



DATA PROTECTION PROCEDURES

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Preface

This document details the procedures by which the British Aikido Board (BAB) controls information: both personal information and information forwarded for the public domain.

The BAB is committed to the correct and legal handling of data and, as required by the Constitution and its Data Protection Policy, all BAB Associations, Clubs and individual members must comply with these procedures.

To this end, the BAB has also put into place guidelines and toolkits for all its Member Associations detailing their legal responsibilities. These guidelines and toolkits are available by download from the “downloads” section of the BAB web site: www.bab.org.uk

The BAB is registered with the Information Commissioner’s Office (ICO).

1. Membership, Club Venue Registration, Professional Indemnity Insurance and Personal Accident Cover.

Membership, Club Venue Registration, Professional Indemnity Insurance and Personal Accident Cover		
1.1	Responsibilities	This area is managed by the BAB Executive Committee and its officers
1.2	Process	<p>Manual Paper Process for Membership</p> <p>Member Associations forward a form containing names, age category and insurance categories of students to the BAB Secretary on a monthly basis, together with the relevant fee. Either by post or electronically via email.</p> <p>On the paper form version no personal information is included other than name, age category and insurance category; consequently the requirements for Data Handling are minimal.</p> <p>Electronic Process for Membership</p> <p>Member Associations forward an electronic form containing names, date of birth, postcode and email address, grade and insurance categories of students to the BAB Secretary on a monthly basis, together with the relevant fee.</p> <p>The full details of the person are held on line including name, address, postcode and telephone number. This data also links directly to coaching data and displays which member has a coaching qualification and suitable venue insurance against each club venue.</p> <p>The BAB Secretary collates the forms and forwards them to the insurance broker for handling, together with the relevant fee.</p>
1.3	Update / Expansion	<p>When using the paper version data is never updated. It is replaced annually.</p> <p>When using the electronic version the data is updated annually using the secure bespoke returns system or updated manually by the individual member.</p>
1.4	Archive / Deletion	<p>Paper copies of the forms are kept for 17 years, after which they are destroyed by shredding.</p> <p>Electronic data is held for 17 years either online or backup, in the main BAB system or archived to the BAB holding area.</p>

2. New Association Membership

2.1	Responsibilities	New Membership is managed by the BAB Membership Officer. There is additional support handled by other BAB Officers.
2.2	Process	<p>The BAB has a Membership Committee that manages the inception of a new Association.</p> <p>All data pertaining to a proposed membership are held by the Membership Secretary on paper records and electronic documents.</p> <p>Should a new Association be admitted to the BAB, all data is passed to the BAB Secretary as a living 'document set' and any data held by the Membership Officer is deleted / destroyed.</p> <p>Also selected data is passed to the BAB Webmaster for addition to the BAB Website management system. After the data is added paper and electronic transfer documents are deleted / destroyed by the BAB Webmaster.</p> <p>Data is deemed to be accurate as the Associations supply the original information and the relevant representatives sign to authorise the use of the data.</p>
2.3	Update / Expansion	The original paper data is held by the BAB Secretary and is not updated. Local PC information concerning the Association Membership Records is held electronically by the BAB Secretary. Backups are kept securely by the BAB Finance Officer.
2.4	Archive / Deletion	<p>BAB New Membership Officer held data. Destroyed when passed to other officers for action.</p> <p>BAB Secretary held data.</p> <p>Should a proposed new Association fail to be admitted to the BAB, all data is deleted within one month for administrative process.</p> <p>BAB Webmaster held data</p> <p>Destroyed directly after being actioned.</p> <p>Online data (BAB Website)</p> <p>Should a current Member Association leave the BAB, the BAB Webmaster will delete association data but will archive the individual members' information for 17 years in archive to the BAB holding area. Once the data has been in archive for the required period, it is securely deleted.</p>

