



DATA PROTECTION/ GDPR POLICY STATEMENT

Bredagh GAC is committed to ensuring that any information gathered in relation to our youth academies meets the specific responsibilities as set out in the Data Protection Act 1998 and The General Data Protection Regulation (GDPR) 2018.

What is Data Protection?

Data Protection legislation is intended to protect the right to privacy of individuals and seeks to ensure that Personal Information is used appropriately by organisations that may have it (Data Controllers/Data Processors). Data Protection relates to any information that can be used to identify a living person such as:

Name Date of Birth Address Phone Number Email address Membership Number IP Address Photographs or video clips etc There are other categories of information defined as Special Categories of Personal Data which require more stringent measures of protection and these include: Racial or ethnic origin Political opinions Religious or philosophical beliefs Trade union membership Processing of genetic data Biometric data for the purpose of uniquely identifying a natural person Data concerning health Data concerning a natural person's sex life or sexual orientation. Children's data and data relating to criminal convictions or offences also require more stringent levels of protection.

What is GDPR?

The General Data Protection Regulation (GDPR) is new EU legislation that comes into effect on May 25th 2018. It very clearly sets out the ways in which the privacy rights of every EU citizen must be protected and the ways in which a person's 'Personal Data' can and can't be used. It places the onus on the person or entity that uses a person's information (Data Controller/Data Processor) to comply with the legislation and to demonstrate compliance. What does Data Protection Legislation mean for me? The legislation sets out rules about how this information (Personal Data) can be obtained, how it can be used and how it is stored. Personal data must be collected and processed for a specific purpose which must be communicated to



the individual at the time the data is obtained. Data must be kept safe and secure and must be kept accurate and up to date. An Individual can request a copy of all of the personal information held about them (this is called a Subject Access Request) and must be allowed to have all of their data deleted or returned to them, if they so wish.

Seven Principles of Good Data Protection

1. Lawfulness, Fairness, Transparency
2. Purpose Limitation (Use only for one or more specified purposes)
3. Data Minimisation (Collect only the amount of data required for the specified purpose(s))
4. Accuracy (Ensure data is kept up to date, accurate and complete)
5. Storage Limitation (Kept for no longer than necessary for the specified purpose(s))
6. Integrity and Confidentiality (Processed ensuring appropriate security of data)
7. Accountability (Essential not only to be compliant, but to be able to demonstrate compliance)

To achieve compliance Bredagh GAC have drawn up the following guidelines:

Awareness

GDPR will benefit all of us, it will ensure that our Personal Information is protected from misuse by any organisation. It will also ensure that, as a Data Controller, Bredagh GAC will be accountable for how it collects, uses and stores information about the GAA members under their remit. It is critically important that every member is aware of the changes that GDPR will bring and how that impacts them, either as a volunteer working on behalf of the club or as an individual Club Member. This awareness will also benefit all of us in our personal lives as GDPR also relates to Banks, Insurance Companies, Utility providers, On-line Marketing etc. Clubs should ensure that information relating to GDPR is made available to Committee Members, Club Members, Coaches, Volunteers or anyone who is in anyway involved with the Club. Information regarding Data Protection can be found on the GAA website:

<http://www.gaa.ie/dataprotection>.



Ensuring Compliance

It is imperative that every Bredagh GAC understands the principles of Data Protection and how the legislation affects them. The following are key steps the club taken.

All club members and volunteers will be made aware of why their data is being collected and who will have access to it, before their data is obtained. Under existing Data Protection law, it has always been a requirement to provide some of this information to individuals. GDPR builds on this requirement and expands the information that must be given to Individuals in advance of collecting and using their data.

Club membership forms, and other forms used to collect data (e.g. Garda Vetting) will specifically tell individuals the following:

- The Clubs identity
- The reasons for collecting the information
- The uses it will be put to
- Who it will be shared with (e.g. third parties)
- If it is going to be transferred outside the EU
- The legal basis for processing the information
- How long it will be retained for
- The right of members to complain if they are unhappy with the club's implementation of GDPR
- Other specific personal privacy rights relevant under GDPR

Designate responsibility

Bredagh GAC has a designated person to coordinate their approach to meeting their Data Protection obligations. Their tasks will include identifying and recording the specific locations where data is held in each club, ensuring that consent is obtained in the appropriate manner and maintained accordingly.

All Youth Development Officers and Youth Academies will use the same registration form to ensure consistency of information and that the child/guardian is made aware of why we require the information.



