

Bristol & Gloucester Gliding BGGC Data Protection Policy

Version 1.0, March 2017

BGGC Committee

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DATA PROTECTION

1 Background

Where the BGGC (Bristol and Gloucestershire Gliding Club) holds information about individuals, it is a data controller and must comply with the 'principles' put in place by the Data Protection Act 1998, to make sure that information is handled properly.

These state that data must be:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate
5. Not kept for longer than is necessary
6. Processed in line with an individual's rights
7. Kept secure
8. Not transferred to countries outside of the EEA without adequate protection.

By law data controllers have to keep to these principles.

2 Notification

As a Not For Profit organisation the understanding of the committee is that, at this time registration with the Information Commissioners Office is not required by law. This applies providing we:

- only process information necessary to establish or maintain membership
- only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
- only share the information with people and organisations necessary to carry out the organisation's activities. Or if individuals give permission to share their information, this is OK
- only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration.

DATA PROTECTION

3 BGGC Data Protection Policy

1. The Bristol & Gloucestershire Gliding Club (“the BGGC”) holds two types of information which are covered by this policy
 - **personal** information – information about individuals such as names, addresses, job titles, flying experience and qualifications.
 - **sensitive** personal information – in general this kind of information is only held about employees. There are, however, instances where sensitive information is held about other people.

The people about which the BGGC holds information are referred to in this policy as data subjects.

2. The BGGC will not hold information about individuals without their knowledge and consent.
3. The BGGC will only hold information for specific purposes. It will inform data subjects what those purposes are. It will also inform them if those purposes change. See “BGGC Data Protection Operational Practices “ for details.
4. Information will not be retained once it is no longer required for its stated purpose, this does not include information retained for audit purposes or for historical purposes.
5. The BGGC will seek to maintain accurate information by creating ways in which data subjects can update the information held. This will primarily take the form of an information validation at annual membership renewal.
6. Data subjects will be given the option not to receive marketing mailings from the BGGC (but see 3 above). The BGGC will not share information with external organisations for marketing purposes.
7. Data subjects will be entitled to have access to information held about them by the BGGC on written request.
8. The BGGC may disclose information about data subjects to the British Gliding Association (BGA). A copy of the BGA’s Data Protection Policy is available on request from the BGA Office. The BGGC may disclose information about data subjects to the Civil Aviation Authority (CAA) where required to do so.
9. Except for the provisions of Clause 8 above, information about data subjects will not be disclosed to other organisations or to individuals who are not members of the BGGC, BGGC staff or BGGC Committee members except in circumstances where this is a legal requirement, where there is explicit or implied consent (for instance in relation to release of medical information in case of an emergency) or where the information is publicly available elsewhere.

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10. The BGGC has procedures for ensuring the security of all personal data. Paper records containing confidential personnel data are disposed of in a secure way.
11. The BGGC has a set of procedures covering all areas of its work which it follows to ensure that it achieves the aims set out above.
12. The BGGC Committee Marketing Representative has been designated as the Data Protection Compliance Officer for the BGGC.
13. At the beginning of any new project or type of activity the BGGC member or member of staff managing it will consult the Data Compliance Officer about any data protection implications.
14. There may be situations where the BGGC works in partnership with other organisations on projects which require data sharing. The BGGC will clarify which organisation is to be the Data Controller and will ensure that the Data Controller deals correctly with any data which the other organization has collected.
15. All new BGGC staff will be given training on the data protection policy and procedures.
16. The BGGC will carry out an annual review of its data protection policy and procedures.

This policy was adopted at a meeting of BGGC committee

Held on 24 March 2017

Signed on behalf of the Management Committee _____

Role of signatory : D Welch, Chairman

DATA PROTECTION

4 BGGC Data Protection Operational Practices

The following operational measures will be put in place to ensure that the club follows the above policy

4.1.1 *Personal Information*

1. The BGGC will hold some or all of the following data for members, including temporary members:
 - a. Contact Information, name, address, telephone number(s), email address(s), next of kin or emergency contact details
 - b. Personal data relevant to flying such as date of birth, flying experience, flying qualifications, medical certificates and expiry dates
 - c. Financial transaction data relevant to club membership
 - d. Profile data such as skills, non flying qualifications and experience
2. The BGGC will use the contact information described above for direct contact from BGGC Staff, Committee members or other members involved in club operations (flying and non flying) on subjects relevant to club membership or flying
3. The BGGC will use the contact information to keep the member informed of club operations and activities by mail and email, including promoting club activities and safety related information.
4. Member names and (where required) phone numbers may also appear on printed lists published within the BGGC premises relevant to club operations such as flying currency, duty rosters, club organization, achievements, financial control or other activities directly related to the BGGC
5. Members will be asked to verify their contact information at the time of annual membership renewal.
6. Personal information will be retained for 3 years after membership ceases or where it is included in archives kept to meet financial or legislative requirements

4.1.2 *Sensitive personal information*

Sensitive personal information is only kept for BGGC employees and is exclusively used in connection with their employment by the BGGC.

Sensitive personal information is only disclosed to BGGC employees or club officers directly concerned with the employment of paid staff. This may include:

- BGGC Chairman, Vice Chairman, Secretary and Treasurer
- BGGC CFI (for flying staff only)
- Directors of BGC Pty Ltd.