3. Coaching

3.1	Responsibilities	There are three people involved in Coaching Administration. The BAB Coaching Administration Officer (BAB CAO), the BAB Coaching Development Officer (BAB CDO) and the BAB Webmaster.
3.2	Process	<p>Association Coaches</p> <p>The BAB CAO keeps an offline database of all BAB qualified instructor's certification history and Coaching Liaison Officers.</p> <p>Once a person receives a coaching award, the award, together with the name of the individual member and the name of the Member Association are registered in the Coaching Database. While a prospective instructor undergoes his/her training courses, the BAB CAO holds a training record which is kept that includes minimal personal information: contact details etc.</p> <p>Coach Tutors</p> <p>The BAB CAO keeps an offline database of all BAB coach tutors certification history.</p>
3.3	Update / Expansion	A change to a qualification is in effect a new qualification and is handled as such. The BAB Website holds similar information and is maintained by the BAB CAO although sometimes supported by the BAB Webmaster.
3.4	Archive / Deletion	<p>Personal data is kept by the BAB CAO until the person completes his training or indicates that he/she no longer wishes to continue with the training, at which point, the data is archived for 1 month for administrative purposes.</p> <p>Online data (BAB Website)</p> <p>If the individual member is no longer in membership Coaching Data is held against the individual member for 17 years and archived to the BAB holding area. Once the data has been in archive for the required period, it is securely deleted.</p>

4 The BAB Website & Backend Management System

4.1	Responsibilities	This area is managed by the BAB Webmaster and the BAB Coaching Administration Officer (BAB CAO), Also the Member Associations and individual members have access to their own data
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4.2	Process	<p>Public Website</p> <p>The BAB has a web site accessed via http://www.bab.org.uk This site is managed by the BAB Webmaster and assistants. Also other BAB Officers have access to update various parts of the site.</p> <p>The majority of the data published on this site is data already in the public domain. Most public data can be edited / updated by the Member Associations and individual members and they are responsible for keeping it up to date.</p> <p>Hidden BAB Management system</p> <p>The BAB Holding Area is a hidden area that holds IM Member and coaching data that can be used in case of legal requirements. The system also gives access, by the administrator, to all personal data and includes a messaging system to Member Associations and individual member. It also controls the Membership returns system and club data.</p> <p>The area is accessed by login and password with an extra machine created code required to be screen read to ensure robots are not able to scrape the site.</p> <p>Forward Facing BAB Management system</p> <p>All Member Association Web Administrators are able to input, add, update and delete information on the BAB web site after login into the correct area.</p> <p>Club Owner individual members are able to input, add update and delete information on the BAB web site after login into the correct area.</p> <p>Individual Members are able to input, add, update and delete information on the BAB web site after login into the correct area</p> <p>Only when a new Association joins are they required to complete a paper application (a 2-part form). The first part contains public domain information and requires no signature. The second part consists of personal information that the club's instructor is willing to have published. The instructor whose details are being published must sign this part of the form to allow for public disclosure of the information into the public domain.</p> <p>The BAB Webmaster holds the completed paper forms for 1 month for administrative purposes.</p>
4.3	Update Expansion /	<p>The BAB Webmaster seeks to audit the website every 2 years to confirm and ensure that that all information held on the web site is as accurate as possible but personal data is generally updated by the Member Associations and individual members. An individual member's data is updated automatically if the Secure Returns</p>

		system is used by the Member Association.
4.4	Archive / Deletion	<p>If an individual member ceases to be a member, data is archived 17 years and is deleted after the retention period.</p> <p>Once notified of the cessation of a club, the BAB Webmaster deletes the data from the web site.</p> <p>If a Member Association ceases to be a Member, the BAB Webmaster deletes their data from the web site.</p>

5 Insurance Claims

5.1	Responsibilities	This area is managed by the BAB Insurance Liaison Officer
5.2	Process	<p>Claim Information Inception</p> <p>Member associations or individual members complete a claim form which can be found on the BAB Website www.bab.org.uk</p> <p>The Claim Form has two purposes: it identifies that an accident has taken place and indicates that there is theoretically the possibility of a claim being made. It is not an indication that there will automatically be a claim against the relevant Member Association or the BAB.</p> <p>There are two claim forms that must be completed: the Personal Accident Claim Form completed by the claimant (the individual member), and the Incident Notification Advice Form, completed by the Club/Association official.</p> <p>Completed and signed claim forms are sent by email or hard copy to the BAB Insurance Liaison Officer for processing.</p>
5.3	Update Expansion /	<p>Claim Information Update</p> <p>Should additional information be forwarded to the BAB concerning a claim, the BAB Insurance Liaison Officer using the procedure above.</p> <p>The Insurer will keep the BAB Insurance Liaison Officer apprised of all outstanding claims and their status.</p>
5.4	Archive / Deletion	Once a Claim is deemed closed, the information held by the BAB will be held for up to one month then deleted for administrative purposes

