



GDPR Framework

This Spreadsheet includes

2	GDPR Alignment Checklist
3	Athletes - Parents Journey Map
4	Coach - Club Officials Journey Map
5	Data Inventory
6	Data Security
7	Lawful Processing Records
8	Third Party Processors
9	Risk Register
10	Privacy Notice Register
11	Legitimate Interest Assessment Register
12	Breach Register
13	Subject Access Request Register

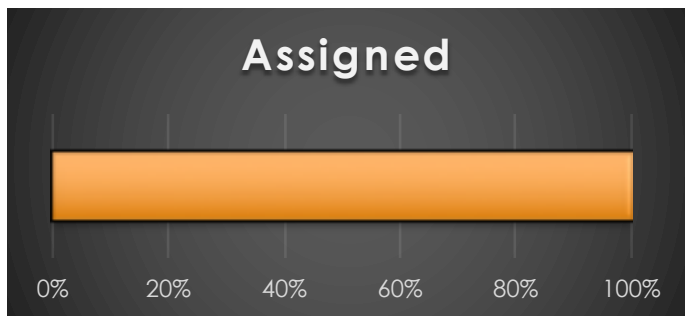
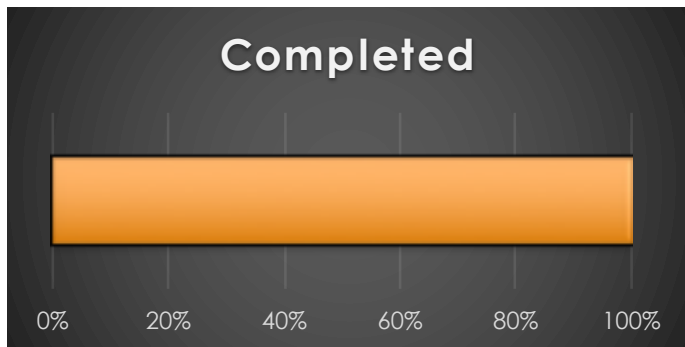
Version 1.0

B L A C K
P E N N Y
C O N S U L T I N G

Work Register

Follow the guidance on each sheet in the yellow boxes, follow the tabs in order.

[Please watch this video in advance of completing this sheet.](#)



GDPR ALIGNMENT

CATEGORY

Compliance Plan

Impact Assessment

Impact Assessment

Impact Assessment

Impact Assessment

Impact Assessment

Impact Assessment

Consent

Legitimate Interest

Staff Awareness

Staff Awareness

Data Protection Office

Compliance Plan

NT CHECKLIST

TASK

Review the What is GDPR document

Select/Define Example Data Journey Map

Complete Data Inventory of all Personal Data sources

Complete table of all Data Security in place for Personal Data protection

Complete Lawful Processing Records tab

Document all Third Party Processors used today

Create risk mitigation plan

Establish baseline of required Privacy Notices in the Privacy Notice Register

Where Legitimate Interest is used confirm balance test carried out and register this

Reviewed and distributed Breach Notification Process and Form

Reviewed and distributed Subject Access Request Process

Communicate to coaches where to report breaches and subject access requests

Complete risk assessment - This register


ASSIGNED	NAME	COMPLETE
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Data Storage	 Club Secretary Portal <input checked="" type="checkbox"/> Secretary Portal	<input type="checkbox"/> PaperForm	<input type="checkbox"/> OneDrive	<input type="checkbox"/> DropBox
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Onward Communications	 E-Mail <input checked="" type="checkbox"/> E-mail	<input type="checkbox"/> Paper Form	<input type="checkbox"/> DotMailer
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Third Party Recipients	 England Athletics <input checked="" type="checkbox"/>	 Ever Organisations <input checked="" type="checkbox"/>
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[Please watch this
video in advance of
completing this
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Onward Communications	<div style="text-align: center; margin-bottom: 10px;">  E-Mail </div> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"><input type="checkbox"/> Paper Form</div> <div style="text-align: center;"><input checked="" type="checkbox"/> E-mail</div> <div style="text-align: center;"><input type="checkbox"/> DotMailer</div> </div>
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Third Party Recipients	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  England Athletics <input checked="" type="checkbox"/> </div> <div style="text-align: center;">  Eve Organ <input checked="" type="checkbox"/> </div> </div>
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Journey

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: The purpose of this is to capture the data for coaches and club officials that exist within your club's digital representation

[Please watch this video in advance of completing this sheet.](#)

For the collection of digital data from coaches and club officials, usually when they join the club, or their details change or they leave

digital data on the coach or official collected, deselect all that do not apply to leave your transfer methods. If there are other systems add the detail to the Data Inventory Tab

Where is this data collected where is this data stored for further use? Select all that do not apply to leave your storage methods. If there are other systems add the detail to the Data Inventory Tab

For any outbound data connections you make that involve the coaches or club officials data, what do you use? Select all that do not apply to your transfer methods. If there are other systems add the detail to the Data Inventory Tab

From third parties do you pass coaches and club officials data? Deselect all that do not apply to leave your third party details. If there are other systems add the detail to the Data

Inventory Tab

BLACKPENNY

PURPOSE : The purpose of this form is to capture the data processes that exist within your club and evidence what you are doing with that data

[Please watch this video in advance of completing this sheet.](#)

This form is fully open for edits. If the

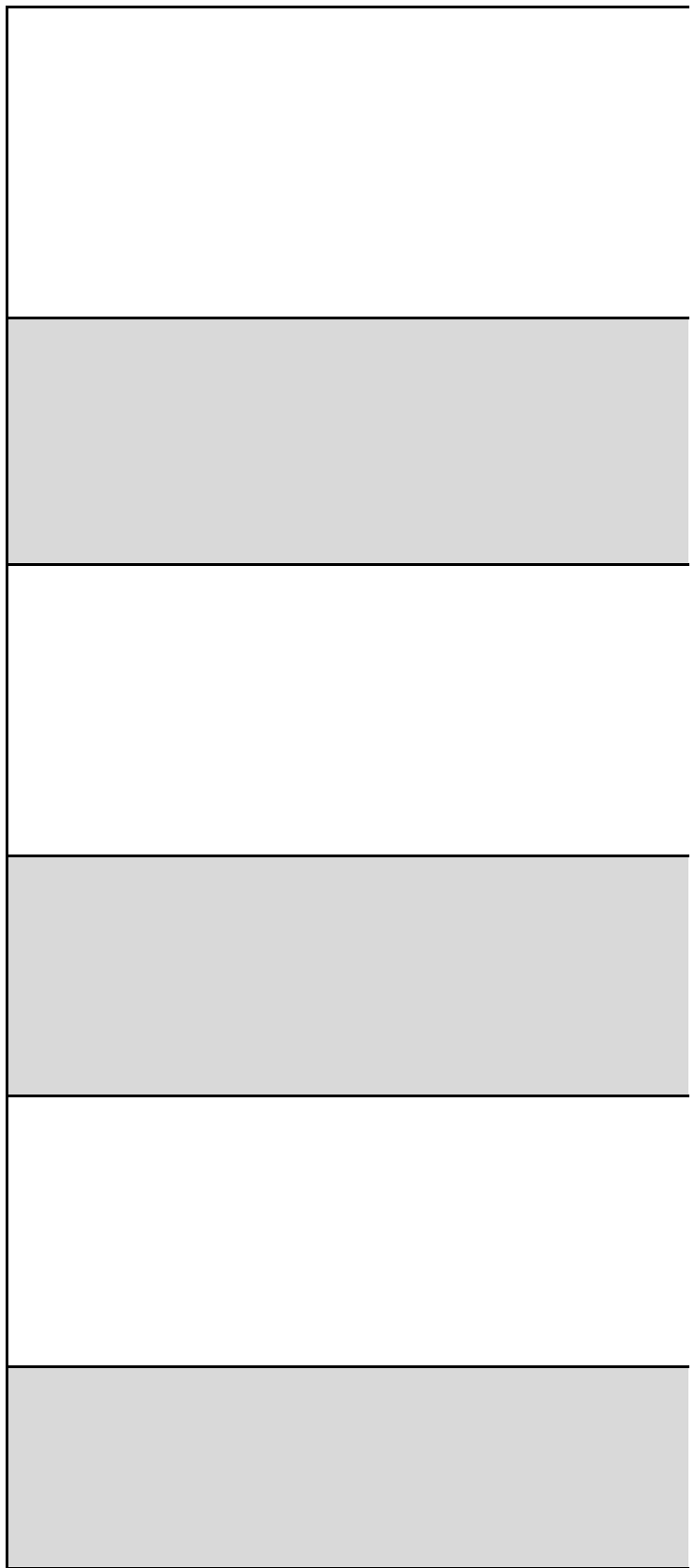
PROCESS	DIRECTION	OWNER
Data	Receive or Transf	Data owner
This is the process where personal data is gathered or transferred, these are examples to be used if applicable to your club	Is the direction of the personal data movement inbound to the club or outbound	Who is gathering or transferring the personal data
Club Affiliation	Outbound	Club Official
New club official joining	Inbound	Club Official
New athlete joining and registering with England Athletics	Inbound	Club Official
New athlete joining without registering with England Athletics	Inbound	Club Official

