

Kingswood Sports CIO Confidentiality Policy

Policy Number: KS-CO-01

Effective Date: September 2024

Review Date: September 2025

Approved by: Board of Trustees

Version: 1.0

1. Purpose

This policy ensures that Kingswood Sports CIO (from now on referred to as "the Charity") complies with confidentiality laws and best practices, ensuring the suitable handling of personal, sensitive and confidential information relating to any individual or organisation who works with our charity.

2. Scope

This policy applies to all trustees, employees, volunteers, contractors, and other parties accessing or handling personal data on behalf of Kingswood Sports CIO.

3. Definitions

Personal Data: Any information relating to an identified or identifiable individual.

Processing: Any operation or set of operations performed on personal data, whether or not by automated means, including collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.

Data Subject: The individual whose personal data is being processed.

Data Controller: The organisation that determines the purposes and means of processing personal data.

Data Processor: The organisation that processes personal data on behalf of the data controller.

GDPR: General Data Protection Regulation, a regulation in EU law on data protection and privacy.

4. Policy Statement

- Kingswood Sports CIO is committed to collect and retain confidential data for justifiable reasons.

- It will only use the data for the purpose in which it was collected.
- Individuals will be informed about how their data will be used and the choices they have relating to this.
- Employees within the charity will only be given access to any confidential information when it is needed.
- Those who have access to personal and confidential information will be aware of their responsibilities relating to confidentiality.
- Confidential information given to the organisation will not be shared with any third party without an individual's or organisation's expressed permission, unless required by law,

5. Responsibilities

Board of Trustees:

- Ensure the implementation and review of this policy.
- Provide leadership and support for confidentiality initiatives.
- Ensure compliance with confidentiality legislation.

Employees and Volunteers:

- Follow Confidentiality policies and procedures.
- Report any breaches or concerns to the Charity Manager immediately.
- Participate in training as required.

6. Confidentiality Principles

- 1. Lawfulness, Fairness, and Transparency:**
 - Personal data will be processed lawfully, fairly, and transparently.
- 2. Purpose Limitation:**
 - Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in an incompatible manner.
- 3. Data Minimisation:**
 - Personal data will be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- 4. Accuracy:**
 - Personal data will be accurate and, where necessary, updated.
- 5. Storage Limitation:**
 - Personal data will be kept in a form that permits the identification of data subjects for no longer than is necessary.
- 6. Integrity and Confidentiality:**
 - Personal data will be processed to ensure appropriate security, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage.

7. Action to be taken

1. All trustees, employees, volunteers and any other individuals involved with the charity will receive a copy of the Confidentiality Policy as part of their induction.
2. All confidential data is stored in accordance with The Data Protection Act (2018). Data is secured against unauthorised access, accidental disclosure, loss or destruction.
3. Personal data is only accessible to those authorised to have access to this.
4. Electronic records are regularly monitored and information is destroyed when no longer necessary to keep it.
5. Electronic devices with confidential information are password-protected and stored securely.
6. The Charity recognised their responsibility to share confidential information in line with legislation when there is risk of danger to an individual, when it is in the public interest to do so (steps will be taken to gain consent if safe to do so), or where it is against the law to withhold it - here, information may be divulged to external agencies including the police, social services.
7. If a trustee, employee or volunteer feels that confidentiality has been breached, they will report the matter immediately to their line-manager. Should a line-manager feel that confidentiality has been breached, this will be reported to the lead trustee, with information relating to how confidentiality has been breached along with actions that have already been taken. Further action is taken as necessary and a written report is completed with full details of the event.

8. Data Subject Rights

1. **Right to Access:**
 - Data subjects have the right to access their data and obtain information about how it is being processed.
2. **Right to Rectification:**
 - Data subjects have the right to request the correction of inaccurate personal data.
3. **Right to Erasure:**
 - Data subjects have the right to request the deletion of their data in certain circumstances.
4. **Right to Restrict Processing:**
 - Data subjects have the right to request the restriction of processing their data in certain circumstances.
5. **Right to Data Portability:**
 - Data subjects have the right to receive their data in a structured, commonly used, and machine-readable format and to transmit it to another controller.
6. **Right to Object:**
 - Data subjects have the right to object to processing their data in certain circumstances.
7. **Rights Related to Automated Decision-Making:**

- Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

8. Data Security

1. Technical and Organisational Measures:

- Implement appropriate technical and organisational measures to ensure security appropriate to the risk.
- Regularly review and update security measures to protect against unauthorised access, data breaches, and other threats.

2. Data Breach Procedures:

- Establish procedures for identifying, reporting, and managing data breaches.
- Notify the ICO and affected data subjects promptly during a data breach.

9. Training and Awareness

- Train employees and volunteers regularly on data protection principles, policies, and procedures.
- Raise awareness about the importance of data protection and the role of individuals in safeguarding personal data.

10. Monitoring and Review

- The DPO will monitor compliance with this policy and report to the Board of Trustees.
- This policy will be reviewed annually to ensure its effectiveness and relevance.
- The review process will consider feedback from employees, volunteers, and data subjects.

11. Contact Information

For any queries or concerns regarding this policy, please contact:

Data Protection Officer:

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Chair of the Board of Trustees:

Sarah Weichardt
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Approved by:

Sarah Weichardt

Chair of the Board of Trustees

Kingswood United CIO

This policy ensures that Kingswood Sports CIO processes personal data lawfully, fairly, and transparently, safeguarding the rights and privacy of all stakeholders.