

ICC Data Retention Policy

This Data Retention Policy sets out the length of time that data will be retained by the Inverness Canoe Club (ICC), in line with the General Data Protection Regulations (GDPR) which came into force on 25th May 2018.

Different types of data are kept for different periods of time depending on the nature of the data and the need to maintain records in order to comply with legislation, requirements to report to government and other relevant authorities and the needs of the organisation to effectively administer paddlesport.

This policy mirrors that of the sport's governing body, the Scottish Canoe Association (SCA), with whom the ICC deposits certain information and which will act as the repository in accordance with this data retention policy. Certain categories of data are not currently held by the ICC at the time of adoption, but the policy sets out the retention arrangements that will apply should such data be held in the future.

The specific periods for which data will be kept are set out in the Appendix 1 to this policy, However, the general principles applied are that, where:

- An individual is a member of the ICC, data will be kept for 6 years.
- An individual has any training or qualifications, the data about that individual including the training they have completed and/or qualifications they have been awarded, will be kept permanently by the SCA. The reason for permanent record holding in relation to awards is that the SCA, as the British Canoeing Delivery Centre in Scotland for paddlesport awards, has a duty to keep track of what qualifications have been awarded in order to be able to confirm (or otherwise) that a specific qualification has been awarded to a particular individual.
- There is a legal responsibility to keep company records (including financial and HR records) and these will be kept in line with the legislation currently in force.
- Sufficient records need to be kept to provide evidence for insurance purposes in the event of any claims that might arise. Due to the fact that those under the age of 18 have additional time in which to make an insurance claim (3 years after the point at which they reach the age of 18 under the Limitation Act 1980), records concerning incidents that could give rise to an insurance claim will be kept for an appropriate period of time, and thus may be kept for up to 21 (i.e. 18+3) years.
- There is justification to keep data relating to event/competition results and winners of e.g. ICC Annual Awards as part of the organisation's heritage and development over time.

Please see Appendix 1 for a full list of the data which will be stored and the relevant period of retention.

Destruction of data will take place a minimum of once per year after the periods set out in Appendix 1 have been reached.

Appendix 1 –

Data Retention Schedule

- This list, while not necessarily exhaustive, reflects the categories identified by the SCA, and thus includes types of record not currently held by the ICC
- The shading indicates records not currently held by the ICC (as of May 2020), but which may be held in the future.

Area	Data/Document	Retention Period
Membership	Membership records	6 years (through SCA)
Correspondence	Membership correspondence	6 years
Events	Risk assessments and Safety Management Plan	6 years for Board documents (Individual Activity Assessments for trips: these are documents created and retained by the coach or leader but good practice is to retain for 1 year)
Events	Event entries	1 year
Events	Event attendance and declarations	21 years
Events	Event results sheets	Permanently
Training and Qualifications	Training, Qualification and Roles records	Permanently (through SCA)
Finance	Accounting documents and records	7 years
Governance	Board minutes	Permanently
Governance	List of board members	Permanently
Governance	Committee minutes	Permanently
Governance	List of committee members	Permanently
Governance	Declarations of interest	Permanently
Governance	Risk Register	Permanently
Governance	Health & Safety records	Permanently
Governance	Organisation charts	Permanently
Statutory reporting	Annual Report	Permanently
Statutory reporting	Annual Accounts	Permanently
Correspondence	Access correspondence	6 years
Correspondence	General correspondence	6 years
Historic records	Club award winners	Permanently
Complaints & Investigations	Complaints received and investigations carried out	5 years
Complaints & Investigations	Grievances and hearings	5 years

