

BRITISH TAEKWONDO COUNCIL

Data Protection Policy

| Version | Author | Changes | Date | Next Review Date |
|---------|-----------------|--|----------|------------------|
| 2 | Trevor Nicholls | | May 2018 | May 2020 |
| 3 | Trevor Nicholls | Reformatted, Para 1, 2, 3.2, 3.3, 4.5 | May 2020 | May 2022 |
| 4 | T Humphries | Full review: reformatting and updates in Paras 3, 4, 6, 7 and 8 denoted by redline | Dec 2023 | Dec 2026 |

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1. General principles

This policy follows the seven principles of the General Data Protection Regulations 2018 which superseded the Data Protection Act 1998 (effective from 1st March 2000) and regulates how personal data about individuals can be held, stored and used. The responsible officer for issues in relation to Data Protection and confidentiality is the Lead Safeguarding Officer, who will also ensure that British Taekwondo Council (BTC) maintain the relevant ICO (Information Commissioner's Office) Licence.

2. Reference

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/>

3. Procedure

- 3.1 BTC will process individuals' personal data fairly and lawfully and ensure that appropriate measures are taken to protect against unauthorised or unlawful processing of personal data and against accidental loss of, or damage to, personal data.
- 3.2 In line with our legal obligations as laid down by the General Data Protection Regulation (GDPR) 2018, the BTC needs to keep information about officers and recognised Governing Body instructors. Information held includes contact data (names, addresses, email and telephone number) and accreditation information, including DBS/PVG Scheme Disclosure details.
- 3.3 The information held will be for BTC management and administrative use and to advise authorised and interested parties (eg schools, local authorities, venue providers, prospective members, parents and carers). BTC may, from time to time, need to disclose some information held about officers/registered instructors to relevant third parties (e.g. where legally obliged to do so by Inland Revenue, Police or when requested to do so by individuals for the purpose of giving a reference). BTC will advise the individual concerned about these requests, if permitted. The BTC recognise that officers and instructors/coaches use information about individuals and associations during the course of their work or activities. In most cases information will not be stated as confidential and it will be necessary to use common sense and discretion in deciding whether information is expected to be confidential. This policy aims to give guidance but if in doubt, seek advice from the BTC Lead Safeguarding Officer.
- 3.4 Officers and instructors/coaches are able to share information with their line manager where necessary to discuss issues and seek advice.
- 3.5 Officers and instructors/coaches should avoid exchanging personal information about individuals with whom they have a professional relationship.
- 3.6 It is not appropriate to discuss a person's sexuality without their prior consent.
- 3.7 Officers and instructors/coaches should avoid talking about member organisations or individuals in social settings.
- 3.8 Officers and instructors/coaches will not disclose to anyone, other than their line manager, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer, in the case of a member organisation.
- 3.9 If it is necessary to discuss difficult situations with each other to gain a wider perspective on how to approach a problem, the member organisation's consent must be sought before personal information enters into the discussion unless it is beyond doubt that the member organisation would not object to this. Alternatively, a discussion may take place with names or identifying information remaining confidential.
- 3.10 Where there is a legal duty on BTC to disclose information, the person to whom the confidentiality is owed will be informed that disclosure has been, or will be, made.

4. Why information is held

- 4.1 Most information held by BTC relates to member organisations or individuals which are in membership or fund them.
- 4.2 Information is kept to enable BTC to undertake all duties associated with its role as the National Governing Body for Taekwondo in the UK, including DBS/PVG/AccessNI Scheme information.
- 4.3 BTC has a role in putting people in touch with voluntary and community organisations and keeps contact details which are passed on to any enquirer, except where the member organisation expressly requests that the details remain confidential.
- 4.4 Information about students is given to the relevant member organisation and to no one else.
- 4.5 Information about ethnicity and disability of users is kept for the purposes of monitoring our Equity Policy and also for reporting back to funders. This data is normally anonymised.

5. Access to information

- 5.1 Information is confidential to BTC as an organisation and may be shared with member organisations to ensure the best quality service for members.
- 5.2 Where information is sensitive, i.e. it involves disputes or legal issues; it will be confidential to the officers dealing with the case. Such information should be clearly labelled 'Confidential' and should state the names of the officers entitled to access the information and the name of the individual or group who may request access to the information.
- 5.3 Officers, instructors/coaches and volunteers will not withhold information from their line manager unless it is purely personal.
- 5.4 Officers, instructors/coaches and volunteers may have sight of their personal records by giving 40 days' notice in writing to the Chair. BTC reserve the right to charge £10 for such requests.
- 5.5 When photocopying or working on confidential documents, staff/officers must ensure they are not accidentally seen by others. This also applies to information on computer screens.

6. Storing information

- 6.1 Whilst paper records are kept, general non-confidential information about associations will be kept in unlocked filing cabinets. Electronic files will be accessible to authorised BTC officers.
- 6.1 Whilst paper records are kept, information about volunteers, students and other individuals will be kept in lockable filing cabinets by the officer directly responsible. The use of passwords is required for such information held electronically. These officers must ensure line managers know how to gain access.
- 6.2 Officers and instructors'/coaches' personal information will be kept in accordance with DBS/PVG/AccessNI Scheme requirements, in lockable filing cabinets (whilst paper records are kept) or password-protected electronic files accessible only to authorised officers.

- 6.3 Whilst paper records are kept, files or filing cabinet drawers bearing confidential information should be labelled 'CONFIDENTIAL'. Electronic files must be password-protected.
- 6.4 In an emergency situation, the Chair or CEO may authorise access to files by other people with a legitimate reason.

7. Duty to disclose information

- 7.1 There is a legal duty to disclose some information including:
- Abuse of children or adults at risk will be reported to the relevant Social Services Department
 - Drug trafficking, money laundering, acts of terrorism or treason will be disclosed to the police
- 7.2 In addition, if officers or instructors/coaches believe that an illegal act has taken place, or that a member is at risk of harming themselves or others, they must report this to the BTC Welfare and Safety Lead, who will report it to the appropriate authorities. The police should be immediately informed if there is imminent danger to life.
- 7.3 Members should be informed of this disclosure.

8. Breach of confidentiality

- 8.1 Members who are dissatisfied with the conduct or actions of any officer, instructor/coach or volunteer of BTC should use the Complaints or Whistleblowing procedure as appropriate and not discuss their dissatisfaction outside the BTC.
- 8.2 Officers or instructors/coaches accessing unauthorised files or breaching confidentiality may face disciplinary action. Ex-officers, instructors/coaches or members breaching confidentiality may face legal action.