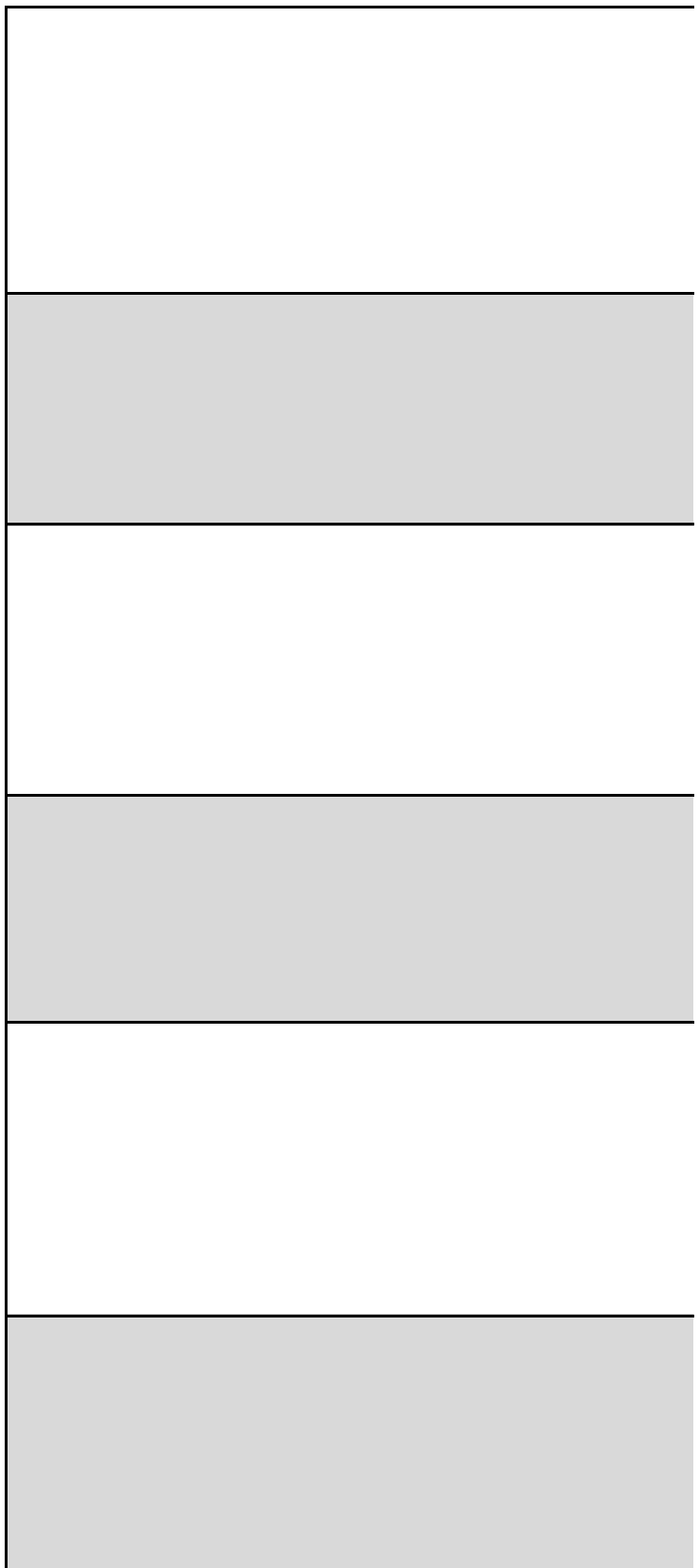
examples don't match with how you operate then edit as appropriate or delete all data in the row. You can add further processes to the bottom of the sheet

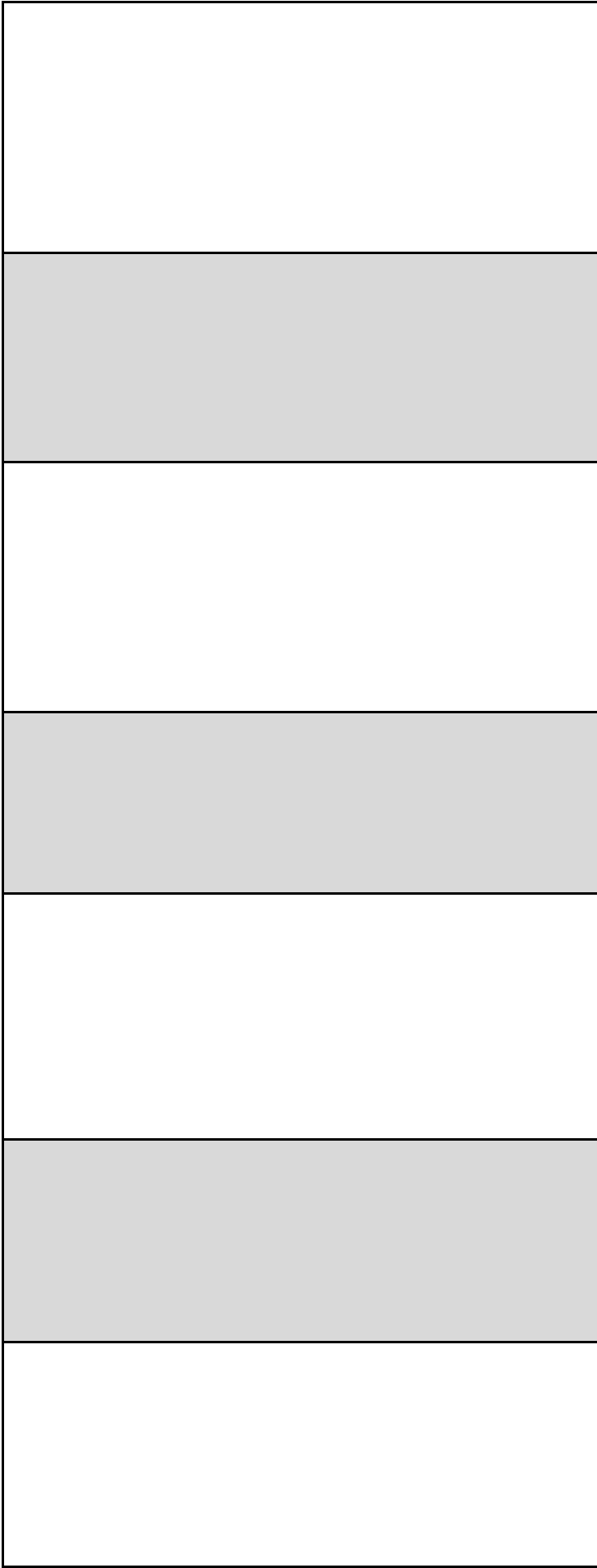
New Athlete joining - health records gathering	Inbound	Club Official
Coach training	Outbound	Coach
Coach Register	Inbound	Coach
Competition entry	Outbound	Club Official or Coach
Annual club survey	Outbound	Club Official
Transfer of athlete/coach/club official data between committee members	Outbound	Club Official
Newsletter communications	Outbound	Club Official

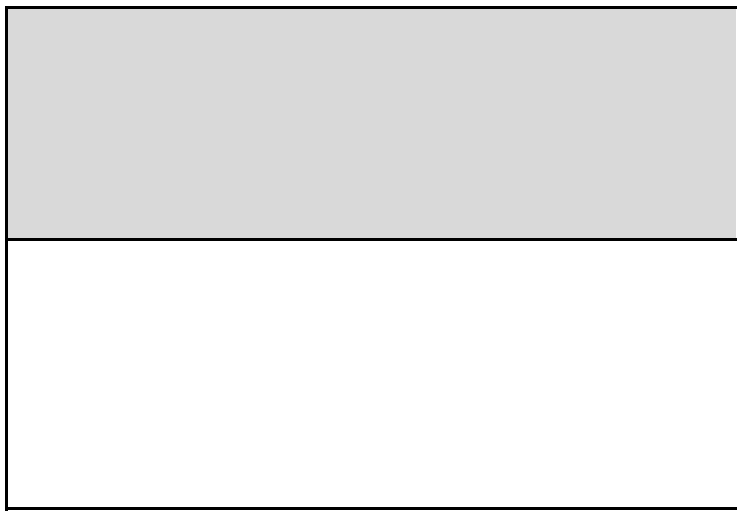
Marketing promotions	Outbound	Club Official
Social media	Inbound	Club Official
Fundraising individuals	Inbound	Club Official
Fundraising events	Inbound	Club Official
Social Events	Inbound	Club Official
Digital Imagery	Inbound	Club Official
Athlete leaver	Outbound	Club Official