6 DBS Management

6.1	Responsibilities	<p>The handling of all matters pertaining to DBS Checks is managed by the BAB Lead Safeguarding Officer (BAB LSO) and the Vulnerable Adults Officer.</p> <p>In this section BAB LSO is considered both for both Child Safeguarding and Vulnerable Adults.</p>
6.2	Process	<p>The BAB is committed to its Child Safeguarding and Vulnerable Adults Policies. Please refer to these Policies for further information including definitions of acronyms used in this section.</p> <p>Where DBS is referred to CRB can be used in its place, The CRB system has been replaced by DBS but at this time some IM may still have valid CRB disclosures.</p> <p>Inception/acquiring of data</p> <p>Each Member Association is responsible for risk assessing and administering DBS checks according to the prevailing guidelines as issued by the BAB.</p> <p>Information may be acquired from individual DBS checks where these are requested by the BAB LSO in accordance with recruitment risk assessment procedures.</p> <p>Any DBS disclosures are held in a locked environment which is not accessible to any non-BAB / Safeguarding Personnel.</p> <p>Release of information to the individual</p> <p>DBS information should not be held at Association level other than the unique application reference number and date. This is held as proof that the DBS check has been made and when.</p> <p>All requests for visibility of DBS disclosure information should be referred back to the Disclosure Barring Service as it is technically their information to release. Should legal representation be made of the BAB for disclosure release, the BAB Lead LSO will seek advice from CPSU and/or other relevant legal bodies as to the way forward.</p> <p>Release of information to third parties</p> <p>It is the BAB's position is that the welfare of children should override all other considerations, providing that any disclosure of information is reasonable, relevant and proportionate.</p> <p>The BAB LSO will as part of his/her work routinely release details of DBS disclosures in order to facilitate the work of the CMG. However, there will be no identifying information released. Members</p>

		<p>of the CMG operate according to a Code of Confidentiality and will destroy all emails and documentation once a decision has been taken.</p> <p>Any other disclosures to third parties will be undertaken in consultation with the appropriate organisations (e.g. CPSU, NSPCC). However the welfare of the child will always be the priority in the absence of such advice being available.</p> <p>Where necessary, information will be disclosed to third parties using Email.</p>
6.3	Update Expansion /	<p>Additional information will only be acquired if further investigation is deemed necessary by the BAB's Case Management Group (CMG). This information will usually be solicited by post or email. It is normal practice to do this by a secure method of delivery, not recorded delivery or encryption.</p>
6.4	Archive / Deletion	<p>Data relating to Case Management decisions and DBS disclosure information will be retained for 17 years.</p>

7 Safeguarding – Incident Management

7.1	Responsibilities	<p>The responsibility of how the data is handled during the management of a Child Protection Incident is managed by the BAB Lead Safeguarding Officer (BAB LSO) and the Vulnerable Adults Officer, as appropriate.</p> <p>In this section BAB LSO applies both for both Child Safeguarding and Vulnerable Adults.</p>
7.2	Process	<p>Inception/acquiring of data</p> <p>Details of incidents will usually be reported to the BAB by a Member Association CPO or CWO using the Safeguarding Policy template.</p> <p>However it is possible that incidents will be recorded by the BAB LSO, for example, in instances of 'whistle-blowing'.</p> <p>Release of information to the individual</p> <p>Requests for access to BAB case notes should be made in writing to the BAB Secretary.</p> <p>The BAB LSO reserves the right to take advice from the CPSU and/or other relevant legal bodies concerning what information may and may not be released on a case-by-case basis.</p> <p>Release of information to third parties</p>

		<p>It is the BAB's position is that the welfare of children should override all other considerations, providing that any disclosure of information is reasonable, relevant and proportionate.</p> <p>The BAB LSO will as part of his/her work routinely release details of DBS disclosures in order to facilitate the work of the CMG. However, there will be no identifying information released. Members of the CMG operate according to a Code of Confidentiality and will destroy all emails and documentation once a decision has been taken.</p> <p>Any other disclosures to third parties will be undertaken in consultation with the appropriate organisations (e.g. CPSU, NSPCC). However the welfare of the child will always be the priority in the absence of such advice being available.</p> <p>Where necessary, information will be disclosed to third parties using email.</p>
7.3	Update Expansion /	<p>Additional information will only be acquired if further investigation is deemed necessary by the BAB's Case Management Group (CMG). This information will usually be solicited by post or email. It is normal practice to do this by a secure method of delivery, not recorded delivery or encryption.</p>
7.4	Archive / Deletion	<p>Data relating to Case Management decisions and DBS disclosure information will be retained for 17 years.</p>

