

Property of the British Aikido Board

**BAB - Association Data Handling
Guidelines for Data Protection**

Version 1.1

12 pages

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1 Preface

- 1.1 This document is designed to act as a guide to define the requirements needed in an Association Data Handling Document.
- 1.2 The intention of this guide is to look at the data paths within your own Association. Once you have identified these paths you may even want to simplify them or you may find areas you wish to change.
- 1.3 Once you have written your own procedure, please review it regularly to ensure it matches what happens in reality.

2 Introduction

2.1 Breakdown

2.1.1 This document details the life cycle of data held within this Association.

2.1.2 Throughout this document, reference will be made to the word *database*. This can be computer-based, a book or a simple filing cabinet or pack of papers.

2.1.3 There are five areas of importance. Each area has its own dedicated Section. These areas are:

- Membership
- Coaching
- The World Wide Web
- Data Security
- Access to Data

2.1.4 Data life cycles consist generally of four parts. Within each Section will be a section on each of these life cycle parts. These are

- Inception (1st contact, new person),
- Update / Expansion (renewal of data, changing grades, addresses etc),
- Archive
- Deletion

3 Membership

3.1 Inception

- 3.1.1 New members complete a membership form.
- 3.1.2 The data required by the British Aikido Board (BAB) is transferred to the BAB registration form and an insurance certificate issued by the relevant member of the Association.
- 3.1.3 The Database Administrator then transposes the data to the membership database. The Database Administrator keeps the original form securely.
- 3.1.4 Data is deemed to be accurate as the student completes the form him/herself and signs to authorise the use of the data.

3.2 Update / Expansion

- 3.2.1 Annual renewals take place. A new membership form is completed and any updates/changes are recorded on the membership database.
- 3.2.2 In addition, grading information is added as and when it is generated.
- 3.2.3 A record may also kept of courses attended by each student.

3.3 Archive

- 3.3.1 After a person has ceased practising for more than a pre-defined period (recommended 6 to 12 months but no longer than 12 months), their data record is archived. The Database Administrator does this.

3.4 Deletion

- 3.4.1 It has been known for people to return after lengthy periods of absence. Consequently, archived records are kept for up to 5 years before they are deleted.
- 3.4.2 Once the computer record has been archived, the paper records are shredded.
- 3.4.3 If there is a potential issue due to an injury to a student, the data must be kept for 7 years after the person leaves, after which the data should be destroyed.
- 3.4.4 The Database Administrator does all this.

3.5 Comments

- 3.5.1 The membership forms are signed. This is the only proof that the Association is authorised to hold personal information and must therefore be kept until the computer record is deleted.
- 3.5.2 The Database Administrator holds the Association computer database. A backup copy is supplied to the Association Secretary. The membership forms are kept secured in a filing cabinet by the Database Administrator.

4 Coaching / First Aid

4.1 Introduction

- 4.1.1 Some Associations manage their own coaching regime. Others use the BAB coaching route. In all cases, the Association will keep a history of Instructor's qualifications. These are held in the main membership database and the Association Coaching Liaison Officer (CLO) holds a subset database.
- 4.1.2 Some Associations may insist that qualified Instructors are required to hold a valid first aid certificate. If so this data may need to be recorded.
- 4.1.3 The Association CLO is sent a subset database on a regular basis to ensure that he/she is aware of any instructors who have lapsed in membership or first aid qualifications.

4.2 Inception

- 4.2.1 Once a person receives a coaching award, the Association CLO raises an "Instructor's Registration Form". This states the grade obtained and the date the grade was obtained. It also states whether which first aid certificate (if any) is in place and the date of expiry. This is passed to the Database Administrator who enters the data onto the membership database and cuts a subset database, which is then returned to the Association CLO.
- 4.2.2 The instructor's membership record includes any Instructor's awards (or loss of them) and first aid awards where necessary.
- 4.2.3 The Database Administrator keeps the registration forms with the membership forms.

4.3 Update / Expansion

- 4.3.1 When changes apply to an instructor's coaching record, the Association CLO raises another "Instructor's Registration Form". This states the relevant changes that have to be made. This is passed to the Database Administrator who enters the data onto the membership database and cuts a subset database, which is then returned to the Association CLO.

4.4 Archive

- 4.4.1 Refer to the section on membership archives.

4.5 Deletion

- 4.5.1 Refer to the section on membership deletions.