DATA INVENTORY

DESCRIPTION	WHAT	WHO
What is the Process activity	Personal or Sensitive	Who can access the data
A description of the process with as much detail as possible	Is the data in this process personal or sensitive. Personal data is name, d.o.b, address etc.. And sensitive data is health records, religion etc..	During this process who has access to this data, select all that apply. If other is selected add further detail to the comments column
A new club is being affiliated and as part of this affiliation you gather personal data of the Club Officials, volunteers and coaches who will run the new club	PERSONAL	<input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
The process for onboarding a new club official includes the collection of the officials personal data.	PERSONAL	<input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
A new athlete joining completes a joiners form Membership form and this information is passed to the Club Officials. This contains detail of the athlete and the parents if under 18. The club official then registers this data with England Athletics using the Club Secretary Portal.	PERSONAL	<input type="checkbox"/> Club Official <input checked="" type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
A new athlete joining completes a joiners form Membership Form and this information is passed to the Club Officials. This contains detail of the athlete and the parents if under 18.	PERSONAL	<input checked="" type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...

<p>In addition to the Personal Data above health care records are captured as the Athlete joins.</p>	<p>SENSITIVE PERSONAL</p>	<p><input checked="" type="checkbox"/> Club Official <input checked="" type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...</p>
<p>Coaches receive personal data of athletes they are training as well as sensitive data which allows them to tailor their sessions and provide any extra support.</p>	<p>SENSITIVE PERSONAL</p>	<p><input checked="" type="checkbox"/> Club Official <input checked="" type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...</p>
<p>The coach will gather personal data on the individuals attending a session and record this on a register.</p>	<p>PERSONAL</p>	<p><input type="checkbox"/> Club Official <input checked="" type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...</p>
<p>The coach or club official will gather personal data on the individuals entering the competition.</p>	<p>SENSITIVE PERSONAL</p>	<p><input checked="" type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input checked="" type="checkbox"/> Parent <input type="checkbox"/> Other...</p>
<p>The club sends out a annual survey to the members over 18 and the parents for the younger members. The survey uses the email contact details of the targets and then requests them to provide more personal data as part of the survey.</p>	<p>NA</p>	<p><input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...</p>
<p>The committee members receive personal and sensitive data on the athletes and the services being delivered on an annual basis. This information is used to understand the membership status and to evaluate the effectiveness of the club.</p>	<p>SENSITIVE PERSONAL</p>	<p><input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...</p>
<p>Newsletters are sent to the parents and older athletes on a (ENTER FREQUENCY) basis. This is via emails using {a third party mass mailer}{email account}. This newsletter contains information about upcoming events, competition results and fundraising initiatives relating to membership with the club.</p>	<p>NA</p>	<p><input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...</p>

<p>The club has a number of partner organisations that offer relevant services and discounts. The club informs parents and athletes of these through {email mass mailers.}{direct email.}</p>	<p>NA</p>	<input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
<p>Parents and athletes are connected to the clubs social channels. As part of this channel we share personal data with the group and wider social platform, such as photographs and names.</p>	<p>PERSONAL</p>	<input checked="" type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input checked="" type="checkbox"/> Parent <input checked="" type="checkbox"/> Other...
<p>The club has a number of individual givers who donate to the club on a regular basis through direct debits.</p>	<p>NA</p>	<input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
<p>Fundraising events are held throughout the year to attract donations for the club to help with equipment purchases and general club administration.</p>	<p>NA</p>	<input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
<p>The club organise and manage a number of social events throughout the year for the club officials, coaches, parents and athletes.</p>	<p>PERSONAL</p>	<input type="checkbox"/> Club Official <input checked="" type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input checked="" type="checkbox"/> Other...
<p>At competitions, sessions and events, the club capture digital imagery of the athletes, coaches and parents for use on the media channels.</p>	<p>PERSONAL</p>	<input checked="" type="checkbox"/> Club Official <input checked="" type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
<p>There is a defined process for when an athlete leaves the club to make sure their data is secure and retained only as long as necessary.</p>	<p>PERSONAL</p>	<input checked="" type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...

There is a defined process for when a club official leaves the club to make sure their data is secure and retained only as long as necessary.	PERSONAL	<input checked="" type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
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The club maintains a waiting list of potential athletes wanting to join the club. This list contains contact details of the athlete and their parents so they can be contacted when a space is available.	NA	<input type="checkbox"/> Club Official <input type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
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Records of your involvement in a particular competition, on team sheets, on results pages. We will data to maintain records of performances, including competitions and match reports, and club team competitions.	PERSONAL	<input checked="" type="checkbox"/> Club Official <input checked="" type="checkbox"/> Coach <input type="checkbox"/> Athlete <input type="checkbox"/> Parent <input type="checkbox"/> Other...
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HOW **WHERE**

How is this data received/transferred Where is this data stored

As part of this process how is the data received or transferred, select all that apply. If **other** is selected add further detail to the comments column

As part of this process where is the data stored, select all that apply. If **other** is selected add further detail to the comments column

<input type="checkbox"/> Paper Form	<input type="checkbox"/> G-Suite	<input type="checkbox"/> Paper Form	<input type="checkbox"/> Lap/Desktop
<input type="checkbox"/> Web Form	<input type="checkbox"/> MS Office	<input type="checkbox"/> OneDrive	<input checked="" type="checkbox"/> Secretary Portal
<input type="checkbox"/> E-Mail	<input type="checkbox"/> Social Media	<input type="checkbox"/> Dropbox	<input type="checkbox"/> Other...
<input type="checkbox"/> SurveyMonkey	<input type="checkbox"/> Other...	<input type="checkbox"/> GoogleDrive	
<input type="checkbox"/> SurveyGizmo		<input type="checkbox"/> E-Mail	

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<input type="checkbox"/> SurveyGizmo		<input type="checkbox"/> E-Mail	

- Paper Form
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- E-Mail
- SurveyMonkey
- SurveyGizmo

- G-Suite
- MS Office
- Social Media
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- Paper Form
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- Lap/Desktop
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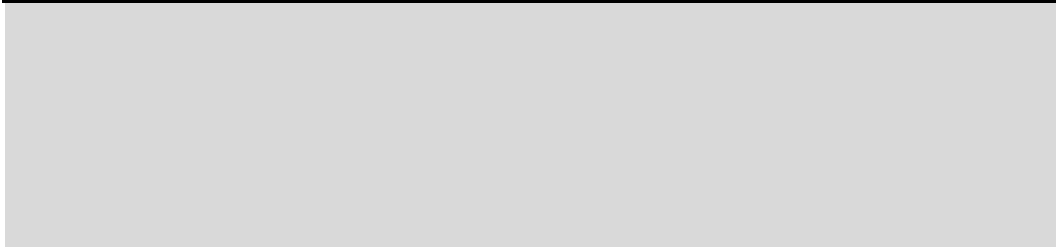
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WHY	WHEN
Purpose for Process	How long is data kept
What is the reason for the process, give as much detail as possible to demonstrate there is a justified reason to gather/transfer personal data	It is important to understand and document how long you will keep personal data as part of this process, this needs to be justified. The below are examples for the process
This process is required to enable the creation of a new club and to have it affiliated with England Athletics	Personal Data of the Club Officials and volunteers will be kept for 6 years post leaving the club, this is guidance from the Sports and Recreation Alliance.
As part of ongoing club management this process allows the joining of new club officials. The individuals personal data is required administer their contract with us and to ensure they are suitable for the role	Personal Data of the Club Officials and volunteers will be kept for 6 years post leaving the club, this is guidance from the Sports and Recreation Alliance.
When a new athlete joins they are required to provide their personal data to administer any membership they have with us and managing our relationship with them, including dealing with payments and any support, service or product enquiries made by them. This information is transferred to England Athletics for the purposes of affiliation and to attend registered events.	Personal data of the athlete and parent will be kept for 4 years after they have left the club.
When a new athlete joins they are required to provide their personal data to administer any membership they have with us and managing our relationship with them, including dealing with payments and any support, service or product enquiries made by them.	Personal data of the athlete and parent will be kept for 4 years after they have left the club.