8 Safeguarding – Appeals Issues

8.1	Responsibilities	<p>The responsibility of how the data is handled during the management of an Appeals Panel hearing is managed by the Chairman of the BAB in the capacity of President of the Appeals Panel.</p> <p>Should the Chairman be under scrutiny, another Executive Board Officer will take this role.</p>
8.2	Process	<p>The BAB has an Appeals Protocol (AP).</p> <p>Release of Information to the individual or third parties</p> <p>As the data is now part of the CMG file, release is handled in accordance to that process document.</p>
8.3	Update Expansion /	<p>Additional information may be acquired on a case-by-case basis. Sometimes it may be necessary to meet with individuals and if so a meeting report will be produced which will be added to the case notes. This report must be signed off by the interviewer and interviewee and any witnesses present and consequently cannot</p>

		<p>be taken in shorthand.</p> <p>Both the handwritten notes and the ensuing report will be forwarded to the BAB LSO by hand or recorded/special delivery for inclusion into the case file.</p>
8.4	Archive / Deletion	As the data is now part of the CMG file, archive is handled in accordance to that process.

9 Data Protection Information

9.1	Responsibilities	<p>The control of Data Protection information is managed by the BAB Data Protection Officer (BAB DPO).</p> <p>All breach incidents are also managed by the BAB DPO.</p>
9.2	Process	<p>Introduction</p> <p>The BAB DPO manages a list of current Member Association Data Protection Officers (ADPO). This includes personal information: address and contact phone numbers.</p> <p>Inception</p> <p>All MA must complete a data processing agreement which details the personal contact details of the current ADPO.</p> <p>The information is transposed to a database, held by the BAB DPO. In addition, the paper copies are kept locked away securely.</p>
9.3	Update / Expansion	<p>The data is audited every 2 years for accuracy.</p> <p>When updated forms are received, the database is updated and the original forms shredded and the online version is also updated.</p> <p>If the Online Association Database is updated by a Member Association it is also required to advise the BAB DPO.</p>
9.4	Archive / Deletion	<p>There is no requirement for the BAB to hold archive information of "past" ADPO's.</p> <p>Should a Member Association cease to be a member of the BAB, the ADPO information is destroyed with 1 month of the announcement being made (both electronically and physically).</p>

10 Other Disciplinary Issues – Management

10.1	Responsibilities	The Disciplinary Sub-committee is responsible for the management of the data handled there-in.
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10.2	Process	Any documentation collated during the investigation will be held securely by the chairman of the Disciplinary Sub-committee.
10.3	Update / Expansion	Any updated documentation collated during the investigation will be held securely by the chairman of the Disciplinary Sub-committee.
10.4	Archive / Deletion	Once the investigation is completed, the file will be sealed and archived in accordance with the BAB policy.

11 General Requests - Access to Data and Right to be Forgotten

11.1	Responsibilities	All requests for access to data are managed via the BAB Secretary to the BAB Data Protection Officer
11.2	Process	<p>Request for Access</p> <p>It must be remembered that the membership of the BAB consists of the Associations and their individual members. A Member Association or individual member can request copies of all their data.</p> <p>Any Member Association or individual member may have sight of their data. All that is required is the following:</p> <ul style="list-style-type: none"> • A letter or email sent to the BAB secretary, for the BAB Data Protection Officer, requesting their information, • No charge will be made unless the request is found to be excessive. <p>The request for information should be sent by registered delivery. This is in the unlikely case that the letter is lost in the post.</p> <p>The BAB DPO will consider the request for information in accordance with GDPR requirements to determine whether the disclosure is required or prohibited.</p> <p>Should the request be legitimate, the BAB secretary will contact all BAB officers to ensure that any information matching the request and controlled by them is copied and returned to the BAB Data Protection Officer within 20 working days.</p> <p>The BAB is duty bound to supply this information within 30 working days of receipt of this request.</p> <p>Should the information requested include DBS/CRB or Child Protection information, there may be an unspecified additional delay while legal questions are resolved.</p>

11.3	Process	<p>Right to be forgotten</p> <p>It must be remembered that the membership of the BAB consists of the registered Aikido Associations themselves and their individual members. A Member Association can request copies of all their data.</p> <p>Should the request be legitimate, the BAB secretary will contact all BAB officers to ensure that any information matching the request shall be dealt with.</p> <p>Any Member Association or individual member may request for Personal Data to be forgotten</p> <p>If it is considered any Personal Data may be required for legal purposes the data shall be archived and hidden on the BAB Website but not erased the Data Subject shall be advised of the fact.</p> <p>The BAB is duty bound to advise the outcome of the request to be forgotten within 30 working days of receipt of this request.</p> <p>The BAB is duty bound to advise the outcome of the request to be forgotten within 30 working days of receipt of this request.</p> <p>If it is considered any Personal Data may be required for legal purposes the data shall be archived and hidden on the BAB Website but not erased and the Data Subject shall be advised of the fact.</p> <p>Should the information requested include Insurance, DBS/CRB or Child Protection information, there may be an unspecified additional delay while legal questions are resolved.</p>
11.4	Archive / Deletion	<p>The BAB Secretary will liaise with the BAB DPO in order to confirm that the request has been resolved and the letter archived for 1 month for administrative purposes .</p>