Personal Data Inventory

Bredagh GAC will make an inventory or record of processing activities of the personal data that it holds.

Third Parties

Bredagh GAC will ensure that all information processed by a third party is GDPR compliant. A contract or agreement relating to data protection responsibilities between the Club and the third party should be in place in order to demonstrate this compliance. A Controller and Processor should enter into a Data Processing Contract which must, at a minimum, contain the following details:

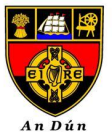
- The subject matter, duration, nature and purpose of the data processing;
- The type of personal data being processed;
- The categories of data subjects whose personal data is being processed;
- The obligations and rights of the Controller

Membership Forms

Bredagh GAC will ensure that all Membership Forms are GDPR compliant and contain a privacy notice which outlines the information which is required to be provided to individuals prior to the collection of their personal data together with appropriate consent mechanisms.

Consent

GDPR is very clear that an individual must be informed of what their personal information is going to be used for, who will have access to it, where it will be stored and how long it will be held for. In certain circumstances, they must give their consent for their data to be used. Consent must be 'freely given, specific, informed and unambiguous'. Consent cannot be bundled, i.e. "I consent to my information being used to notify me about my order and for marketing". Therefore, separate consent for each purpose must be obtained. Members cannot be forced into consent or unaware that they are giving consent. Obtaining consent requires a positive indication of agreement – it cannot be inferred through silence (not objecting), pre-ticked boxes or inactivity.



Consent must also be verifiable – Data Controllers must be able to demonstrate that consent was given and an audit trail should be maintained Note: Where paper forms are used to collect personal information (e.g. Membership applications), the retention period (how long its kept for) of the form, or relevant portion of the form, should align with the need to demonstrate consent. Consent is not deemed to be indefinite and should be refreshed at least every two years, therefore the retention period of the form should be maximum two years. If consent is refreshed every year (i.e. a new form signed every year) the retention period for forms should be one year.

The names and addresses of children and guardians are only gathered for the purpose of maintaining a record of those currently involved in the clubs youth section. We require this information in order to ensure that we are able to contact both children and young people in respect of notification of events and parents/guardians in cases of emergency. We also maintain a record of names and contact details in order to ensure a register of all involved in the club is up to date.

Data Breach – Process Overview

Identification

1. Bredagh GAC will actively monitor electronic and paper records to identify Data Breaches or potential Data Breaches.
2. Once a data breach, or potential data breach, is identified, it will immediately be recorded with as much information as possible (Date & Time of breach, Date & Time of identification, Data Involved, Number of Individuals impacted, description of breach and cause of breach, if known)
3. An individual may also raise a concern regarding a potential breach, this must be investigated
4. The GAA DPO should be informed immediately (dataprotection@gaa.ie)

Assessment

1. A risk assessment will be carried out to identify if there are risks to the Rights or Freedoms of the individual



2. If there is deemed to be no risk to the individual (if the data has been encrypted or is anonymised etc.) the reasons for this decision should be documented
3. The GAA DPO should be notified and the outcome recorded
4. If there is a risk to the individual(s), the reasons for this decision must be documented and the Office of the Data Protection Commissioner must be informed (within 72 hours of becoming aware of the breach)
5. If there is a high risk to the individual(s) the reasons for this decision must be documented, the Office of the Data Protection Commissioner must be informed (within 72 hours of becoming aware of the breach) and every individual involved must be informed without undue delay.

Notification

1. If the Office of the Data Protection Commissioner is being notified of a breach, due to a risk or high risk to the rights and freedoms of the individual, the following will be included:
 - a. Description of breach
 - b. Categories of data involved
 - c. Number of individuals involved
 - d. Description of likely consequences
 - e. Description of measures taken or proposed to be taken to mitigate the risks
 - f. Name and contact details of the Clubs

2. If the individual is being notified of a breach, due to a high risk to their rights and freedoms, the following will be included:
 - a. Clear and plain English description of breach
 - b. Description of likely consequences
 - c. Description of measures taken or proposed to be taken to mitigate the risks
 - d. Name and contact details of the Clubs Data Protection representative.