<p>When a new athlete joins they are required to provide their sensitive data health records to be able to provide them coaching that is appropriate for their needs and so that the coaching staff are aware of any existing medical conditions.</p>	
<p>The athletes sensitive data will be transferred to the coach delivering the training for the purposes of tailoring the session to their needs and for registration of the individuals participation.</p>	<p>A coach will hold sensitive personal data for the period they are training the athlete for and then delete this data when they are no longer training this individual</p>
<p>The coach will collect personal data from the athletes at the point of registering for a session or competition.</p>	<p>The personal data gathered as part of a session register will be deleted at the end of the session with the coach</p>
<p>The athletes personal and sensitive data will be passed to the competition event provider for the purposes of registration and catering for any health and safety or disability concerns.</p>	<p>The registration detail gathered for competition entry will be transferred to the athletes training record and retained as part of the personal data above. The competition provider will retain this detail for (ADD DETAIL HERE OF COMPETITION PROVIDER RETENTION)</p>
<p>The personal data of the parents will be captured as part of an annual survey on how the club is performing, this information will be used for trending performance of the club and introducing improvements.</p>	<p>The personal data will be kept for the period of 1 year and then deleted. This data is then anonymised and retained for an indefinite period for statistical analysis.</p>
<p>Committee members will be in receipt of athletes, adult volunteers and club official personal and sensitive data for the purpose of reporting the clubs performance. This information is used to recognise areas the club can improve upon and what impact they are having on the athletes.</p>	<p>The personal and sensitive data used is the same as gathered during the joining process and as such is susceptible to the same 4 year retention period.</p>
<p>Personal data is {transferred to a third party mass mailer provider (ENTERNAME)}, via email used} for the purposes of sending a club newsletter to the parents and athletes.</p>	<p>{The personal data is held with the third party provider of mass mailing until the individual leaves the club. It is then deleted} {The personal data is the same as gathered during the joining process and as such is susceptible to the same 4 year retention period.}</p>

Personal data is {transferred to a third party mass mailer provider (ENTERNAME)}{,via email used} for the purposes of sending a club newsletter to the parents and athletes.	{The personal data is held with the third party provider of mass mailing until the individual leaves the club. It is then deleted} {The personal data is the same as gathered during the joining process and as such is susceptible to the same 4 year retention period.}
The club social channels are used to promote the club, inform our members of events, competitions and news along with publicising members achievements	The personal data shared on our social channels is kept within the social platform until an individual requests it be removed
Personal data is collected from individual givers who donate on a regular basis to the club, this is for the purposes of gift aid claims	Personal data on the individual giver will be deleted 7 years post the last contribution for the purposes of Gift Aid claims
Personal data is gathered from fund raising events of donors or potential donors who are funding the club. This data is required to contact these individuals and to complete gift aid claims	Personal data on the individual giver will be deleted 7 years post the last contribution for the purposes of Gift Aid claims
Personal data is gathered as part of organising attendees to social events. This data will be used for event registration and capacity planning	Personal data gathered for the purposes of event participation will be deleted 1 month after the event to allow for any queries that may arise post the event
Digital imagery of athletes and parents is captured at competitions and training sessions to be used as part of the clubs digital presence, this includes the website, social channels and newsletters	Data imagery is used as a records of an athletes involvement in a particular competition, on team sheets, on results pages or in sports reports, photography or video coverage may be held indefinitely both by us, sports governing organisations and our partners in order to maintain a record of the sport. Where this data is published or broadcast it will no longer be subject to our control. Consent will be used to justify the images being taken in the first instance.
As part of an athlete leaving the personal and sensitive data held on this individual is maintained for 4 years post leaving. This allows an individual to re-join and maintain their history with us.	As part of an athlete leaving the personal and sensitive data held on this individual is maintained for 4 years post leaving. It is then deleted. 4 years is the average time an individual re-joins based on England Athletics analytics.

As part of a club official leaving their personal data is maintained for 1 year for any queries they have for us or us with them.

Personal data on a club official is deleted 1 year after they leave to allow for us to communicate with them for any final queries that may arise.

Waiting lists are maintained of athletes waiting to join the club. This contains personal data of the athlete and parent for the purposes of understanding what kind of place they require and how to contact them

Personal data of athletes and their parents is maintained on waiting lists for 2 years or until they are accepted into a club as a member, whichever is shorter.

The publication of results is intrinsic to the activity concerned – athletics and running competition itself, by its nature, requires a result and for those involved to understand who has participated and beaten each other.

Keep indefinitely: The right to erasure does not apply if processing is necessary for statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing.





















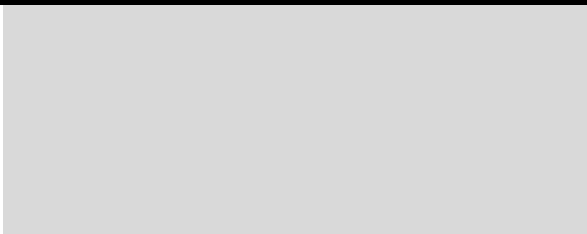




COMMENTS

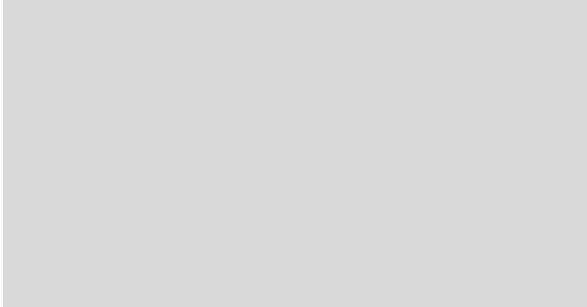
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Where **other** has been selected or further detail is required for this process, add it here. It is good to add as much detail as possible to justify the process



Social photography, publishing themselves and others on that channel

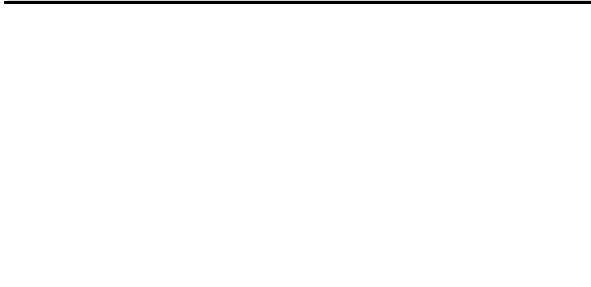
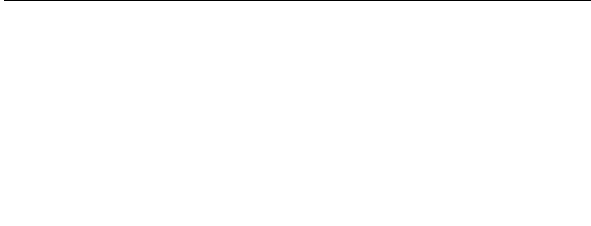
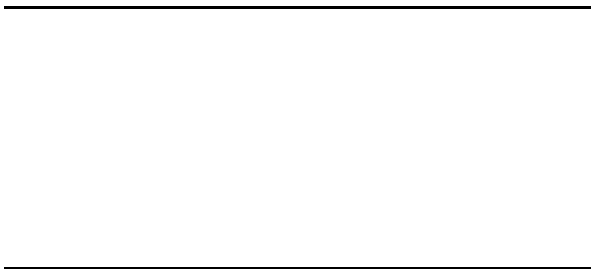
Add detail as to why personal and reflect legal basis. Spilt process in 2 for sensitive and personal



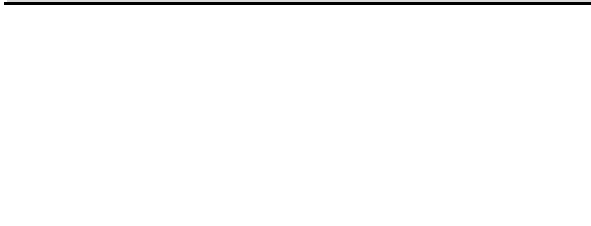


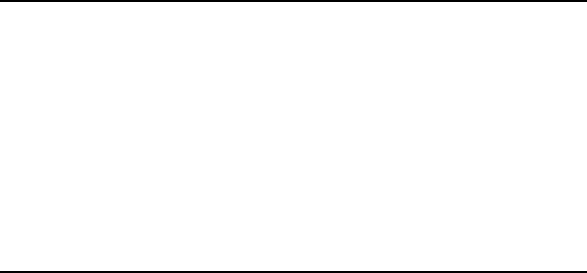
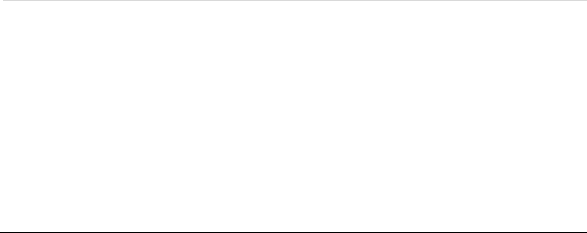
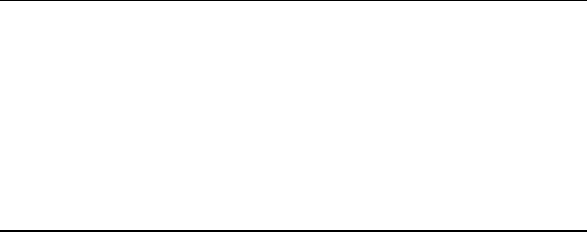
NOTE FROM EDITOR - There is the potential to reduce the sensitive data retained at the club by having the coach request details on existing health conditions as part of the session.

