

## **Dennis and Dyer Data Protection Policy**

This document outlines the Data Protection Policy for the Dennis and Dyer Boxing Academy. The Academy uses certain types of personal information about staff, members, parents / carers and other individuals who come in contact within the gym, in order that we may provide education, competitions and associated functions. In addition, it may be required by law to collect and use certain types of information to comply with statutory obligations of Local Authorities (LAs), Government agencies and other bodies. This policy is intended to ensure that personal information must be dealt with properly and securely and in accordance with the Data Protection Act 2018 and other related legislation. It will apply to information regardless of the way it is used, recorded and stored and whether it is held in paper files or electronically.

### **Data protection act**

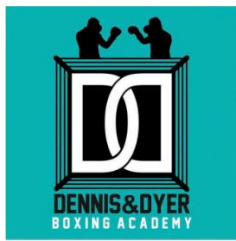
There are 8 Data Protection Principles as laid down in the 2018 Data Protection Act which must be followed at all times, unless an exemption applies:

- Data must be processed fairly, lawfully and may only be used for the specific purposes for which it was collected;
- Personal data shall be obtained only for one or more specific and lawful purposes;
- Personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed;
- Personal data shall be accurate and where necessary kept up to date;
- Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose;
- Personal data shall be processed in accordance with the rights of data subjects under the 2018 Data Protection Act;
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. These include technical measures (such as firewalls) and organisational measures (such as staff training);
- Personal data shall not be transferred to a country outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **Policy statement**

The Dennis and Dyer Boxing Academy is committed to maintaining the 8 principles outlined above. This means that the Academy will:

- Obtain consent if required for the processing of personal data (please note that consent may not be required if the processing is necessary for the Trust to undertake its obligations to students, and



their parents / carers: for example under a contract, or to protect students or others from harm, to fulfil the lawful and legitimate interests of the Trust, or because of some right or obligation conferred on the Trust by law);

- If information is shared we will (except in occasional circumstances where it is lawful and appropriate not to do so) explain to those concerned why, with whom and under what circumstances;
- We will check the quality and accuracy of the information we hold;
- Apply our Confidentiality and Information Security procedures to ensure that information is securely maintained;
- Review the data we hold at regular intervals to ensure personal information is not held longer than is necessary;
- Ensure that when information is properly authorised for disposal this is done securely;
- Ensure appropriate security measures to safeguard personal information whether that is held in paper files or on our computer system;
- We will share personal information with others when it is necessary and legally appropriate to do so;
- Train our staff so that they are aware of our policies and procedures;
- This policy will be updated as necessary to reflect best practice or amendments made to the Data Protection Act 2018 and subsequent legislation or regulation.

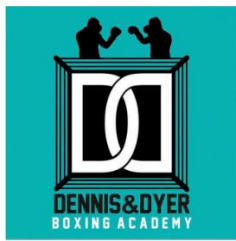
### **Sensitive and Personal Data**

Dennis and Dyer Boxing Academy, from time to time, be required to process sensitive personal data about staff and members. Sensitive personal data includes medical information and data relating to religion, race, trade union membership and criminal records and proceedings. Where sensitive personal data is processed by the Academy, the explicit consent of the subject will generally be required but there are circumstances where it is not: for example, where necessary to protect the vital interests of individuals, or where required by law (including in the context of employment) or by a statutory authority.

### **Data Protection at the Academy**

#### **Data Accuracy:**

Data held will be as accurate and up to date as is reasonably possible. If a data subject informs the Academy of a change of circumstances their records will be updated as soon as is practicable. Where a data subject challenges the accuracy of their data, the Academy will immediately mark the record as potentially inaccurate and until resolved the marker will remain and all disclosures of the affected information will contain both versions of the information.



### **Data adequacy and relevance:**

Data held about people will be adequate, relevant and not excessive in relation to the purpose for which the data is being held. In order to ensure compliance with this principle, the Academy will check records regularly for missing, irrelevant or seemingly excessive information and may contact data subjects to verify certain items of data.

