



QUALIFICATION POLICY

DATA PROTECTION POLICY & PRIVACY NOTICE FOR CANDIDATES

Scope

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your interaction with us. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This Notice applies to all companies in our Group of companies. References to we, our or us in this privacy notice are to GBWR Group (Great Britain Wheelchair Rugby Limited and GBWR Trading Limited).

This Notice applies to you if you are a coach, technical official, volunteer, classifier, table official or referee who has registered to find out more about or partake in the training courses and accreditation services we offer. References to “you”, “yourself” and “your” are to each individual to whom this Notice applies.

The Data Protection Act 1998 (“DPA”) applies to any personal data that we process, and from 25th May 2018 this will be replaced by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (“DPA 2018”) (together “data protection laws”) and then after Brexit the UK will adopt laws equivalent to these data protection laws. This Policy is written as though GDPR and the DPA 2018 are both in force, i.e. it states the position as from 25th May 2018. The data protection laws all require that the personal data is processed in accordance with the Data Protection Principles and gives individuals rights to access, correct and control how we use their personal data.

Personal data is data that relates to a living individual who can be identified from that data (or from that data and other information in or likely to come into our possession). That living individual might be an employee, member, coach, athlete, supplier, contractor or contact, and that personal data might be written, oral or visual (e.g. CCTV).

The main themes of the data protection laws are:

- good practices for handling personal data;
- rights for individuals in respect of personal data that data controllers hold on them; and
- being able to demonstrate compliance with data protection laws.

In summary, the data protection laws require us to:

- only process personal data for certain purposes;
- process personal data in accordance with the 6 principles of ‘good information handling’ (including keeping personal data secure, processing it fairly and in a transparent manner and keeping it for no longer than is required);
- provide certain information to those individuals about whom we process personal data which is usually provided in a privacy notice, for example you will have received one of these from us as one of our staff;
- respect the rights of those individuals about whom we process personal data (including providing them with access to the personal data we hold on them); and

Qualification Policy

Data Protection Policy & Privacy Notice for Candidates

Great Britain Wheelchair Rugby



- keep adequate records of how data is processed and, where necessary, notify the regulator and possibly data subjects where there has been a data breach.

References to wheelchair rugby in this Notice are to the Paralympic discipline, the Wheelchair Rugby 5s discipline and the Junior Wheelchair Rugby discipline.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Compliance & Membership Officer has overall responsibility for data protection compliance in our organisation.

It is ultimately the responsibility of the Head of the Centre, David Pond, to ensure that this policy is published, accessible and implemented across all personnel, learners and by any relevant third parties. However, the Qualification Coordinators (QCs) specific to each qualification are responsible for ensuring this information is fully understood by their qualification team and also by the learners who commence courses/programmes in their area.

Contact details are set out in the "Contacting Us" section at the end of this privacy notice.

This Policy and Notice is designed to give those to whom the notice applies an overview of our commitment to protection of your personal data, in particular relation to qualifications – our full Data Protection Policy and Privacy Notice are available at <https://gbwr.org.uk>, or by contacting the Compliance & Membership Officer.

Personal information we may collect

When you register for one of our courses with us, you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

Coaches and officials

If you have registered with us to receive more information about our coaching/teaching accreditation/qualification scheme and/or any of our education and teaching programmes you may also provide us with or we may obtain the following additional personal information from you:

- any coaching code or official number;



Qualification Policy

Data Protection Policy & Privacy Notice for Candidates

Great Britain Wheelchair Rugby



- your current affiliated club or other organisation (if applicable);
- coaching/teaching qualification and/or officiating history and any player rating (if any);
- accreditation/qualification start and end date;
- identification documents such as passport, utility bills, identity cards, etc.;

Disclosure of Your Personal Information

We share personal information with the following parties:

- Any party approved by you.
- To any governing bodies or regional bodies for the sports covered by us: to allow them to properly administer the sports on a local, regional and national level.
- Other service providers: for example, email marketing specialists, payment processors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- Our supply chain partners & sub-contractors, such as couriers, import/export agents, shippers,;
- Our Commercial Partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners as part of your membership package;
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

Your Rights in Relation to Personal Information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Qualification Policy

Data Protection Policy & Privacy Notice for Candidates

Great Britain Wheelchair Rugby



Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting Us" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

Allegations Reporting Procedure

Learners are required to report any allegation in relation to the unlawful treatment of personal data via the Great Britain Wheelchair Rugby learner complaint procedure.

Personnel are required to report any allegation in relation to the unlawful treatment of personal data via the Great Britain Wheelchair Rugby line management process.

A complaint should be made in the event that individuals feel that records of their personal data has been:

- lost or not protected
- obtained through unlawful disclosure or unauthorised access
- recorded inaccurately and/or in a misleading manner
- provided to a third party without permission
- held longer than required
- used for unlawful purposes

Where required, Great Britain Wheelchair Rugby will take appropriate action/corrective measures against unauthorised / unlawful treatment, loss, destruction or damage to personal data.

Changes to This Notice

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

Contacting Us

In the event of any query or complaint in connection with the information we hold about you, please email daniel.hook@gbwr.org.uk or write to us at GBWR, Rugby House, Twickenham Stadium, 200 Whitton Road, Twickenham, TW2 7BA.

The Head of the Centre can be contacted by emailing david.pond@gbwr.org.uk, or by writing to the address above.