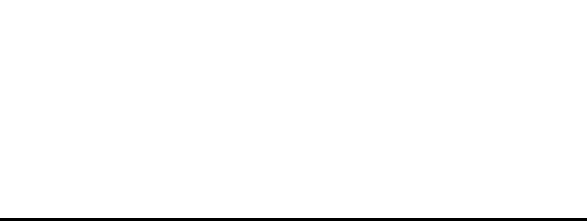




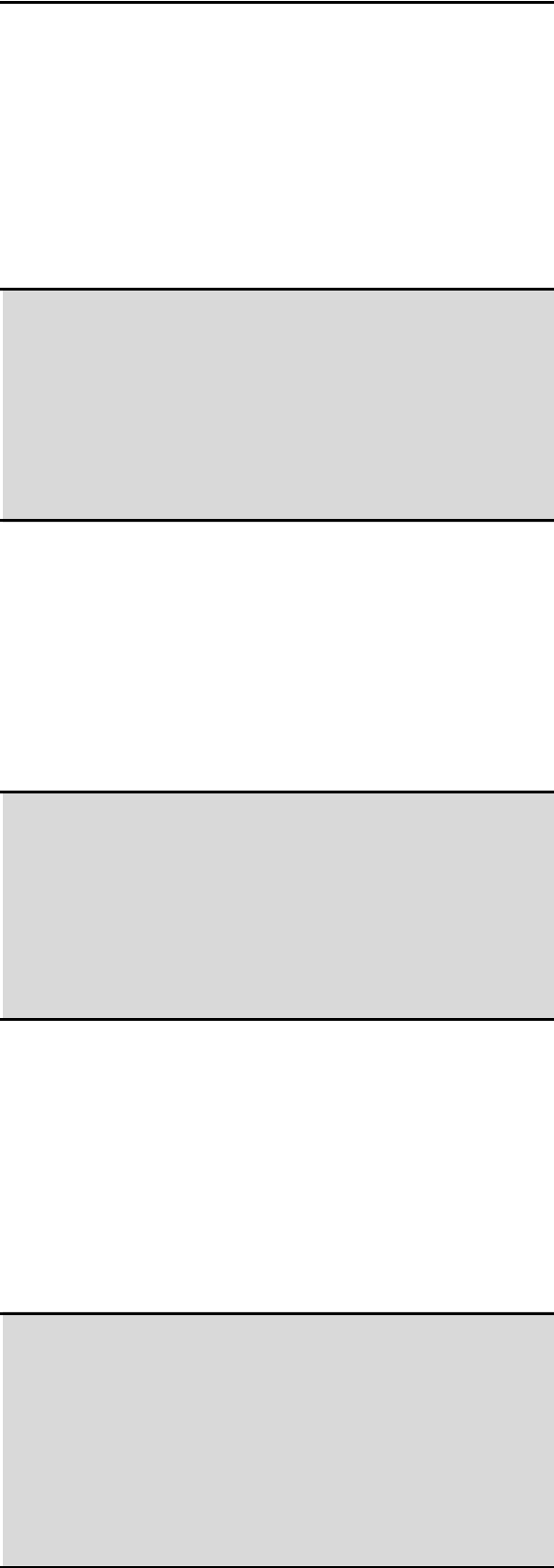
Guidance on photos, groups shots, social, existing images in library and on site, consent on registration

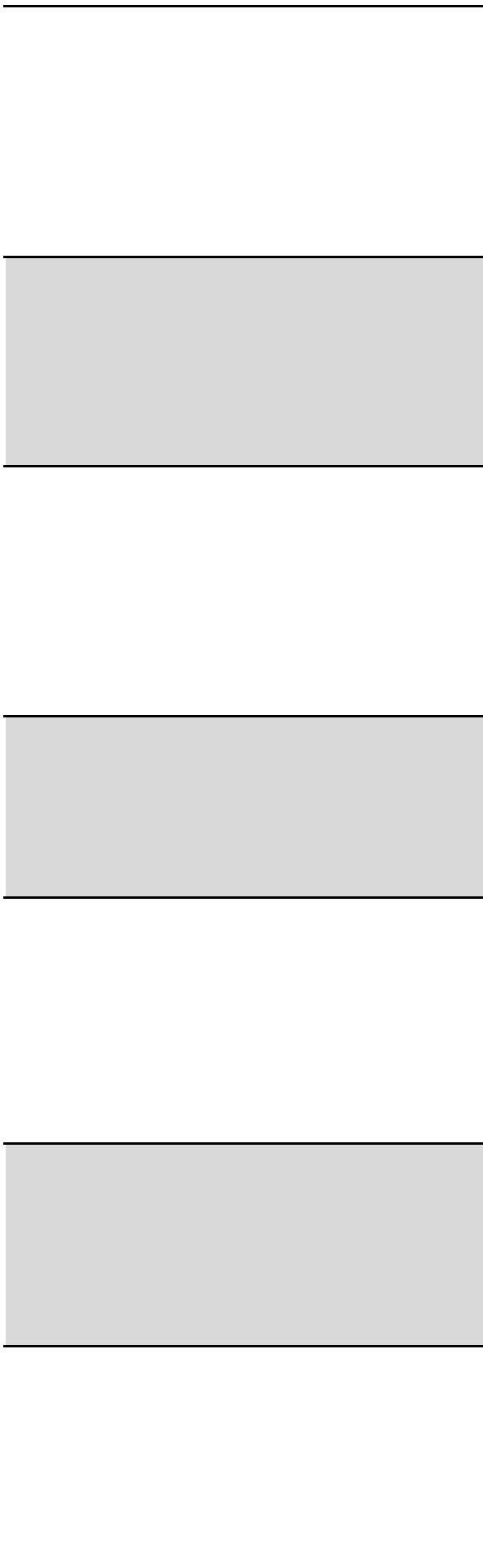


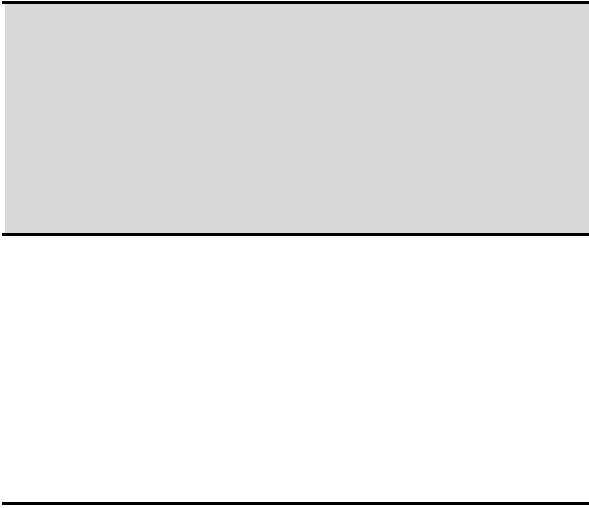












BLACKPENNY

PURPOSE : The purpose of this form is to capture the security provisions that exist for the data capture/transfer and storage used today within your club

[Please watch this video in advance of completing this sheet.](#)

this form is fully open for edits. If the examples don't match with how you operate then edit as appropriate or add further media process to the bottom of the sheet

DATA PROCESS MEDIA	DATA STORAGE
This is the data process media used for capture/transfer or storage of personal data	Data Storage is where the data is stored for further use
Paper Form	Paper based forms are stored in the club officials home filing cabinet
Web Form	Data is captured by the online form and stored in the website database
E-Mail	Data is sent in via email as part of the joiners process. This is retained in club email
Club Secretaries Portal/ MyAthletics Portal	Portals is used to collect the Sensitive Personal Data of athletes and coaches.
Microsoft Office	Data is captured via a Microsoft Word Document

DATA SECURITY

SECURITY	VENDOR
Add as much detail as possible as to the security measures in place for the protection of the personal data for this media	Who is the vendor of this media process if applicable
Filing cabinet is locked and can only be accessed by the club official	NA
The web form is protected by front end encryption (SSL) and the database is encrypted	The website is hosted by {INSERT VENDOR} and is a {ENTER TYPE OF WEBSITE, E.G. WORDPRESS} site
The email requires a username and password, it is also stored locally on a laptop that requires local logon with a Strong password	Fasthosts UK
Portals requires a username and password to access and uses a secure transfer mechanism (SSL)	England Athletics
The Word Doc is filled in directly by the recipient and emailed back to me. This communication is direct between the sender and recipient	Microsoft

The social media platform has a requirement for username and password, it also uses SSL for encryption and all messages are Direct Messaging which is private	Social Media Provider
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EVENT ORGANISER requires a username and password for access with a Strong password policy. EVENT ORGANISER

DESCRIPTION

Give a good description as the use of this media the considerations made for alternatives and justify why it is the right choice

Paper records are gathered as part of the joining process for athletes and coaches. This detail is retained on paper and stored at the residential premises of the club official. These papers come with the club official to competitions and events.

