

Confidentiality and Data Protection Policy

Solidarity Sports recognises the right of individuals to confidentiality and that they have a right to expect that personal details will be kept confidentially and in line with the requirements of law.

Solidarity Sports recognises that misuse of data can be damaging and distressing and is committed to but not limited by, the principles of the Data Protection Act 1998 which provides individuals with protection from unwanted or harmful use of data.

Solidarity Sports also believes that the right to privacy, confidentiality and appropriate use of data are essential to ensure all individuals have full confidence in the organisation and are treated with respect and dignity.

Data Protection

All staff are expected to abide by the regulations set out in the Data Protection Act regarding the storage of personal data on individuals. Under the Data Protection Act 1998 we have responsibilities regarding the data and information we hold on individuals. It is necessary for the organisation to collect personal data and other information about an individual in order for it to carry out its functions as a service provider, fundraising organisation, employer and provider of volunteering opportunities.

Accordingly we need to comply with certain principles regarding data:

- Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless certain conditions are met.
- Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the Act.
- Data should be kept secure and appropriate technical and organisation measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to a country or territory outside the United Kingdom, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

All Solidarity Sports employees and volunteers must ensure that they work within these principles. The Director can provide you with further information on the Data Protection Act 1998 and its implications.

Data management

The Director of Solidarity Sports oversees data management in consultation with the Volunteer Coordinator.

Responsibilities

The Director and Volunteer Coordinator are responsible for ensuring that all staff and volunteers at Solidarity Sports are aware of the legal and policy restrictions placed upon holding and processing personal data; that personnel comply with these requirements; and that personal data is held in accordance with the Solidarity Sports Notification under the Data Protection Act.

Workers and volunteers have a legal right to access information that an employer may hold on them. This could include information regarding any grievances or disciplinary action, or information obtained through monitoring processes. If requested, a 40 day time limit is stipulated for response. Information can be withheld if releasing it would make it more difficult to detect crime or the information is about national security. If an employee or volunteer feels the organisation has misused information or hasn't kept it secure they can contact the Information Commissioner's Office.

Physical security

The Solidarity Sports server is located in the main office. Access to this room is limited to personnel authorised by the Director.

It is not possible to ensure that computer terminals are always kept out of the reach of unauthorised personnel. However, terminals should never be left unattended when connected to the network, unless they are locked against casual use. Users will be logged out of the network if the computer is idle for 10 minutes or more. All staff are expected to be vigilant with regards to computer access; staff should challenge anyone who appears to be using equipment without permission.

Equal vigilance should be given to paper records. Personal data held on paper should be kept in locked drawers, cabinets or archive rooms.

Computer passwords

Each authorised user of the Solidarity Sports computer network creates a unique password. Passwords may be changed by the user. On no account should a personal password be disclosed to any person, other than the Director.

Disclosure of information

On no account should personal data be disclosed to a third party unless staff are absolutely sure that such disclosure is authorised. Disclosure is only permitted if it is within the terms of Solidarity Sports' Notification under the Data Protection Act. If in doubt, refer the matter to the Director.

Retention of information

Personal data should not be kept for longer than is necessary. Some of the most common type of records that have statutory requirements are listed in the box below:

Record	Statutory retention period	Statutory authority/Reason for retention period
Accident books, accident records/reports	3 years after the date of the last entry	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163)
Accounting records	6 – 10 years	Section 221 of the Companies Act 1985/Charities Act
Income tax and NI returns, income tax records and correspondence with the Inland Revenue	not less than 3 years after the end of the financial year to which they relate	The Income Tax (Employments) Regulations 1993 (SI 1993/744)
Records relating to events notifiable under the Retirement Benefits Schemes (Information Powers) Regulations 1995, records concerning decisions to allow retirement due to incapacity, pension accounts and associated documents	6 years from the end of the scheme year in which the event took place, or the date upon which the accounts/reports were signed/completed.	The Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103)
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	3 years after the end of the tax year in which the maternity period ends	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960)
Statutory Sick Pay records, calculations, certificates, self-certificates	3 years after the end of the tax year to which they relate	The Statutory Sick Pay (General) Regulations 1982 (SI 1982/894)

Wage/salary records (also overtime, bonuses, expenses)	6 years	Taxes Management Act 1970
--	---------	---------------------------

Personnel Records

Personnel records are kept digitally in a password protected computer. Children's records, DBS checks, sickness and injury records are held separately.

In accordance with the recommended retention period, Personnel Records are kept for 6 years after employment ceases, to cover the time limit for bringing any civil legal action.

Confidentiality

Solidarity Sports' Confidentiality policy is set out below.

All paid staff, volunteers and management committee members are expected to abide by this policy. Clients using our services will have the relevant parts of this policy explained to them.

During your employment or volunteering with Solidarity Sports you have certain duties:

- Of confidentiality, covering general information about Solidarity Sports work, processes and procedures and the protection of personal data
- To act in good faith
- To act honestly
- Not to compete with Solidarity Sports or its services

With the exception of disclosures permitted by the Public Interest Disclosure Act 1998 you must not disclose any confidential information arising out of your employment or volunteering at any time unless such disclosure is authorised by the Director.

Solidarity Sports offers the following advice to help you protect sensitive or confidential information:

- Mark documents as confidential and envelopes as "private and confidential"
- Be aware when documents are at risk of exposure e.g. when copying, on view on your desk or PC screen and ensure you log off when moving away from your desk
- When saving a document which contains confidential information, ensure it is saved to the server rather than to the individual computer terminal
- Restrict the circulation of confidential documents
- Be aware of other occupants in ear shot when discussing colleagues, volunteers or service user's personal information
- When disposing of confidential documents ensure they are shredded and not recycled

As a guide, the type of confidential information which you are likely to come into contact with are as follows: financial, funding and business planning, children/families and staff personal matters.

For information on security and monitoring, please see the Solidarity Sports Use of Email and Electronic Systems Policy.

Breaches of security

If staff are aware of any breach of this policy, or of the security of data generally, they should report this matter to the Director. The Director must present a report on the incident to the Chair of Trustees within two weeks of notification.

Solidarity Sports takes allegations of a breach of this policy seriously and will follow the Disciplinary procedure to investigate and deal with such allegations.

Updated: October 2022

For review: October 2025