

Data Protection & Retention Policy

Including the General Data Protection Regulation (GDPR)

Welsh Athletics places great importance on looking after company and personal data. This policy sets out how we actively manage the data collected, stored, and used about you and others. Please discuss with your manager any observations or concerns about data handling at any time and help keep your data up-to date by telling the finance team when your personal data changes.

Scope: This policy applies to:

- All employees, contractors, and third-party service providers.
- All forms of data (electronic, paper, audio, video) processed by Welsh Athletics and its data processing and co-processing partners

Responsibilities

- The Data Protection Officer (Andrew Thomas) advises and oversees compliance.
- Department Heads: Ensure adherence within their teams.
- Employees: Follow retention and disposal guidelines.

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Introduction

Welsh Athletics needs to hold and use information about its employees, job applicants, athletes, members and suppliers, to carry out its business.

Where the information stored constitutes personal data that relates to a living individual, we are obliged to comply with the requirements of the Data Protection Act, 2018, and General Data Protection Regulation (GDPR) 2018, as amended.

This Policy sets out what data will be retained and how this data will be managed. This policy should be read in conjunction with our **Privacy Notices** covering different groups of people.

Data Protection Principles

Welsh Athletics is required to ensure that personal data is:

- processed fairly and lawfully.
- processed only for specific purposes.
- adequate, relevant and not excessive.
- accurate and kept up to date.
- kept for no longer than is necessary.
- kept in accordance with your rights; and
- kept securely and not transferred outside the European Economic Area unless an adequate level of protection for your rights is in place.

In essence, this means that we aim to tell you, in writing, what information we hold about you, the legal reason we hold it, as below, from whom we have obtained it, to whom we will disclose it, where the data is being transferred to (if outside the UK), how the data is to be protected, and the retention period of the data.

Personal Data, and the legal reasons why we hold it

The following are the legal options for holding data about living individuals:

- We are given specific consent
- Processing is necessary for the implementation and performance of a contract with the individual
- Compliance with a legal obligation
- Processing is necessary to protect the vital interests of the individual or another person
- The data is necessary for the performance of a task carried out in the public interest
- Welsh Athletics has a legitimate interest in holding the data, which could be stored and or processed by a third party (someone acting on Welsh Athletics' behalf).

Employment

Much of the personal or sensitive personal data stored by will relate to employment.

In terms of employment, these are the reasons why we keep and process data:

- considering your suitability for employment;
- administration of the payroll and provision of employee benefits and equipment;
- compliance with legal requirements;
- performance and absence monitoring;
- in connection with disciplinary matters;
- to establish your training and/or development requirements;
- to establish a contact point in an emergency.

Most of the above data will be provided by you at recruitment or thereafter, with some provided by your manager, HR or Payroll.

Sensitive Personal Data

In addition, Welsh Athletics may hold, use and otherwise process sensitive personal data.

Sensitive personal data is, according to the GDPR, personal data which consists of the following:

- racial or ethnic origin;
- political opinions;
- religious or similar beliefs;
- membership or otherwise of a trade union;
- physical or mental health or condition;
- sexual life;
- your commission or alleged commission of any offence; or
- proceedings relating to such an offence.

We envisage processing sensitive personal data in the following circumstances:

- relating to your physical or mental health or condition, for health monitoring purposes, assessing your suitability for work and for equal opportunities monitoring;
- information relating to your racial or ethnic origin where relevant to any application for a work permit and for equal opportunities' monitoring;
- information relating to your membership or otherwise of a trade union for the purpose of undertaking consultations with employees where we are required by law;
- information relating to your commission or alleged commission of any offence and proceedings relating to such an offence where appropriate for determining your suitability for employment initially and on an ongoing basis.

A high level of security will be in place for this type of data and limited access will apply.

Obligations relating to your Personal Data

Personal data and sensitive personal data will be held, both manually and on computer.

This data will only be kept for as long as necessary and in accordance with legislation and Welsh Athletics' data retention policy.

To enable us to comply with the obligation to keep data up to date, you are required to immediately notify Welsh Athletics of any changes to your personal details including, without limitation, any changes to your name, address, emergency contacts (employees only) and bank details.