The website is hosted by {INSERT VENDOR} and is a {ENTER TYPE OF WEBSITE, E.G. WORDPRESS} site and form. The data held in this website is in an encrypted database that limited and named individuals have access to.

The joiners process requires the athlete/parent to email me Sensitive Personal Data. This data is retained within my email system, which is managed by a Third Party Processor in the cloud. I also store my emails locally and don't delete them.

The portals are a Membership Management tool controlled by England Athletics. It requires user credentials to logon and uses SSL based encryption when I have access to data

The Word Doc is the capture mechanism for data gathering. This is via an email exchange and stored locally on my laptop.

Social media is used to connect with the athletes and parents of the athletes. Personal Data is shared as part of club publicity within the platform

EVENT ORGANISER is used to organise events with Parents, athletes and coaches .

RISKS

Highlight any risks you can see that the use of this media brings. If they are significant and need to be tracked then add them to the risk register also

Significant risk of loss or theft of Sensitive Data. The ability to update is also limited

The database is an aggregated source of Sensitive Data and as such is a threat target. Care should be taken to secure this

Email is an unsecure mechanism for sending plain text details. It should also only be retained for the period of transfer and added to a Membership Management System as early as possible

England Athletics is a Joint Data Controller with the Club Officials when it comes to athletes and coaches sensitive and personal data. Joint Data Controller puts obligations on both parties that they should both be very clear about

The local laptop becomes an aggregated source of Sensitive Data. The security and continuity of this device needs to be considered

Social media platforms have large amounts of aggregated data and as such are targets. In addition, the platform is now a Third Party Processor and care should be taken to understand their stance on GDPR and data privacy.

EVENT ORAGNISER is a Third Party Processor and is subject to the GDPR Checklist for alignment to the GDPR

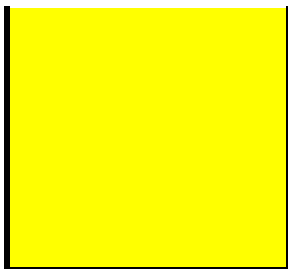
PURPOSE : The purpose of this form is to capture the lawful reason you are relying on for the data you are capturing / storing / transferring.

B L A C K P E N N Y

SYSTEM OR PROCESS	The name of the data owner
This is the system or process as identified in the Data Inventory Tab.	This will be the top level of the club, usually, club official
<i>New club official joining</i>	Welfare Officer
<i>New athlete joining and registering with England Athletics</i>	Membership Secretary

[Please watch this video in advance of completing this sheet.](#)

This form is mostly pre populated from the Data Inventory tab, these fields are in bold italics. All other fields are editable and require completing



<i>New athlete joining without registering with England Athletics</i>	Membership Secretary
<i>New Athlete joining - health records gathering</i>	Membership Secretary
<i>Coach training</i>	Lead Coach
<i>Coach Register</i>	Lead Coach
<i>Competition entry</i>	Race Manager
<i>Annual club survey</i>	N/A

<i>Transfer of athlete/coach/club official data between committee members</i>	All Committee
<i>Newsletter communications</i>	ENTER NAME OF RESPONSIBLE PERSON
<i>Marketing promotions</i>	ENTER NAME OF RESPONSIBLE PERSON
<i>Social media</i>	Website Manager
<i>Fundraising individuals</i>	ENTER NAME OF RESPONSIBLE PERSON

Fundraising events	ENTER NAME OF RESPONSIBLE PERSON
Social Events	Social Secretary
Digital Imagery	Social Media
Athlete leaver	Memembrship Secretary
Club Official Leaver	Membership and Club Secretary
Waiting lists	N/A

GDPR PROCESSING REC

The purposes of the processing;	A description of the categories of data subjects and of the categories of personal data;	Examples of the data captured that drives the data categorisation
This is the purpose for the processing as identified in the Data Inventory Tab	This is classification of the data in the process as identified in the Data Inventory Tab	Add the types of personal data involved in this process, add all that apply
<i>The process for onboarding a new club official includes the collection of the officials personal data.</i>	PERSONAL	Name, DOB, Address, e-mail address, phone number
<i>A new athlete joining completes a joiners form Membership form and this information is passed to the Club Officials. This contains detail of the athlete and the parents if under 18. The club official then registers this data with England Athletics using the Club Secretary Portal.</i>	PERSONAL	Name, DOB, Address, e-mail address, phone number

<p><i>A new athlete joining completes a joiners form Membership Form and this information is passed to the Club Officials. This contains detail of the athlete and the parents if under 18.</i></p>	<p>PERSONAL</p>	<p>Name, DOB, Address, e-mail address, phone number</p>
<p><i>In addition to the Personal Data above health care records are captured as the Athlete joins.</i></p>	<p>SENSITIVE PERSONAL</p>	<p>Name, Address, e-mail address, phone number, disabilities, health data</p>
<p><i>Coaches receive personal data of athletes they are training as well as sensitive data which allows them to tailor their sessions and provide any extra support.</i></p>	<p>SENSITIVE PERSONAL</p>	<p>Name, Address, e-mail address, phone number, disabilities, health data</p>
<p><i>The coach will gather personal data on the individuals attending a session and record this on a register.</i></p>	<p>PERSONAL</p>	<p>Name, e-mail address, phone number</p>
<p><i>The coach or club official will gather personal data on the individuals entering the competition.</i></p>	<p>SENSITIVE PERSONAL</p>	<p>Name, Address, e-mail address, phone number, disabilities, health data</p>
<p><i>The club sends out a annual survey to the members over 18 and the parents for the younger members. The survey uses the email contact details of the targets and then requests them to provide more personal data as part of the survey.</i></p>	<p>NA</p>	<p>Name, e-mail address, phone number</p>

<p><i>The committee members receive personal and sensitive data on the athletes and the services being delivered on an annual basis. This information is used to understand the membership status and to evaluate the effectiveness of the club.</i></p>	<p>SENSITIVE PERSONAL</p>	<p>Name, e-mail address, phone number</p>
<p><i>Newsletters are sent to the parents and older athletes on a (ENTER FREQUENCY) basis. This is via emails using {a third party mass mailer}{email account}. This newsletter contains information about upcoming events, competition results and fundraising initiatives relating to membership with the club.</i></p>	<p>NA</p>	<p>Name, e-mail address</p>
<p><i>The club has a number of partner organisations that offer relevant services and discounts. The club informs parents and athletes of these through {email mass mailers.}{direct email.}</i></p>	<p>NA</p>	<p>Name, e-mail address</p>
<p><i>Parents and athletes are connected to the clubs social channels. As part of this channel we share personal data with the group and wider social platform, such as photographs and names.</i></p>	<p>PERSONAL</p>	<p>Name, Photograph</p>
<p><i>The club has a number of individual givers who donate to the club on a regular basis through direct debits.</i></p>	<p>NA</p>	<p>Name, e-mail address, phone number, bank details</p>

