



HENLEY ROWING CLUB

Roles and Responsibilities for data collection and retention

Purpose of this document

This document describes the roles and responsibilities for data collection and retention for officials of Henley Rowing Club (HRC) or members of the club who are responsible for areas where potentially personal data are collected in order for them to perform a particular task.

Membership Secretary

The Membership Secretary is responsible for managing HRC's membership database held on ClubHub, British Rowing's membership management system. These details are not given to anyone from outside of HRC or used for non-club related purposes. Access to specific limited membership details may be temporarily shared internally within HRC when members who hold a 'position of trust' and request them for a specific purpose. All users are asked to use the data on a cloud-based system whenever possible and undertake to delete any soft- and hard-copies created when no longer required or at least at the end of each rowing season.

Members input their own details into ClubHub and are expected to keep their details up-to-date on the system.

The Membership Secretary will follow the procedures below:

- Membership data is retained for the current and last membership years only.
- All members are contacted annually to renew their membership. If the member advises that they do not wish to continue, that shall be taken as confirmation that they have left the club and after 6 months any records containing their details shall be destroyed securely, subject to any outstanding matters.
- If the Membership Secretary does not receive a reply from the member, their name shall be entered onto the list of inactive members. The member shall be contacted again after 6 months and their status reviewed. If there is no response, the Membership Secretary shall deem that to be confirmation that the member has decided to leave the club and their details shall be securely erased from the records, subject to any outstanding matters.
- All members who do not renew their membership will be asked in writing if they would like their contact information to be held by HRC so that they can keep in touch with the Club for newsletters, social events and such like.

Treasurer

All accounting records shall be maintained securely away from the club for 6 years and then securely destroyed.

Personnel records of past employees shall be maintained securely away from the club for 6 years from the termination of employment and then securely destroyed. The Club does not have any current employees.

To allow members to be reimbursed for membership or seat fee credit and approved expense claims for purchases made on behalf of the club, the Treasurer may keep the banking details of those members so that they may be reimbursed. Those details will be erased from the Treasurer's records as soon as that member ceases to purchase items regularly on behalf of the club or if the member leaves the Club.

Chairman

The Chairman, Captain and Secretary may receive formal complaints submitted by members and non-members. Some complaints may contain sensitive personal data or confidential data. Notes of formal meetings shall be recorded on password protected local and cloud-based computer systems and in paper records. Sensitive personal data held on children shall be retained until the child reaches the age of 25; data held on adults shall be retained for 10 years from the date of reporting. Documents relating to malicious allegations shall be destroyed on completion of the investigation.

Secretary

The Secretary is responsible for recording minutes of Committee meetings and filing them electronically. The Secretary will take care to make anonymous any information in the minutes which may contain personal data to avoid identification of individual members.

See also Chairman section above.

Captain and British Rowing Online Entry On-line Administrators

The Captain, coach or other designated member(s), shall be responsible for entering members into race events by the British Rowing Online Entry system. The only information that is required to enter is the name of the member and the age category that they are entering, as all other details identifying that individual are held by British Rowing on their system.

Safety Officer

The Safety Officer, coach or rowing member may report incidents that occur on the water to British Rowing via the British Rowing Incident Reporting system. Those reports should be treated as confidential data and the names of juniors withheld. Where those reports are used by British Rowing

to provide the basis for general safety advice to their members, the information shall be anonymised by them.

Club Welfare Team

Welfare shall be responsible for maintaining records of medical personal data for all junior participants and shall share relevant data with the Coaching Team. Personal data for junior members is stored in ClubHub and on a cloud-based system and updated at least annually. Personal data shall be erased securely at the end of the junior's J18 season or within a year of confirmation that they have left the club permanently.

Welfare may receive confidential or sensitive personal data about an individual member relating to safeguarding concerns and shall use standard paper record templates advised by British Rowing to capture relevant data. Notes of formal meetings, emails etc shall be recorded on password protected local and cloud-based computer systems and in paper records. Paper records shall be stored securely away from the club in unmarked files. Sensitive personal data held on children shall be retained until the child reaches the age of 25; data held on adults shall be retained for 10 years from the date of reporting. Documents relating to malicious allegations shall be destroyed on completion of the investigation.

Personal data captured for the purpose of DBS clearance procedures shall only be retained until the online application is successfully completed. All information in paper form shall be destroyed securely.

Welfare shall only pass on junior member's personal data to other club members in a 'position of trust' on a need to know basis, or to British Rowing as necessary to protect the interests of the individual, and where appropriate with the individual's or parent/carer's consent. Welfare shall only pass on details to other statutory bodies if advised by British Rowing and with parent/carer's consent, unless it is inappropriate to do so, or if there is an emergency and the individual is at risk.

Coaches

Coaches are responsible for organising training sessions and sharing information with the rowing members in their groups. They maintain electronic records of personal data on password protected local and cloud-based computer systems and in paper records. Personal data shall be securely erased within one year of confirmation that the member has left the club. At the end of each season the coach will update the squad contact list and social media group(s) to reflect current membership, securely deleting those members who have left. Personal data received from the Club Welfare Team will be deleted at the end of each season.

Performance data and other data collated for the purpose of creating/monitoring training programmes and rowing performance shall be stored securely - paper versions in locked units or as password protected electronic data. Data collected about members who have left the Club may be retained for legitimate interest purposes and in such cases, that data will be anonymised.

Coaches receive records of medical personal data for all junior participants from Welfare via a cloud-based system. Personal data shall be erased securely at the end of the junior's J18 season or within a year of confirmation that they have left the club permanently.

Learn to Row/Summer Camp Bookings

The co-ordinator of the Learn to Row and Summer Camp bookings will maintain an electronic record of personal data on password protected local and cloud-based computer systems. The co-ordinator will only pass on details of data to other club members in a 'position of trust' on a need to know basis and for a specific purpose, for example to coach the sessions. Within 12 months of completion of the session the information will be deleted/destroyed.

Other booking information: Visiting Crews, HRR campers, Corporate Days, Parties, etc

The club receives requests for bookings for use of equipment and facilities. The club only requests relevant information in order to provide the service. The relevant information is stored on a password protected cloud-based computer system. Information on the visit will be destroyed within 12 months of the booking date.

Henley Open Events

The club organises two annual events which are British Rowing affiliated competitions and use the BROE2 entry process to provide information and manage the consent process for every competitor. Paper copies of personal data used for the event are destroyed immediately after the event.