Obligations relating to the Personal Data of Others

Welsh Athletics will not make use of, divulge, or communicate to any person, any personal data or sensitive personal data relating to any third parties, including without limitation the following:

- applicants for employment (successful and unsuccessful);
- employees and former employees
- other individuals who are doing work or have done work for Welsh Athletics

Breach of this requirement will be treated very seriously and, where appropriate, disciplinary action will be taken against the relevant employees. You should also be aware that, in certain circumstances, someone making an unauthorised disclosure of personal data, could be committing a criminal offence.

Welsh Athletics will carry out a **Data Protection Impact Assessment** when implementing new technology or dealing with processing involving high risk for individuals.

Data Subject Rights

The GDPR gives employees certain rights in connection with personal and sensitive personal data which relates to them.

These are your rights in relation to your personal data:

- to be informed of what data we hold, why we hold it and where it came from. This will be explained at the point of requesting the information.
- to make a **subject access request** and (subject to certain legal exemptions) to receive copies of your personal data which we hold. If you wish to exercise this right, you must make a request in writing to a senior member of staff. There will normally be no charge for providing the information you have requested, and it will normally be provided within one month from the date of request.
- to have any inaccurate data corrected or erased.
- to restrict processing.
- data portability.
- to object to the data being held and processed. This may, however, not result in us withdrawing our holding and processing of the data.
- to withdraw consent under certain circumstances.
- other rights in relation to automated decision making and profiling.
- to lodge a complaint with a supervisory authority.

Where Welsh Athletics decides to use an external data processor, this will be detailed in the written contract. This will ensure that both sides understand their responsibilities.

Data relating to children may require the parents' consent.

Welsh Athletics is obliged to report data breaches within 72 hours. Disciplinary action will be taken against you should you not report a breach immediately you are aware one has occurred.

Data Retention

This section describes how Welsh Athletics manages, stores, and disposes of data throughout its lifecycle to ensure compliance with UK GDPR and Data Protection Act 2018.

Principles:

- Data will only be retained for as long as necessary for its intended purpose
- Data will be stored securely and disposed of safely or anonymised for statistical use
- Retention periods will be documented and communicated where required

Retention Schedule

Generally, where there is no legal requirement to do otherwise, we retain all physical and electronic records for a period of 4 years after last contact or expiry of benefit or licence.

Exceptions to this rule are:

Data Type	Retention Period	Disposal Method
Employee Records unsuccessful job applicants Financial & Payroll Records	6 years, after termination 3 months default, maximum 2 years 6 years, or per HMRC rules	Secure deletion / anonymisation Secure deletion / anonymisation Secure deletion / anonymisation
Customer & Supplier data	6 years	Secure deletion / anonymisation
Queries, complaints and general correspondence	6 years	Secure deletion / anonymisation
Marketing Contacts	3 years, after last in contact with	Secure deletion / anonymisation
Licensed Volunteers data (Coach & Official)	Length of service and for fifty years thereafter	Secure deletion / anonymisation
Member Athlete data (representing country)	time athlete represented their country and fifty years thereafter	Secure deletion / anonymisation
Volunteers (unlicensed)	6 years, after last volunteering	
Event Results data	6 years, after event - or longer if required to maintain a comprehensive and published index of results.	Secure deletion / anonymisation
Information relevant to personal injury, employment claims or discrimination claims	For the period for those types of claims (per insurance policy)	Secure deletion / anonymisation
Safeguarding data	Adults (normal retirement age or 10 years, if retired) Child (until child is 25)	Secure deletion / anonymisation
CRB / DBS certificates	If the results are disputed, the certificate may be retained for a maximum of 6 months	Secure deletion / anonymisation Retain: date, level and type of check, plus certificate number
Medical data (athlete)	eight years after the conclusion of treatment. For children and young people, until their 25th birthday.	Secure deletion / anonymisation

Where there is a legitimate reason to retain data beyond the schedule retention periods, this must first be discussed with the Data Protection Officer and any files marked with the reasoning for an extended retention period and the revised retention date.

Review & Audit

This policy will be reviewed regularly and at a minimum of every three year or immediately if the law or business needs change.

Breach & Non-Compliance

Any breach of this policy must be reported to the DPO immediately.
Non-compliance may result in disciplinary action.

Related Policies

- Data Protection Policy
- Information Security Policy
- Privacy Notices