

## Essex Chess Association (“ECA”) Data Protection Guidance for Officials

All ECA Officers and officials must familiarise themselves with the ECA’s Privacy Notice which can be found at: <http://essexchess.org.uk/index.php/cm-privacy>.

This guidance is designed to assist you in your work for the ECA to ensure that its data processors comply with the General Data Processing Regulations (GDPR) which came into force on 25<sup>th</sup> May 2018 and the Personal Electronic Communication Regulations (PECR) which interact with the GDPR and require express consent in some circumstances.

### Data Breaches

If you believe that any personal data that you hold in respect of ECA activities has been lost or sent to third parties (or otherwise exposed) outside of ECA official contacts, you should alert the General Secretary **immediately** (or in absentia the Assistant General Secretary). There is a legal obligation on the ECA to report a serious data breach to the Information Commissioners Office within 72 hours of discovery of the breach.

### Protecting an Individual’s Data

The main risk to the ECA is loss of an individual’s personal data or dissemination to third parties. The following guidance is intended to prevent this occurring:

- a) keep paper records locked away or in a locked private home;
- b) password protect computers, laptops and smart phones that can access ECA files which have personal data in them;
- c) password protect electronic files containing personal data before sending them electronically to other ECA Officers and officials who have a legitimate need for the information;
- d) use only password protected memory sticks or other storage devices;
- e) store safely in a locked private home any external storage drives and memory sticks;
- f) do not send any personal contact data files to any third parties not involved in legitimate ECA related chess activities;
- g) when sending emails to ECA Officers or officials use their assigned official email addresses only or the appropriate group email addresses;
- h) when sending email communications to a distribution list generally other than to ECA Officers and officials (e.g. squad lists or team lists) **use .bcc and not .cc**. That way the personal contact data within the list cannot be passed on inadvertently or deliberately by any recipient. The exception to this (subject to i) below) is where the recipients of the email would expect to need to communicate with other recipients to the communication (such as for arranging transport for a match). If in doubt, use .bcc;
- i) emails and other forms of electronic communications that relate to promotional material should contain a note that the recipient when replying to the communication can request to opt-out of similar future communications of a promotional nature;
- j) a Junior’s personal email address (as opposed to that of a parent or guardian) must never be sent in an open email to others, it must always be sent .bcc;
- k) for persons potentially new to a distribution list, who are being referred by a third party rather than making the approach directly themselves, their permission should be sought before their details are passed on or put in a database, explaining why the data is needed;

- l) all databases which would include membership lists and team squad lists must be kept up to date. Ensure that you periodically review these to ensure that only active members or players remain on them.
- m) should you cease to be an Officer or official of the ECA please ensure that following the handover of necessary data that you delete or otherwise dispose of any personal data you held in your role as an ECA Officer or official.

### **Erasing records**

In some circumstances the ECA may need to erase personal data relating to an individual upon receipt of the General Secretary (or in absentia the Assistant General Secretary) of a request to do so. This is not an absolute right. Should you receive a request from an individual to erase personal data you should refer this immediately to the General Secretary. There is a short time limit of 30 days for the ECA to comply if the request meets the relevant criteria. One example of where a request is likely to be legitimately refused is in respect of the results of games played and grading related information.

You will be notified by the General Secretary or other Executive member if it is necessary to erase an individual's personal data you may hold following such a request.

### **Contact details of Officers and Officials**

These will generally be protected using the published generic contact addresses for each role, which ECA Officers and officials should use in their electronic communications.

For Officers and officials not contactable by e-mail it is essential to have a contact telephone number which is known to other Officers and officials and an address for receipt of ECA paperwork.

It is the practice of the ECA only to display personal information relating to its Officers and officials with the consent of the individual concerned.

### **Collecting personal data**

- a) Explain in person if possible and follow up in writing why the data requested is necessary and what it will be used for. The ECA has adopted general Conditions of Entry which provide the written explanation for personal data collected in running its teams and events. An individual should be referred to this document when personal data is collected for these purposes.
- b) Always inform an individual that the ECA has a Privacy Notice and where it can be found. This is a reference document providing further information and sets out their rights.

### **Photography and other recording of images at ECA events**

This is restricted and is governed by both the ECA's Safeguarding Policy and Privacy Notice. There are special rules relating to Junior players. To facilitate implementation of these policies the ECA's Conditions of Entry for its teams and events specifically warn that

photography may take place and be published and that permission for photography is required.

Team and event organisers should be familiar with these policy documents and the procedure to be adopted. You decide whether to authorise for your event or match any unofficial photography.

It is essential that an objection to photography by an individual is respected without question and acted upon, particularly if it relates to a Junior player.

Ensure that:

- a) entry forms/circulars reference the ECA's Safeguarding Policy, Privacy Notice and any applicable conditions of entry;
- b) the taking of photographs etc is announced in advance and that these may be displayed on the website or published in the press;
- c) you explain why caution is necessary;
- d) you explain the purpose of photography and refer to the Privacy Notice;
- e) all photographers have registered with you in advance (name, address and contact details);
- f) all photographers are aware of the ECA's Safeguarding Policy (appendix 9), Privacy Notice and conditions of entry;
- g) photographs etc are not taken of Juniors without the prior consent of a parent or guardian and for Juniors aged 13 or over, the consent of the Junior;
- h) photographs etc of Juniors are not published without the prior consent of a parent or guardian and for Juniors aged 13 or over, the consent of the Junior;
- i) record any requests not to portray or identify an individual in any published material (notifying both the Webmaster/Publicity Officer and General Secretary);
- j) you inform the General Secretary (or in absentia the Assistant General Secretary of any request to remove an individual's photograph or other recorded image and act on that request;
- k) as an Officer or official of the ECA delete records of any unpublished images;
- l) the privacy of individuals is respected.

### **Legitimate Interest basis for the processing of data**

For most of the ECA's activities involving the processing of personnel data consent of individuals is not required.

The ECA's assessment following its implementation data audit is that it has a legitimate interest in the following processing of personal data in connection with:

- a) ECA membership
- b) ECF membership
- c) Essex League management
- d) running county teams and correspondence teams
- e) running other team events
- f) running events for individuals
- g) promoting Essex Championships
- h) promoting ECA chess and Essex teams

- i) other ECA promotions
- j) grading
- k) administration of the ECA
- l) safeguarding and archiving
- m) preserving and publishing historical records of game results and player's grades

This means there is no general need to seek explicit consent from individuals to process their personal data. The one possible exception to this is sending promotional direct marketing material to individuals who have not given their explicit consent to receive such communications from the ECA.

### **Other bases for processing of data**

The processing of membership information has a contractual basis and there are other bases that may relate to certain safeguarding information, where reference should be made to the ECA's Safeguarding Policy and Privacy Notice.

ECA Executive  
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