HR	Staff personnel records	6 years after employment ceases
HR	Staff appraisal record	6 years after employment ceases
HR	Payroll records	6 years after employment ceases
HR	Pension records	6 years after employment ceases
HR	Employee benefit records	6 years after employment ceases
HR	Accident reports	6 years after last entry or end of investigation if later
HR	Wages and salary records	6 years plus the current year
HR	Overtime records/authorisation	6 years plus the current year
HR	Expense accounts/records	6 years plus the current year
HR	Statutory Maternity Pay records, calculations or other medical evidence	3 years after the end of the tax year in which maternity period ends
HR	Sickness records	3 years after the end of each tax year for Statutory Sick Pay purposes
HR	Applications for jobs - where the candidate is unsuccessful	6 months after notifying unsuccessful candidate
HR	Redundancy details, calculations of payments, refunds	6 years after employment ceases
Insurance	Policy documents	6 years after lapse (currently part of British Canoeing Insurance and held by them)
Insurance	Claims correspondence	3 years after settlement
Insurance	Employer's Liability insurance certificates	40 years (currently part of British Canoeing Insurance and held by them)
Insurance	Incident Reports that could give rise to an insurance claim	3 years after the point at which all those named in the incident report have reached the age of 18
Buildings, plant and engineering	Deeds of title	Permanently or 6 years after disposal
Buildings, plant and engineering	Leases	15 years after expiry
Buildings, plant and engineering	Plans of buildings, planning consents, building certifications	Permanently or until 6 years after property is disposed of
Performance	Data associated with each athlete	Until athlete retires from performance sport - then data anonymised
Performance	Medical records	Until athlete leaves the programme
Performance	Driving licence copies for minibus drivers	3 years

ICC Privacy Notice

The Inverness Canoe Club (ICC) will be a “controller” of the personal information that you provide to us online, over the phone and through paper forms.

The ICC currently uses a third-party online system called WebCollect, provided by Open Brackets Limited, in order to process membership applications, event bookings and maintain records of training courses and other club activities. Members have their own log-in in order to access their personal information stored in WebCollect, and a shared log-in for access to the ICC Members Area of the website. The ICC is also affiliated to the sport’s governing body, the Scottish Canoe Association (SCA): this provides important benefits to ICC members and the sharing of information between the two bodies is subject to a [data sharing agreement](#).

When you register as a member of the ICC or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

- contact details – name, address, email address, emergency contacts (for children under 18, we will also require the email address of a parent or legal guardian)
- date of birth
- membership category – e.g. Adult, Junior
- payment details – e.g. bank account number, sort code, card details if paying by direct debit or payment card
- details of any membership of the SCA
- training or qualifications you hold relevant to paddlesport

We currently do not ask you for equality information other than gender – but reserve the right to do so, including disability (if any), ethnic group, religious belief, sexual orientation.

When you take part in an event (conference, training course, assessment, competition or other event) organised by the ICC, or organised by a third party and processed by the ICC, we may ask you for the following personal information:

- contact details – name, address, phone numbers, email address (for children under 18, we will also require the email address of a parent or legal guardian)
- date of birth
- details of the course being undertaken and training/qualification to be certificated
- if booking directly; payment details – card details;
- gender identity
- emergency contact details (name and phone number) and
- we will ask you about medical conditions (either on application or on the day) and dietary requirements (if appropriate). We also may need to ask you about dormitory arrangements.

In addition, members are required to carry Paddler information cards in triplicate at any Club paddling event. One copy should be in their boat, one on their person and one surrendered to trip leaders when requested for the duration of the event. Collection of cards at the end of an event is the participants’ responsibility. If a member fails to collect their card, they are deemed to have consented for their card and its associated data to be held so that it can be returned as soon as conveniently possible, or for it to be destroyed by the trip leader if it is not possible to return it in a timely manner.

When you volunteer (including as a Board member), we may ask you for the following personal information:

- contact details – name, address, email address
- date of birth
- training or qualifications you hold relevant to paddlesport
- equality information – disability (if any), ethnic group, religious belief, gender identity, sexual orientation
- Declaration of interests (for ICC Board Members).

When you join the ICC, as an affiliated Body to the SCA, we will provide the SCA with the following personal information:

- contact details – name, address, email address
- date of birth
- gender identity

Why we need your personal information – contractual purposes

We need to collect your personal information so that we can manage your membership. We will use your personal information to:

- set up your online membership account
- provide you with core member services via post and email, including membership renewal information, coaching and training information and opportunities; periodic members' news and information about General Meetings
- provide you with details of forthcoming activities, events and competitions (as well as those of selected third parties (including our partner organisations, other clubs and the SCA). Information about general services and benefits provided by third parties is optional and members opt into this on joining
- review, develop and improve the services and activities offered by us
- research, develop and manage new and existing programmes and projects
- monitor ICC compliance with equal opportunities legislation and any standards adopted relevant to the ICC, and to promote/maintain equality of opportunity or treatment
- support the activities of the SCA as the national governing body to promote paddlesport
- for statistical analysis.