<p><i>Fundraising events are held throughout the year to attract donations for the club to help with equipment purchases and general club administration.</i></p>	<p>NA</p>	<p>Name, e-mail address, phone number, bank details</p>
<p><i>The club organise and manage a number of social events throughout the year for the club officials, coaches, parents and athletes.</i></p>	<p>PERSONAL</p>	<p>Name, e-mail address, phone number</p>
<p><i>At competitions, sessions and events, the club capture digital imagery of the athletes, coaches and parents for use on the media channels.</i></p>	<p>PERSONAL</p>	<p>Craig Keating</p>
<p><i>There is a defined process for when an athlete leaves the club to make sure their data is secure and retained only as long as necessary.</i></p>	<p>PERSONAL</p>	<p>Name, DOB, Address, e-mail address, phone number</p>
<p><i>There is a defined process for when a club official leaves the club to make sure their data is secure and retained only as long as necessary.</i></p>	<p>PERSONAL</p>	<p>Name, DOB, Address, e-mail address, phone number</p>
<p><i>The club maintains a waiting list of potential athletes wanting to join the club. This list contains contact details of the athlete and their parents so they can be contacted when a space is available.</i></p>	<p>NA</p>	<p>Name, DOB, Parents e-mail address, parents phone number</p>

<p><i>Records of your involvement in a particular competition, on team sheets, on results pages. We will data to maintain records of performances, including competitions and match reports, and club team competitions.</i></p>	<p>PERSONAL</p>	<p>Name, DOB</p>
0	0	
0	NA	
0	NA	
0	NA	
0	NA	
0	NA	
0	NA	
0	NA	
0	NA	

CORDS

Where possible, the envisaged time limits for erasure of the different categories of data;	Lawful Process Article
<p>This is the retention period for the data in this process as defined in the Data Inventory Tab</p>	<p>The Lawful Process is the justification for the data process. This needs to be selected to match the applicable description in the table to the right</p>
<p><i>Personal Data of the Club Officials and volunteers will be kept for 6 years post leaving the club, this is guidance from the Sports and Recreation Alliance.</i></p>	<p>6(1)(b)</p>
<p><i>Personal data of the athlete and parent will be kept for 4 years after they have left the club.</i></p>	<p>6(1)(b)</p>

<p>Personal data of the athlete and parent will be kept for 4 years after they have left the club.</p>	<p>6(1)(b)</p>
<p>0</p>	<p>9(2)(a)</p>
<p>A coach will hold sensitive personal data for the period they are training the athlete for and then delete this data when they are no longer training this individual</p>	<p>9(2)(a)</p>
<p>The personal data gathered as part of a session register will be deleted at the end of the session with the coach</p>	<p>6(1)(b)</p>
<p>The registration detail gathered for competition entry will be transferred to the athletes training record and retained as part of the personal data above. The competition provider will retain this detail for (ADD DETAIL HERE OF COMPETITION PROVIDER RETENTION)</p>	<p>9(2)(a)</p>
<p>The personal data will be kept for the period of 1 year and then deleted. This data is then anonymised and retained for an indefinite period for statistical analysis.</p>	<p>6(1)(b)</p>

<p><i>The personal and sensitive data used is the same as gathered during the joining process and as such is susceptible to the same 4 year retention period.</i></p>	<p>6(1)(a)</p>
<p><i>{The personal data is held with the third party provider of mass mailing until the individual leaves the club. It is then deleted}</i> <i>{The personal data is the same as gathered during the joining process and as such is susceptible to the same 4 year retention period.}</i></p>	<p>6(1)(b)</p>
<p><i>{The personal data is held with the third party provider of mass mailing until the individual leaves the club. It is then deleted}</i> <i>{The personal data is the same as gathered during the joining process and as such is susceptible to the same 4 year retention period.}</i></p>	<p>6(1)(a)</p>
<p><i>The personal data shared on our social channels is kept within the social platform until an individual requests it be removed</i></p>	<p>6(1)(a)</p>
<p><i>Personal data on the individual giver will be deleted 7 years post the last contribution for the purposes of Gift Aid claims</i></p>	<p>6(1)(b)</p>

<p>Personal data on the individual giver will be deleted 7 years post the last contribution for the purposes of Gift Aid claims</p>	<p>6(1)(b)</p>
<p>Personal data gathered for the purposes of event participation will be deleted 1 month after the event to allow for any queries that may arise post the event</p>	<p>6(1)(b)</p>
<p>Data imagery is used as a records of an athletes involvement in a particular competition, on team sheets, on results pages or in sports reports, photography or video coverage may be held indefinitely both by us, sports governing organisations and our partners in order to maintain a record of the sport. Where this data is published or broadcast it will no longer be subject to our control. Consent will be used to justify the images being taken in the first instance.</p>	<p>6(1)(a)</p>
<p>As part of an athlete leaving the personal and sensitive data held on this individual is maintained for 4 years post leaving. It is then deleted. 4 years is the average time an individual re-joins based on England Athletics analytics.</p>	<p>6(1)(b)</p>
<p>Personal data on a club official is deleted 1 year after they leave to allow for us to communicate with them for any final queries that may arise.</p>	<p>6(1)(b)</p>
<p>Personal data of athletes and their parents is maintained on waiting lists for 2 years or until they are accepted into a club as a member, whichever is shorter.</p>	<p>6(1)(f)</p>



Lawful Process Description	Approved by and when
The description that matches the Lawful Process Article will be auto populated when you select the appropriate article ID	Add the approver of this Lawful process from the club officials and date of approval
<i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i>	TBA
<i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i>	TBA

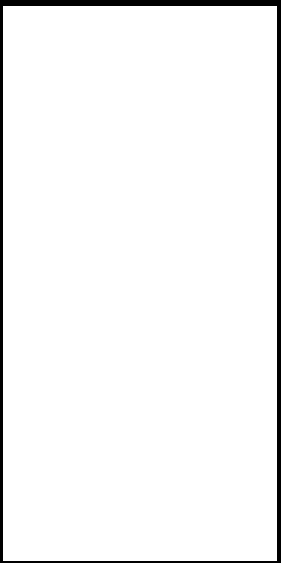
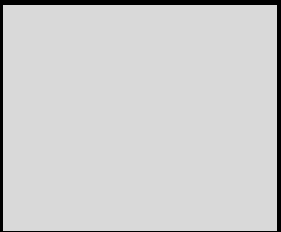
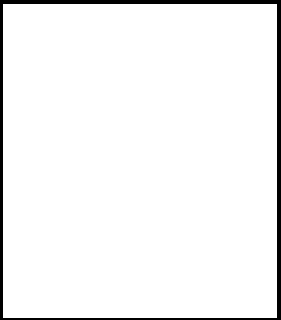
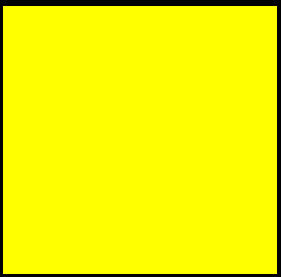
<i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i>	TBA
<i>Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law</i>	TBA
<i>Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law</i>	TBA
<i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i>	TBA
<i>Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law</i>	TBA
<i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i>	TBA

<i>Consent of the data subject</i>	
<i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i>	
<i>Consent of the data subject</i>	
<i>Consent of the data subject</i>	
<i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i>	Performance contract

<p><i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i></p>	
<p><i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i></p>	
<p><i>Consent of the data subject</i></p>	
<p><i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i></p>	
<p><i>Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract</i></p>	
<p><i>Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject</i></p>	



Comments



Data Type	Lawful Process Article
Personal Data	6(1)(a)
Personal Data	6(1)(b)
Personal Data	6(1)(c)
Personal Data	6(1)(d)

Fulfilling duties, like membership enquiries et

Personal Data	6(1)(e)
Personal Data	6(1)(f)
Sensitive Personal	9(2)(a)
Sensitive Personal	9(2)(b)
Sensitive Personal	9(2)(c)
Sensitive Personal	9(2)(d)

t

Sensitive Personal	9(2)(e)
Sensitive Personal	9(2)(f)
Sensitive Personal	9(2)(g)
Sensitive Personal	9(2)(h)
Sensitive Personal	9(2)(i)

Sensitive Personal	9(2)(j)
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Lawful Process Description	General Description and example
Consent of the data subject	The individual who's personal data is in question has given you consent to carry out the process
Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract	The personal data on the individual is necessary for a contract purpose, such as data required to fulfil a warranty when purchasing an item
Processing is necessary for compliance with a legal obligation	Legal obligations supersede GDPR where appropriate, this could include things such as DBS checks
Processing is necessary to protect the vital interests of a data subject or another person	An example of vital interests would be retaining somebodies details post a purchase in case of product recall

