated and sent in digital encrypted format or hard copy where preferred.
- The data is kept for the term of the project and then is removed.

Staff are trained not to store any data on personal devices and download from the intranet is only active for Data Controllers.

### **Exception\***

**On first visits to a class or session we may include a printed names list to New Coaches to assist with early engagement. This is provided to the coach with the acknowledgment that it will be returned at the end of the session along with timesheets where it is shredded.**

Our Company Policies are displayed on our website with a prominent link to the privacy policy.