We need to collect your personal information so that we can manage events (including courses) in which you participate and any qualifications or awards that you gain through your participation. We will use participant/athlete personal information to:

- administer the event
- process event results and, where applicable, send you confirmation of completion and/or certification
- maintain a record of qualifications in order to confirm suitability to participate in activities.

We may use volunteers' personal information so that we can manage voluntary effort. We will use this to:

- Maintain records of training and qualifications
- Allocate appropriate roles to volunteers based on their qualifications.

We need to pass personal information to the SCA to maintain records of club membership and for insurance purposes. This is a condition of our affiliation to the SCA. In addition, the SCA will use personal information provided by us to:

- support the ICC in managing membership information (notably through its documentation system)

- monitor compliance with equal opportunities legislation and the Equality Standard For Sport and to promote/maintain quality of opportunity or treatment
- for statistical analysis.

If you do not provide us with all of the personal information that we need then this may affect our ability to provide the above services and we may not be able to accept your membership of the Club.

Why we need your personal information – legitimate purposes

We need to collect your personal information so that we can manage your membership. We will use your personal information to:

- promote and encourage participation in paddlesport by sending communications to individuals and members and booking information for upcoming competitions, courses and other events
- for promotional, education and development purposes, including images captured at our events. We will try and meet any reasonable requests for images of individuals not to be used (The Club is not responsible for members who take photographs unofficially or their subsequent publication)
- provide paddlesport events by accepting and managing entries and checking your personal information to ensure you are entered into the correct category
- develop paddlesport by monitoring member engagement and involvement through inviting our members to participate in surveys for research and development purposes
- develop and maintain records of member training and qualifications, including sending email communications to individuals and members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG/child protection requirements
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to paddlesport
- administer PVG processing as necessary
- assist in developing new programmes for the strategic development of the sport and the ICC
- retain personal data for historical and statistical purposes, such as competition results and qualifications.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

When you book a place with us for a course or other event we need to collect your personal information so that we can process your booking and enable you to participate in the event, etc.

For some volunteer roles, we will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme. We will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or protected adults. You also may be required to provide references for certain voluntary roles (e.g. new coach/leader). These are held in paper format in a locked cabinet by the ICC Child Protection Officer.

The ICC shares personal information about club members with the SCA in pursuit of our joint legitimate interests to promote and develop paddlesport in Scotland. We also share information with High Life Highland for those coaches assisting at pool sessions. We supply a list of those who regularly coach at the pool and, for those coaching young people, the date of issue and number of their PVG certificate. This will result in reporting in aggregate and anonymised form to Sportscotland and the Scottish Government where appropriate.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to [members/participants/athletes/volunteers/club members] for the purposes of complying with our obligations:

- as a Scottish Charitable Incorporated Organisation (SCIO)
- under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults
- to assist the SCA, to whom we are affiliated, report on Sportscotland regulatory requirements in relation to the number, achievements and profile of our members
- under the Equality Act 2010, which requires the Club and the SCA to process personal information, to make reasonable adjustments where necessary.

Why we need your personal information – equality monitoring requirements

We may be required to use member and participant personal information relating to disability, ethnic group, religious belief, gender identity, age and sexual orientation for equality monitoring purposes as required by Sportscotland, the SCA or other funder. We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes, e.g. to display a list of coaches able to deliver a particular training or qualification course.

We provide the SCA with personal information that we collect. Where we do this, the SCA has a responsibility as a “controller” to provide the individual with a privacy notice and not use such personal information for any other purpose than those outlined above.

With whom we share your personal information:

If your personal information is included in any images or videos taken by us at our events, we may use this on our website, in publicity material and share this with the SCA and Sportscotland for promotional and/or journalistic purposes.

The ICC uses an online system called WebCollect provided by Open Brackets Limited to administer our membership database and club management system, as part of which Open Brackets Limited contracts third party payment providers to process your payments on our behalf. Open Brackets Limited and its payment providers process member personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and to protect it.

