

GDPR 2018 -- Avon AA Situation

The Avon Athletic Association, in common with other voluntary organisations, needs to comply with the General Data Protection Regulation (GDPR) and other legislation regarding personal data. This document outlines the personal information which the Avon AA holds and how the Avon AA uses it.

1. E-mail Circulation lists:

The General Secretary maintains a list of e-mail addresses so that e-mails containing Notices of forthcoming Avon AA business meetings, Minutes of past meetings, and other items of information about local, area, regional and national athletics matters can be sent to:

- ... the contact(s) for each Member Organisation as advised to the General Secretary
(a club contact is free to use an e-mail address such as secretary@ourclub.co.uk)
- ... the Officers and Trustees
- ... those Honorary Members and Life Vice-Presidents who wish to receive such e-mails
- ... any others who wish to receive such e-mails (at the Officers' discretion)

From an e-mail circulated by Chris Goodwin, Administrator of the Lute Society, on 6th April 2018:

"There seems to be some confusion in the new laws, because under the General Data Protection Regulation we have to ask you to 'opt in' to receive these weekly emails of lute announcements, and to appear on our website map - yet the Deputy Commissioner from the Information Commission Office has publicly stated (BBC Radio 4, 3rd April) that there is a 'soft opt-in' allowable where there is 'an existing relationship', (e.g. in the case of an existing customer) - under rules parallel to the GDPR, called the Privacy and Electronic Communications Regulations. It seems that you can have an opt-out rather than an opt-in provided this clear to the customer".

The Avon AA wishes to take advantage of this 'opt-out' clause for existing contacts. Anyone on this circulation list can opt to be removed from the list, or to receive their e-mails blind-copied, by contacting the General Secretary. The General Secretary issues regular reminders about this. No e-mail addresses will be passed to any commercial organisation.

2. Competition Entries: Avon AA

The Avon AA currently enters teams in the following competitions:

2.1 South-West Inter-Counties Cross-Country Championships

Competitors enter this event as individuals (so the security of the personal data will be the competition organisers' responsibility), and the County will select teams from those individual entrants who have designated themselves as eligible for Avon teams and notify the relevant clubs of team selections.

2.2 South-West Inter-Counties Track and Field Championships

Competitors enter this event as individuals provided that they have achieved the organisers' entry standards (so the security of the personal data will be the competition organisers' responsibility). The County will select teams from those individual entrants who have designated themselves as eligible for Avon teams: and notify the relevant clubs of team selections.

2.3 South-West Inter-Counties Road Running Championships

Competitors enter either/ both of the Championships races as individuals (so the security of the personal data will be the competition organisers' responsibility). The County will select teams from

those individual entrants who have designated themselves as eligible for Avon teams, so the Road Running Coordinator may need to obtain e-mail addresses of selected athletes to notify them of team assembly arrangements. Any e-mail addresses received will not be released to any commercial organisation.

3. Competition Entries: joint Avon AA and Somerset AA teams.

3.1 UK CAU Inter-Counties Track and Field Championships

Competitors enter as individuals provided that they have achieved the organisers' entry standards (so the security of the personal data will be the competition organisers' responsibility), and the County will select teams from those individual entrants who have designated themselves as eligible for Avon and Somerset teams and notify the relevant clubs of team selections.

3.2 UK CAU Inter-Counties Cross-Country Championships

The lead Cross-Country Coordinator for the combined team (currently an Avon AA activist) will need to submit nominations for team members or potential members of the Avon & Somerset teams for this competition into the on-line entry system, and to pass on information about the event. For this, they will need the following items of personal information:

- ... surname and forename
- ... date of birth
- ... gender
- ... EA Registration number (or Scots / Welsh / Northern Irish equivalent)
- ... eligibility criterion for Avon and Somerset teams (birth / residence / Armed Forces base)
- ... e-mail address for contact (for athletes under 16, parent/guardian's e-mail)
- ... results from recent Cross-Country events possibly not known to selectors
- ... (optionally) mobile number for last-minute contact

This information will not be passed to any other individual, club or commercial organisation.

The personal information will be stored on the Avon AA General Secretary's own PC, which has no shared access with any other machine. The General Secretary takes regular backups of its contents onto a dismountable storage medium.

Note: the entry processes for any of these events could change in years to come, or new forms of competition may be developed. In such cases additional information may be required.

4. Information on Technical Officials

The Avon AA Track and Field Officials Coordinator, and the Avon AA Endurance Officials Coordinator (at present both posts are held by the same person) will from time to time extract information from UKA's TRINITY database, to obtain current information on the e-mail or other contact details for officials in the area, their officiating qualifications, and their DBS status. This information will be used for recruiting technical officials for meetings and for advising officials on education and progression within the sport.

5. Data Retention

The personal data as mentioned in this document will be deleted:

- ... on request from the individual (or in the case of an athlete under 16, their parent/guardian)
- ... if the athlete ceases to be registered with England Athletics or equivalent bodies
- ... if an individual has ceased to hold any management role in the Association, unless they opt to continue receiving information

... if the records are more than four years old.

Data Integrity

No personal data of any athlete, officer, or volunteer connected with the workings of the Association will be released to any marketing organisation, or to anyone not involved in a relevant management role in the Association.

John Deaton, General Secretary, Avon Athletic Association

May 2018

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