### **Authorised disclosures:**

The Academy will, in general, only disclose data about individuals with their consent. However there are circumstances under which it may need to disclose personal data – even sensitive personal data – without explicit consent for that occasion. These circumstances are generally limited to:

- Student/member data disclosed to authorised recipients related to education and administration necessary for the school to perform its statutory duties and obligations;
- Student/member data disclosed to authorised recipients in respect of safeguarding (health, safety and welfare);
- Staff data disclosed to relevant authorities e.g. in respect of payroll and administrative matters; or where expressly requested by a relevant authority.

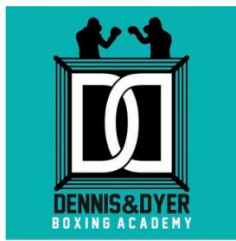
Only authorised and trained staff are allowed to make external disclosures of personal data and internal processing of personal data, in particular sensitive personal information, is handled by appropriate staff on a need-to-know basis. Data used within the Academy by administrative staff and coaches with which we work, will only be made available where the person requesting the information is a professional legitimately working within the Academy who need to know the information in order to do their work. The Academy will not disclose anything on students'/members records which would be likely to cause serious harm to their physical or mental health or that of anyone else – including anything which suggests that they are, or have been, either the subject of or at risk of child abuse. See Safeguarding Policy for further information.

### **Subject Access Request:**

Individuals have a right to make a 'subject access request' to request a copy of the personal information that we hold about them. SARs must be requested from the administrative team. SARs can also be made verbally or by letter or email.

Subject access requests must be submitted in writing, either by letter or by email. Requests should include:

- The user's name;
- A correspondence address;
- A contact number and email address;
- Details about the information requested.



The Academy will not reveal the following information in response to subject access requests:

- Information that might cause serious harm to the physical or mental health of the user or another individual;
- Information that would reveal that the child is at risk of abuse, where disclosure of that information would not be in the student/members best interests;
- Certain information given to a court in proceedings concerning the student/member.

Subject access requests for all or part of the student's educational record will be provided within 40 calendar days.

#### **Data and computer security:**

Physical security- Appropriate building security measures are in place, such as alarms, window locks and deadlocks. Only authorised persons are allowed in the network server room. Laptops and printouts are locked away securely when not in use. Visitors to the Academy are required to sign in at reception.

Electronic data security- Security software is installed on all computers containing personal data. Only authorised users are allowed access to the computer files that are password protected. Computer files are backed up daily to a central, secure server.

Procedural security - All staff are trained in their data protection obligations and their knowledge updated as necessary. Printouts as well as source documents containing confidential information are shredded before disposal. The Academy is liable as data controller for the acts of its staff, but individual members of staff should be aware they can be personally liable in law for security failures or wrongful disclosures including under the law of libel, confidentiality, or misuse of private information.

Disposal of Records -Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely. For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic records.

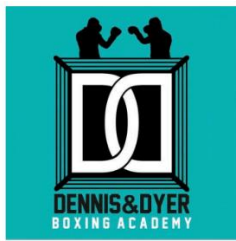
Data protection awareness is shared with all staff and they are aware of the data protection policy.

#### **The General Data Protection Regulation**

Dennis and Dyer Boxing Academy acknowledge that the law is changing on the rights of data subjects and that the General Data Protection Regulation is due to come into force in May 2018. We will review working practices when this new legislation takes effect and provide training to members of staff where appropriate.

#### **Complaints procedure**

Any complaints about this policy must be brought to the attention of club owners Marc Dennis or Liam Dyer. Complaints that are in the public interest and relate to suspected malpractice may be appropriate to raise under the Academy Whistleblowing Policy (See the Safeguarding Policy).



### **Compliance and Performance Monitoring**

The Academy will review this policy every two years and ensure that practice is in line with this policy. Any review will take into account the most up-to-date legislation and guidance.

The Trust has identified a range of Assurance Methodologies as tools by which compliance with policies can be tested. Those most relevant to this policy include:

- External Audit
- Internal Audit
- External Review (by others in the same field)
- Random testing by line managers

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