Investigation & Outcomes

1. If the Office of the Data Protection Commissioner is involved, they will conduct an investigation and instruct on the actions to be taken to resolve the matter
2. The outcome of this investigation will be communicated to the Club
3. The GAA Data Protection Officer should be informed of the outcome of this investigation
4. The club must take whatever actions instructed by the Data Protection Commissioner
5. The club must implement measures to ensure similar breaches cannot reoccur

Data Breach – Process Overview Data Breach Process

- That the information requested is relevant to the needs of the database and to ensure we adhere to good child protection practices.
- We will make every effort to ensure the information entered onto the database from paper records are accurate and kept up to date. The paper record will be stored in a secure place & to the same standards as the data base.
- Bredagh GAC will only keep a child's information on the database for 12 months at a time. Re-registration forms will be completed following this time. If a child leaves the club during this 12 months the information will be deleted after 4 weeks.
- Bredagh GAC will only keep a child's information on the database until the child either transfers to another club or reaches the age of 19 years, whichever comes first.
- The database will be password protected and will only be accessed by eligible staff members based at that club.
- Eligible club officers only will access the database.
- The database or any individual's name and address will not be forwarded to a third party without the prior permission of the child and guardian.



Club Database Guidelines

Details re Club Data Protection Information are provided on the back of the Club Registration Form.

The **Club Data Controller is The Club Registrar** and he can be contacted via e-mail: Secretary.bredagh.down@gaa.ie

The GAA Data Protection Officer can be contacted via e-mail: dataprotection@gaa.ie.

In respect of underage members, the Club adopts the National GAA Code of Behaviour (underage) which can be downloaded from the Club website and also the Club Child Safeguarding Statement.

The club complies with the requirements of the GDPR 2018 with regard to the collection, storage, processing and disclosure of personal information and it is committed to upholding the Act's core Data Protection Principles'. that personal information is:

- Obtained fairly and lawfully
- Processed for the purpose for which it is obtained
- Kept accurate and up to date
- Kept only for as long as is necessary
- Protected against unauthorised access

The club strives to ensure that it keeps a comprehensive data of all its members either on computer or otherwise. The club should ensure that it stores information on the following groups within the club:

Membership

Persons applying for membership of the Club complete a membership form the details of which are transcribed on to the GAA electronic membership database. The information on the membership forms and the electronic database allow the Club to:



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- a. Register players with the Down County Board the Down Ladies County Board and Down County Camogie Board.
- b. Provide up to date details of players at each age group to the appropriate Team Managers. This is essential for ensuring that:
 - only fully paid up members participate in training activities and represent the Club in organised matches
 - Managers have access to emergency contact information should the need arise
- c. Monitor and analyse overall membership levels and drop out rates. This helps the Club to evaluate its performance in retaining existing members and attracting new members
- d. Record the roles undertaken by individuals each year
- e. Record training undertaken by Club members.

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Non-Playing Members

The information that should be stored on all non-playing members is as follows:

- Names
- Address
- DOB
- Occupation/role
- Home Tel Number
- Work Tel Number
- Mobile Number
- Email address
- Special Medical Conditions



Players Members

There are separate tables set up for each of the different age groups within the club for both the male and female sections of the club (from U8 to Senior Level). This should be done for all codes player within the club (Male and Female Football, Hurling and Camogie).

This information that should be stored on all members is as follows:

- Names
- Address
- DOB
- School (if applicable)
- Occupation (if applicable)
- Home Tel Number
- Mobile Number
- Emergency Contact
- Email address
- Special Medical Conditions
- Previous Sports Injuries
- Parents/Guardian name (if underage)
- Coaching
- Consent for photographs

Club Officials

Information is stored on all club officials, both Executive Committee and all sub-committee members. The information stored is followed:

- Name
- Address
- DOB
- Occupation
- Role within club
- Home Tel Number
- Work Tel Number



- Mobile Number
- E mail address
- Special Medical Conditions
- Administration Courses Attended
- Training qualifications
- Child Protection Qualifications

Club Coaches

There is information stored on all coaches and volunteers, both actively coaching and no longer coaching within the club.

The information that should be stored on club coaches/volunteers is as follows:

- Name
- Address
- DOB
- Occupation/role
- Home Tel Number
- Work Tel Number
- Mobile Number
- Email address
- Special Medical Conditions
- Actively Coaching?
- Team Coached
- Coaching Qualifications and Dates Achieved.
- Ulster Council and CPD Qualifications
- Child Protection Qualifications
- First Aid Qualifications
- Other relevant qualifications (and dates)



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Signed: _____ Date: _____ Secretary

Signed: _____ Date: _____ Chairman



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