As a club affiliated to the SCA, the ICC shares your personal information with the SCA for the purposes set out above. This will include name, address, date of birth, gender identity, contact information, qualification and credentials.

- Individual ICC members, as an SCA Affiliated Club, benefit from Civil Liability Insurance provided by third party insurance arranged through the SCA. Where an insurance claim is made or notification of a possible claim received, we will pass personal data relating to the potential/actual claim to the SCA's insurers for the purpose of administering the claim
- We may need to share personal data with third party organisations, such as Sportscotland, for audit and reporting purposes
- If you are a coach, or complete any coach education course, the SCA will also share your personal information (name, address, date of birth, sex, email address and qualification details) with British Canoeing in order to process your qualification certification. If you move to/from Scotland and England, Wales or Northern Ireland the SCA will share your details (including qualifications) with the relevant UK canoeing membership association (i.e. British Canoeing, Canoe Wales and the Canoe Association of Northern Ireland)
- We may publish the results of our events on our website. This will include participants' name, age/age category and result
- Club member data will be aggregated and anonymised and will be used to demonstrate the participation trends in paddlesport. This anonymised data will not identify individuals.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include Disclosure Scotland and Police Scotland for the purposes of safeguarding children and vulnerable adults.

We may also share personal information with professional and legal advisors for the purposes of taking advice.

The ICC employs third party suppliers to provide a range of services. These suppliers may process personal information on our behalf as "processors" and are subject to contractual conditions to only process that personal information under our instructions and to protect it. In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

How we protect your personal information

Your personal information is stored on the electronic filing system maintained by WebCollect, whose servers are based in the UK and Europe, and is accessed by our staff and volunteers for the purposes set out above. Only the officers of the Club and the membership secretary have access to the full database. Any child and vulnerable adult protection information is stored separately in paper form in locked, secure storage by the Club's Child Protection Officer; full PVG (Protection of Vulnerable Groups) data is held by the SCA, who initiate disclosure checks on behalf of the Club and the ICC does not have access to these.

How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with membership services, meet our legal obligations and as required for other legitimate purposes. This is set out in full in our data retention policy.

Your rights

You can exercise any of the following rights by writing to the Membership Secretary, membership@invernesscc.org.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information
- you have a right to request that we restrict the processing of your personal information for specific purposes
- if you wish us to delete your personal information, you may request that we do so. Any requests received by ICC will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk.

ICC Data Protection Policy

Introduction

Inverness Canoe Club's data protection policy mirrors that of the Scottish Canoe Association (SCA), as our governing body, amended as appropriate.

As individuals, we want to know that personal information about ourselves is handled properly, and we and others have specific rights in this regard. In the course of its activities, the Inverness Canoe Club (ICC) will collect, store and process personal information, and it recognises that the correct and lawful treatment of this information will maintain confidence in the organisation and will provide for successful operations.

The types of personal information that ICC may be required to handle includes information about:

- members and, where applicable, their guardians;
- current, past and prospective employees, officers, board and committee members, volunteers;
- ICC representatives, advisers, consultants, contractors and agents;
- those individuals who have undertaken training or qualifications through ICC or partner organisations;
- coaches and course providers registered with the ICC;
- suppliers and sponsors; and
- others with whom it communicates.

This personal information, which may be held on paper or on a computer or other media, is subject to certain legal safeguards.

2. Status of the Policy

This policy sets out the ICC's policy on data protection and specifies how the ICC will comply with the current legislation regarding the receiving, storage, processing, retention and disposal of personal information.

This policy applies to all those who process data within the ICC. For any employees, it is a condition of employment.

Any breach of the policy will be taken seriously and may result in disciplinary action. Negligent or deliberate breaches could also result in personal criminal liability.

Any employee, board or committee member, volunteer, ICC representative, adviser, consultant, contractor or agent who considers that the policy has not been followed in respect of personal information about themselves or others should raise the matter with the ICC Data Protection Officer in the first instance.

3. The meaning of Data Protection Terms

Personal data means any information relating to an identified or identifiable natural person (a data subject), for example, name, address, date of birth or email address of members, athletes, coaches, participants, employees, volunteers or parents

Processing means any operation performed on personal data (including automated operations), including collecting, storing, consulting, using, disclosing, amending, deleting, etc.

for example, asking individuals to complete a form online, inputting their information into a database, sending communications, etc.

