

RBI Wales Data Protection Policy

Policy Statement

RBI Wales is fully committed to compliance with data protection legislation, including the UK Data Protection Act (DPA) 2018 and the General Data Protection Regulation (GDPR).

RBI Wales takes its legal data protection obligations seriously and is committed to ensuring that privacy is a key consideration in all activity.

Scope

This Policy confirms RBI Wales' commitment to data protection. It applies to all members, coaches and volunteers of RBI Wales or anyone else processing Personal Data on behalf of RBI Wales.

All those to which this Policy applies must abide by its principles.

Data Protection Legislation

The DPA and GDPR provide a legal framework for all organisations processing 'Personal Data' and gives rights to those whose data is being processed. The legislation governs how Personal Data can be used by organisations and contains a set of principles which must be followed to ensure Personal Data is safeguarded and managed lawfully.

Personal Data is broadly any information that relates to an identified or identifiable individual i.e. information capable of identifying someone.

RBI Wales Data Protection Activity

RBI Wales collects and holds Personal Data relating to the following groups in particular:

- Members and/or staff of RBI Wales
- Coaches and Volunteers of RBI Wales
- Participants (and/or parents/guardians of participants) of RBI Wales organised events and activities
- Game officials

RBI Wales' Commitment and Obligations

RBI Wales fully endorses, and is committed to, adhering to the Data Protection Principles as listed below. When processing Personal Data, RBI Wales will ensure that it is:

- processed lawfully, fairly and in a transparent way;
- processed for a specific and legitimate purpose;
- limited to what is necessary, relevant and not excessive;

- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of the data subject for no longer than is necessary;
- processed in a manner that ensures security of that personal data;
- processed in a manner which enables RBI Wales to demonstrate, and take responsibility for, what is done with the data in its control.

These principles must be observed at all times by anyone processing Personal Data on behalf of RBI Wales.

Through appropriate management and strict application of criteria and controls, RBI Wales will:

- observe fully the conditions regarding having a lawful basis to process Personal Data;
- meet its legal obligations in providing individuals with information about how their data will be managed and the purposes for which it is being collected/used ('privacy notices');
- collect and process appropriate and relevant Personal Data only i.e., data that is necessary to fulfil operational needs or to comply with legal requirements;
- ensure the Personal Data held is accurate and up to date;
- ensure that the Personal Data is held for no longer than is necessary;
- ensure that the rights of people about whom information is held are respected and can be fully exercised under the Data Protection Act 2018 where they apply (i.e. the right to be informed that processing is being undertaken, to access personal information on request; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information);
- take appropriate technical and organisational security measures to safeguard Personal Data;
- ensure that Personal Data is not transferred outside the EU, to other countries or international organisations without an adequate level of protection.

Where RBI Wales holds sensitive data, which is defined by the legislation as 'Special Categories' of Personal Data, this data will only be processed with express consent from the individual to which the data relates unless RBI Wales has a specific legal duty to process such data. Examples of sensitive data include information about health, racial or ethnic origin, criminal convictions, or religious beliefs.

Data Security

RBI Wales is committed to data security and to safeguarding the integrity of the data it holds. RBI Wales will ensure that any Personal Data it holds is stored and managed responsibly and securely.

RBI Wales expects its Members, Coaches and Volunteers (or anyone processing Personal Data on its behalf) to ensure that any Personal Data they collect as part of RBI Wales business is:

- stored and managed securely (see 'storage and security expectations below');
- not disclosed orally, in writing, via web pages, or by any other means, accidentally or otherwise, to any unauthorised third party;

[RBI Wales Storage and Security Expectations](#)

Personal Data must be kept in a locked filing cabinet, drawer, or safe.

In respect of electronic data, this should be coded, encrypted, or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Travelling with Personal Data must be avoided where possible.

When travelling with a device containing Personal Data is unavoidable, both the device and data should be password protected. The device should be kept secure and remain with the custodian at all times. Where this is not possible, it should be stored securely/locked away out of sight.

Travelling with hard copies of Personal Data must be avoided, particularly where there is secure electronic storage available. When it is essential to travel with hard copies of Personal Data, it must be kept secure and out of sight and remain with the custodian at all times.

[Breaches of Data Protection Policy](#)

[Notification](#)

All alleged breaches of the Data Protection Policy must be reported to RBI Wales via the nominated contact (see last page of Policy). This notification obligation applies to all RBI Wales' Members, Coaches and Volunteers (or anyone processing Personal Data on its behalf).

[Examples](#)

The following are examples of data breaches:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a data controller or data processor;
- sending Personal Data to an incorrect recipient;
- computing devices containing Personal Data being lost or stolen;
- alteration of Personal Data without permission;
- loss of availability of Personal Data.

Investigation of Data Breaches

In the event that RBI Wales becomes aware of a breach, or a potential breach, an investigation will be carried out by an appointed representative. RBI Wales will take all breach notifications seriously and is committed to the prompt investigation of any alleged breach.

Where the breach is serious and/or is likely to pose a risk to people's rights and freedoms, RBI Wales will undertake to notify the Information Commissioner within 72 hours of discovery.

If RBI Wales is unable to report in full within this timescale, it will make an initial report to the Information Commissioner, and then provide a full report in more than one instalment if so required.

RBI Wales will undertake to notify the individual whose data is the subject of a breach if there is a high risk to people's rights and freedoms without undue delay and may, dependent on the circumstances, be made before the supervisory authority is notified.

A breach of this Policy including, but not limited to, unauthorised disclosure of Personal Data, may result in action under the Disciplinary Procedure.

Record of Breaches

RBI Wales will record all breaches regardless of whether they are notifiable to the Information Commissioner or not as part of its general accountability requirement under the DPA 2018.

RBI Wales will record the facts relating to the breach, its effects and the remedial action taken.

Review of Policy

This Policy will be reviewed annually by the RBI Wales Board, or more frequently if deemed necessary by the Board. The current version of this Policy (v1.0) was created and reviewed in December 2020.

Questions or concerns

Questions or concerns about data protection at RBI Wales, should be addressed to the nominated contact for this Policy below:

Name: TBD

Role within RBI Wales: Board Member/Director

Contact:

As an organisation, we commit to implementing this policy and addressing any concerns quickly and within these guidelines.