<p>Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>	<p>The data held is required to perform duties of public interest, such as reporting crimes</p>
<p>Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject</p>	<p>Legitimate interest is where your requirement to have data overrides objections from the data subject, such as data pertaining to safeguarding</p>
<p>Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law</p>	<p>Where sensitive data is involved explicit consent is required from the data subject or parental guardian, such as medical records</p>
<p>Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement</p>	<p>Where sensitive data is required to fulfil an obligation with an employee, such as health details for a pension</p>
<p>Processing is necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent</p>	<p>The vital interests of the subject require you to have this data, such as allergies for dietary requirements</p>
<p>Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent</p>	<p>Necessary for the processing of data as part of a Not For Profit organisation based on a philosophical, religious, political trade union aim</p>

<p>Processing relates to personal data manifestly made public by the data subject</p>	<p>This information is already in the public domain and published by the data subject</p>
<p>Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity</p>	<p>To fight legal claims on the data subjects behalf this information is required</p>
<p>Processing is necessary for reasons of substantial public interest on the basis of Union or Member State law which is proportionate to the aim pursued and which contains appropriate safeguards</p>	<p>Substantial public interest may be informing authorities of an individual that poses a threat.</p>
<p>Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional</p>	<p>The sensitive data is required to assess the individuals ability to carry out their duties and respond to their medical needs if necessary</p>
<p>Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of healthcare and of medicinal products or medical devices</p>	<p>Substantial public interest may be informing authorities of an outbreak of a contagious disease, sensitive data will be required for this</p>

<p>Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)</p>	<p>The sensitive data is required to maintain records that are required for research purposes and historical importance</p>
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THIRD PARTY PROCESSOR CHECKL

DETAIL

Enter as much detail as possible on what the service is that is provided by the third party

Cloud Storage for non sensitive data

Analytics drawn from Google Search Engine and Ad Words

Office application suite excluding OneDrive Cloud Storage

Club Committee Members Email Addresses

Membership Management platform for clubs and athletes

Activity provided by third party who need the personal data of attendees

Hosting platform for the DAAC Website

public relations and club promotion

public relations and club promotion

public relations and club promotion

IST

RETENTION PERIOD	CONTRACT RENEWAL DATE	INCIDENT REPORTING PROCESS
Specify the period of time the third party will have access to the data	Enter the date for the contract renewal with the third party	Do the third party have a robust incident reporting process
Undefined	Unknown	Yes
Undefined	Unknown	Yes
Undefined	Unknown	Yes
undefined	18/11/2020	Yes
Undefined	Unknown	No
Undefined	Unknown	No
undefined	18/11/2020	Yes
undefined	unknown	Yes
undefined	unknown	Yes
undefined	unknown	Yes



GDPR COMPLIANT	Notes
Have you had confirmation from the third party that they are GDPR Compliant. If not they should be issued the Third Party Processor Checklist to complete	Notes
CONFIRMED	
CONFIRMED	
CONFIRMED	
CONFIRMED	
CONFIRMED	
UNCONFIRMED	
CONFIRMED	
CONFIRMED	
CONFIRMED	
CONFIRMED	

BLACKPENNY

PURPOSE : The purpose of this form is to capture the risks identified as part

[Please watch this video in advance of completing this sheet.](#)

This form currently contains examples that may or not be applicable for you. Review and edit as appropriate

RISK No	FUNCTIONAL AREA	OWNER
Number identifier for the risk	The area of the club that the risk applies to	The owner of the risk and its mitigation
1	Club Officials	TBC
2	Club Officials	TBC
3	Club Officials and coaches	TBC
4	Club Officials and coaches	TBC
5	Club Officials and coaches	TBC
6	Club Officials	
7	Club Officials	
8	Club Officials	TBC
9	Club Officials	TBC

10	Club Officials	TBC
11		
12		
13		
14		
15		
16		
17		
18		

RISK REGISTER

RISK	RATING
Give a good description of the risk so it is clear what it actually is	Rate the risk based on its impact
Third Party Processor may refuse to or not be able to demonstrate GDPR compliance	MEDIUM
Maintain records of Lawful Processing at data capture source is mandated to be on going	MEDIUM
Local laptops holding Sensitive Personal Data do not have "Strong" passwords - Strong = 8 characters or more, mixture of letters, numbers and special characters	HIGH
No local encryption for local laptops holding Sensitive Personal Data	MEDIUM
Paper based records are kept in a variety of locations that contain Sensitive Personal Data	HIGH
If the Data Subject (athlete, parent, coach, donor) request their detail to be deleted/changed/reported on it will be difficult to ensure data corrected in multiple data sources	HIGH
Documentation for IT Systems in use across the club is very low	HIGH

All data captured is kept forever with no defined policies for retention of this data

HIGH



RECOMMENDATION	COST	STATUS
Add a detailed description of the recommendation for managing / mitigating the risk. This isn't necessarily the mitigation, merely an idea of what is possible	Indication of any cost impact for mitigation	Give the risk a status dependent on its mitigation
Work with suppliers that are aligning with the GDPR and can demonstrate alignment to the GDPR. Alternative is to accept as a business risk	NA	COMPLETED
Review data repositories and develop a method for maintaining evidence of Lawful Processing. This register acts as the evidence but requires updating when things change within the club	NA	OPEN
Implement a local password on the laptops that meets the Strong password criteria	NA	COMPLETED
Laptops have the ability to store personal data locally, this should be protected in case of loss or theft by encryption		OPEN
Review the requirement to hold paper based records. Where possible replace this with an electronic means, such as online webforms, membership management platform or a cloud based office application. Where it is required, store printed paper records in physical and lockable cabinets and store for only as long as required	Low	OPEN
Use the journey detail captured in this register for the athlete, coach, parent, donor to review the data stores in use and look to minimise where it makes sense. Where a Third Party Processor is in use, check their alignment to the GDPR to assist with such requests, review again upon their response	NA	PENDING REVIEW
Use this GDPR Register to start a documentation pack on the IT estate.	£150	OPEN

Review the data sources and categories highlighted in the Data Inventory and align an appropriate and justified retention policy to each, this should match the retention periods defined in the privacy notice, England Athletics have supplied templates that can assist: https://www.englandathletics.org/clubs--community/club-management/gdpr-and-data-protection-advice	NA	OPEN
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Mitigation

Describe the mitigation that has been chosen for the risk in as much detail as possible

All processors are GDPR compliant. Only GDPR compliant event management systems to be used.

Central data repository to used where possible England Athletics. Information outside of this to be an agrees Microsoft or Google platform with access only given to Committee Email addressed committee members. Where possible information shared direct from the cloud and not via email attachment.

All club laptops already have the requirement to utilise strong passwords as standard.

Purchase Laptop Encryption software inline with IT information below

Consider online applications only and paper would only be used for those with no internet access. On transfer to the England Athletics Portal paper form to be Shredded.

Look to moving to one system England Athletics to manage all aspects of personal Data. Provide membership secretary with a google chromebook that remains the ownership of DAAC complete SyOPS which is signed about acceptable use.

Review of practices involving IT across the club to see how peoples information is stored/accessed. Maybe the requirement to supply members with club owned ifrastructure

B L A C K P E N N Y

PURPOSE : The purpose of this form is to capture the Privacy Notices that are required at the various data capture points to inform individuals of what, why, when with regards to their data

[Please watch this video in advance of completing this sheet.](#)

this form currently contains examples

NAME	ISSUE DATE
Give the Privacy Notice a name to identify it	The date the Privacy Notice has been issued
Paper based joiners form	01/04/2020
Web based joiners form	Apr-20
Club Website	May-20

PRIVACY NOTICE REGISTER

LOCATED	NOTES
Where is this Privacy Notice located	Add detail on the current status of the Privacy Notice, specifically if you need to update it to align to the GDPR
On paper based joiners forms for athletes and coaches	The existing Membership for has consent for all areas of GDPR and a full disclosure on what we do with members personal data.
On web based joiners forms for athletes an coaches	Club Privacy notice available on all pages of the club website. Consent is given as part of the process via a tick box
Website footer on all pages	privacy notice available on all pages



GDPR READY	DATE WITHDRAWN
-----------------------	-----------------------

Is it GDPR ready as is	If not then what date was It withdrawn
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Yes	
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Yes	
-----	--

Yes	
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Are there any wider public benefits to the processing
How important are those benefits?
What would the impact be if you couldn't go ahead
Would your use of the data be unethical or unlawful

Second, apply the necessity test. Consider:

Does this processing actually help to further that interest?
Is it a reasonable way to go about it?
Is there another less intrusive way to achieve the same purpose?

Third, do a balancing test as above. Consider the impact on the individual.

Can you offer an opt-out?

?

?

in any way?

est?

ie result?

fact of your processing and whether this overrides the interest you have identified.



Number of data subjects affected	Number of personal data records affected	Likely consequences of the Breach
How many data subjects / individuals were involved	How many records of the data subjects were involved	What might happen now this data is breached