5 The World Wide Web

5.1 Introduction

- 5.1.1 If the Association has its own Web Site, it should be managed as per this section. If the Association does not have a web site, it may still need to ensure that data is correctly entered on the BAB Web site.
- 5.1.2 The majority of the data published on this site is data already in the public domain and therefore does not require authorisation to publish. However, the Web Administrator reviews the public domain data on an annual basis to ensure that the information is still valid.
- 5.1.3 Contact details at club level generally are local instructors' names and telephone numbers.
- 5.1.4 Because the WWW is available outside European Union (EU) and therefore the data published could be abused outside the EU, it is important that personal information published on the WWW be explicitly authorised to be published.

5.2 Inception

- 5.2.1 All club instructors are invited annually by the Web Administrator to input/update the club information using the "Club Information and WWW Publication" form.
- 5.2.2 This form is in two parts. The first part contains public domain information and requires no signature. The second part consists of personal information that the instructor is willing to have published. The instructor whose details are being published must sign this part of the form.
- 5.2.3 The Association Data Protection Officer holds the completed forms. Copies are passed to the Web Administrator for inclusion in the Association Web site. Once entered, these copies are shredded.

5.3 Update / Expansion

- 5.3.1 The Web Administrator on an annual basis or when a revised form is submitted reviews / updates the data. Again this is done by form.

5.4 Archive

- 5.4.1 If a club ceases to exist, the computer record for that club is archived by the Database Administrator and the Web Administrator removes the data from the Web site. The club archive is kept for 12 months in case the club is re-started.

5.5 Deletion

- 5.5.1 The Database Administrator deletes archived clubs after 12 months of being in archive.

6 Accidents and Child Protection Specific Issues

6.1 Introduction

6.1.1 There are legal requirements to be adhered to when dealing with Child Protection issues and **any** accidents. A failure to address these legal requirements could lead to prosecution so be warned.

6.2 Accidents

6.2.1 When an accident takes place, you must ensure that the relevant accident form is completed and any additional report(s) or information pertaining to that accident and a copy of the accident form are held by your Association for a minimum of 3 years.

6.2.2 In the case of anyone under the age of 18 who has an accident, that data must be held until they are 21 years old. This is because the child cannot exercise their right to push for litigation until they are 18 and then they have up to 3 years to exercise that right. This is **irrespective** of whether anyone else has taken legal action, including that on behalf of the child.

6.2.3 The data will not be adjusted once kept, and can only be added to.

6.2.4 After the relevant period of time has elapsed as defined in sections 6.1 and 6.2 respectively, the data can then be destroyed.

6.3 Child Protection

6.3.1 Separate guidelines will be incorporated within the Child Protection documentation. However there is a basic fundamental rule that must be adhered to.

6.3.2 If an incident takes place, irrespective of the severity of the complaint, all data pertaining to that event, whether it be the victim, perpetrator or witness information must be kept until the youngest person involved (not necessarily the victim) has reached the age of 21. Again, this is because any of the persons involved could take legal action once they have reached the age of 18 and have up to three years to exercise that right.

6.3.3 A record may also kept of courses attended by each student.

7 Data Security

7.1 Introduction

- 7.1.1 Completed membership forms are secured in a filing cabinet. When no longer required, they are shredded.
- 7.1.2 Grading records are shredded after being added to the computer record.
- 7.1.3 Course information is shredded after being added to the computer record.
- 7.1.4 The database is kept on a secure password protected computer and the database itself is password protected.

7.2 Coaching Information

- 7.2.1 Coaching results are held with the membership records. In addition, the Association Coaching Liaison Officer holds a subset of the Database. This database does **not** hold any personal information. Even so, the database is secured by a password.
- 7.2.2 While a person is on a training course, paper note concerning their progress will be kept by the Coach Tutor. This information is held in a locked filing cabinet and is shredded once the course is completed. This data is kept for 60 days after the course is completed in case the trainee wishes to appeal against the result. After this period, the paper notes are shredded.

7.3 Web Information

- 7.3.1 Due to the fact that any information published on the web is available world wide, no data generated from the membership database is put on the web. Only limited data gathered on a small group of instructors is used. That data is collected on forms specifically warning persons that the data is for the World Wide Web.
- 7.3.2 Individual clubs may have their own Web sites but the Association policy is that no personal information is published on these sites other than data that is already in the public domain.

8 Access to Data

8.1 Request for Access

- 8.1.1 Any member may have sight of their records. All that is required is the following:
- A letter sent to the Association Secretary, requesting their information,
 - A stamped addressed envelope addressed to the owners registered address,
 - A cheque for £25 (example) for administration purposes made out to the Association.
- 8.1.2 It is best practice that if this is a formal request (eg for legal purposes), the letter requesting the information should be sent by registered delivery. This is in the unlikely case that the letter is lost in the post.
- 8.1.3 The Secretary will forward the written request to the Association Data Protection Officer who will supply the information.
- 8.1.4 The Association is duty bound to supply this information within 30 working days of receipt of this request.