12 Breach and Notification Process

12.1	Responsibilities	<p>Should a Data Protection breach be identified, (including loss or theft of computer equipment holding information), the BAB DPO must be informed generally within 48 hours of the breach.</p> <p>The BAB DPO will instigate the process of Detection and Investigation of Security Breaches (defined below) in direct discussion with the ICO.</p>
12.2	Process	<p>Breach Reporting</p> <p>Any individual who suspects that a Personal Data Breach has</p>

		<p>occurred due to the theft or exposure of Personal Data must immediately notify the Board's DPO Office providing a description of what occurred.</p> <p>Notification of the incident can be made via e-mail to: babdpo@bab.org.uk. The BAB Data Protection Officer will investigate all reported incidents to confirm whether or not a Personal Data Breach has occurred.</p>
12.3	Process	<p>Detection and Investigation of Security Breaches</p> <p>Notification</p> <ul style="list-style-type: none"> • Once the BAB DPO has identified the nature and quantity of the data lost and the extent of the breach, the ICO will be contacted. • Law enforcement will be informed at the earliest possible opportunity should any criminal act be suspected and if directed by the ICO. • All potentially affected people will be notified in writing of the situation as and when deemed appropriate by the ICO. <p>Lockdown</p> <p>Should an individual involved in the loss of the data hold other data, that information will be secured.</p> <p>Incident Management</p> <p>The Incident will be managed by the BAB DPO in conjunction with the ICO and law enforcement as necessary.</p> <p>The BAB DPO will write a report of the incident for publication to its members. This report will exclude personal information and will be cleared by the ICO prior to publication.</p>
12.4	Archive / Deletion	<p>The BAB DPO will complete a dossier detailing all aspects of the breach. The lifecycle of the dossier will be indefinite.</p>

13 Law Enforcement Requests & Disclosures

In certain circumstances, it is permitted that Personal Data be shared without the knowledge or Consent of a Data Subject. This is the case where the disclosure of the Personal Data is necessary for any of the following purposes:

- Prevention or detection of crime.
- Apprehension or prosecution of offenders.

- Assessment or collection of a tax or duty.
- By the order of a court or by any rule of law.

If The BAB Processes Personal Data for one of these purposes, then it may apply an exception to the Processing rules outlined in this policy but only to the extent that not doing so would be likely to prejudice the case in question. If The BAB receives a request from a court or any regulatory or law enforcement authority for information relating to a BAB Contact, the BAB Data Protection Officer must be immediately notified who will provide comprehensive guidance and assistance.

14. Notice for use on a membership application

To allow compliance with the GDPR requirements the BAB requires that the following notice be added to all association membership forms:

The personal data you provide may be held by your Club and you Association [Add your Association Name]. The basis on which your Association, your Club and the British Aikido Board (BAB) the Governing Body of Aikido in the UK processes your personal data is their legitimate interest in the following: administration purposes in managing a sports club/association, maintaining accurate membership records, safeguarding of members, obtaining insurance through BAB membership, informing members of news and information about the BAB and Aikido in general. The BAB [and add any others] [is/are] the only third party(s) with whom we share any of your personal data. The association will provide the BAB with your personal details when first applying for, or renewing, your BAB membership and other details in instances where it is necessary for the BAB's functioning as a national governing body.

You have the right to request a copy of your personal data and other rights such as erasure or correction of your personal data, as well as the right to make a complaint to the Information Commissioners Office.

For further details see the BAB Data Protection Policy which is available at www.bab.org.uk. The policies also summarise the approach to retention of personal data.

If you have further queries, the BAB has a Data Protection officer who can be contacted at the following email address: dpo@bab.org.uk.

If you have any queries, the [Add your Association] has an officer you can contact at the following email address: [Add Association DPO Contact Address]

15 Review

These procedures will be reviewed at intervals of 3 years to ensure it remains up to date and compliant with the law.