Special categories of personal data refers to data revealing a natural person's:

- Racial or ethnic origin
- Political opinions, religious or philosophical beliefs
- Trade union membership

- Genetic or biometric data for the purpose of uniquely identifying a natural person
- Data concerning health
- Data concerning a person's sex life or sexual orientation

Controller means the person or organisation who determines the purposes and means of processing personal data - generally this is the ICC. Where an organisation is required by law to process personal data, it must retain controller responsibility. The SCA is the controller for PVG data and the ICC does not have full accesses to disclosure checks.

Processor means the person who processes personal data on behalf of the controller. For example, any suppliers who administer any systems for the Club and/or the SCA – such as IT/other service providers.

4. Data Protection Principles

Anyone processing personal data must comply with the eight principles of good practice. These provide that personal data must be:

1. Processed fairly and lawfully
2. Processed for limited purposes and in an appropriate way
3. Adequate, relevant and not excessive for the purpose
4. Accurate
5. Not kept longer than necessary for the purpose
6. Processed in line with the data subjects' rights
7. Secure
8. Not transferred to people or organisations situated in countries without adequate protection

5. Dealing with Subject Access Requests

Data subjects can raise a **Subject Access Request** in respect of data that an organisation holds concerning them. The GDPR allows a month to comply with this request and there is normally no charge, although there is a right to refuse or charge for requests that are manifestly unfounded or excessive.

Data subjects can request information to be supplied electronically in a commonly used format rather than in printed form.

If a request is refused the individual must be told the reason for refusal.

6. Dealing with requests to be forgotten

Under the GDPR, subject to certain conditions being met, an individual has the right to have their data erased. If such a request is received from an individual, the ICC as the Data Controller, must assess the request in the context of the personal data that is held and the needs that exist to retain data including legal, commercial, contractual and other factors. In some circumstances, whilst it will be possible to erase some data, it may not be possible to erase all data about an individual due to these considerations.

7. Dealing with breaches of personal data

Under the GDPR, the ICC, as a Data Controller, is under obligation to maintain a breach register where all data breaches, no matter how trivial, are recorded and monitored.

For serious data breaches, where the breach is likely to result in a 'risk to the rights and freedoms of individuals', the breach must be reported to the Information Commissioners Office (ICO) within 72 hours of becoming aware of the breach and the data subject notified without undue delay.

If a volunteer or employee becomes aware of a loss of personal data or a potential breach of security of data they have a legal responsibility to report this to the ICC Data Protection Officer immediately, preferably by email. The volunteer/employee should try to get the data back:

- If they have e.g. sent data in error via email they should contact the recipient and request deletion/safe return of the data
- If they have e.g. mislaid paper/documents containing personal data they should retrace their steps and do what they can to recover the missing documents
- If they suspect that someone has accessed data through unauthorised access to an electronic device (computer/tablet/smartphone/online system) they should pass as much information to the ICC Data Protection Officer as possible
- If an electronic device (computer/tablet/smartphone) has been stolen this should be reported to the Police, as well as to the ICC Data Protection Officer

The ICC Data Protection Officer will:

- Log the breach in the ICC Data Breach Register
- Investigate the circumstances that gave rise to the breach
- Quantify the data that has been breached and the likely impact of the breach
- Ensure the ICO is notified of the breach within 72 hours (as required by law), in consultation with the Chairperson (see below)
- Consider if there is a need to involve the SCA as governing body and controller of PVG data.

Where there is “a high risk to the rights and freedoms of individuals”, the ICO will notify the data subject(s) concerned without undue delay, investigate how the breach occurred and review/revise procedures and/or arrange additional training in order to reduce the risk of future data breaches. Unless otherwise agreed by the ICC Board, communications with the ICO shall be within the responsibilities of the Chairperson of the Board.

8. Complaints

Any complaints arising concerning the ICC’s handling of data should be raised by contacting the ICC Data Protection Officer in the first instance.

9. General

This policy will be reviewed annually or more frequently should circumstances require in order to maintain its currency and relevance with periodic reports to the ICC Board on the implementation and operation of the policy.

Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with the ICC Data Protection Officer.