

Academy of Historical Arts



Data Protection Policy

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Version and Copyright Information

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Abbreviations:

The Academy of Historical Arts may be abbreviated to "Academy" or "AHA" throughout this document.

The Academy of Historical Arts asserts its right
to change this policy at any time.

1 What data will be stored by the Academy

The Academy of Historical Arts will store the following personal information about subscribers:

- full legal name;
- date of birth;
- contact phone numbers;
- email address;
- any allergies suffered;
- any medical conditions suffered;
- any relevant qualifications (such as first aid certificates);
- any Academy qualifications (such as an instructor qualification);
- the primary club at which the individual trains (if applicable);
- any warnings issued by the Academy or by an AHA club.

When attending Academy events, participants may have to register for the event, and this process may require the provision of some personal details. Normally these will be the same details as are described above, but further details may be requested depending on the nature of the event. All data taken from event registration forms will be pertinent to the event and the processing of this data will be done solely to allow the administrators of the Academy to organise the event and its activities.

At any time, the AHA Data Controller may make a random spot check on any data stored by the Academy to ensure that it is reasonable. The AHA Data Controller should also inspect any registration forms to ensure that data is not being collected without good purpose.

2 Access rights to stored data

An individual may request access to any information stored by the Academy about himself or herself, in order to verify that the stored information is correct and up to date. No individual will be granted access to another individual's data.

Ranking members of the Academy may be granted access to the personal information of any subscriber in order for the ranking member to perform his or her job correctly. For example: instructors may need to know if any of his or her students have attention deficit disorders, and first aiders will need to be informed about event participants with allergies.

3 Requesting access to personal data

If an individual would like to access personal information stored by the Academy about himself or herself then the *AHA Request for Data Access* letter should be completed and sent to the AHA Data Controller. Once the letter has been received and the individual has been positively identified, the individual will receive a response from the AHA Data Controller and may make arrangements with the AHA Data Controller as to when and where to meet so that the information may be safely and securely disclosed to the individual.

This process may sound very bureaucratic and unnecessarily complicated, but this method allows the Academy to comply fully with the Data Protection Act 1998 for the United Kingdom, whereas providing access to personal information in an informal and undocumented fashion would tread the fine line between legal and illegal processing of stored data. Furthermore, by enforcing this method, there is an archived record of data access requests that have been granted and refused, and this keeps the AHA Data Controller accountable to both the Academy subscribers and the Data Protection Commissioner for the United Kingdom.

Instructors and staff members engaged by the Academy may have the requirement of sending a *AHA Request for Data Access* waived, due to the large number of such requests that may have to be made over the course of the year. However, to retain accountability and transparency of such data accesses by staff and instructors, the AHA Data Controller must make random spot checks upon data accessing practices. If a staff member or an instructor is found to be acting irresponsibly with stored data then disciplinary action will ensue and the individual's access to any and all stored data (except for their own) will be revoked.

4 The First Data Protection Principle: Fair and Lawful Processing

At the time when the Academy collects the personal information about an individual, a ranking member of the Academy will explain precisely why the data is being collected. No data will ever be collected for secret reasons. All data about an individual will be collected from the individual in question; at no time will second-hand information be collected about an individual.

The name and contact details of the AHA Data Controller will be made available through the Academy's website.

5 The Second Data Protection Principle: Processing for a Specified and Lawful Purpose

The purposes for which the personal data is collected are as follows:

- to provide the leaders and administrators in the Academy with a contact list for their group(s);
- to provide the leaders and administrators in the Academy with the necessary contact details so that they can contact any single subscriber as required;
- to provide the leaders in the Academy with all of the necessary information about allergies suffered by subscribers, so that measures can be taken to reduce the risk of subscribers suffering an allergic reaction at any Academy event;
- to provide the leaders in the Academy with the necessary information to give to a hospital if an individual suffers a serious accident during a Academy event;
- to provide the leaders in the Academy with the necessary information to determine whether or not it is safe to allow an individual to participate in an activity. This may be for the safety of that individual, the safety of other group members or the safety of people in general. There are unfortunately some situations where it might be unethical, immoral and potentially illegal for the Academy to allow an individual to participate in certain activities, and so the Academy's leaders must have access to information that will let them make this decision.

Data will never be processed for any other reason.

6 The Third Data Protection Principle: Data not to be Excessive

The only data that will be collected about subscribers to the Academy is data for the specific purposes mentioned in the previous section. Stored information will be used to provide better teaching for subscribers, to provide a contact list for group leaders to allow the leaders to manage and organise their club(s), to provide appropriate medical information for the individual's own benefit in situations such as participation at Academy events.

Administrators may add information about an individual if this information is reasonable. For example, if during the course of the year an individual passes a first aid qualification, then an administrator may add this note to the individual's record.

No personal information will ever be asked for and stored other than the information on the *AHA Subscription Form* or an event registration form. The AHA Data Controller may make spot checks on stored information (and proposed registration forms) to ensure that the data collected will not be excessive.

7 The Fourth Data Protection Principle: Accuracy of Data

Every Academy subscriber will submit one *AHA Subscription Form* at the start of each subscription year (1st September through until 31st August, inclusive), or at the commencement of their subscription if subscription is purchased after the year has begun. Furthermore at any time during the year an individual may request (and be granted free of charge) access to the information stored about him or her self, and may correct any errors or bring the information up to date if anything has changed since the *AHA Subscription Form* was submitted.

Data will never be collected from a third party about an individual, so all information stored about an individual will have come directly from that person or will have been added as appropriate by an administrator (for example, noting that an individual has passed a first aid qualification).

8 The Fifth Data Protection Principle: Data not to be Kept Longer than Necessary

Data about an individual will be stored in an active database while the individual maintains subscription to the Academy. If the individual does not renew his or her subscription for the following year, the stored data will be archived for one more year, at which point the archived personal data for that individual will be securely destroyed.

The AHA Data Controller may make spot checks on databases to ensure that data has been removed in accordance with this policy.

9 The Sixth Data Protection Principle: Data Subject Rights

As mentioned above, each Academy subscriber has the right to access his or her own data, to ensure that it is correct and to update the information if it is no longer correct. This will always be free of charge; a fee will never be levied on an individual for access to his or her personal data.

Personal information about an individual will never be shown to any other person or organisation. The only person who will always be granted access to an individual's data will be that individual; the only other people who may be granted access to an individual's data will be the ranking members of the Academy who may need access to the information for organisational or management purposes.

10 The Seventh Data Protection Principle: Security

All personal and sensitive data will be stored in electronic data formats. The resultant data files will be kept on local hard drives (with backup drives for safety) and may be shared into "the cloud" to enhance co-operative administrative efforts. Files and data will never be shared with anyone who does not have a reason or purpose for accessing the files or data.

If files are being transferred on external drives that may also be used for other purposes at other times, the files should be removed from the external drives immediately once the transfers are complete. Electronic data should not persist without thought for who might see it at a later date.

Paper copies of personal data may sometimes be kept to help with the processing of the data. Once the processing has been done and the paper copies are no longer required, the paper copies should be destroyed securely. Paper copies of data are to be kept in a secure location, to which only authorised members of staff and Academy administrators may have access.

11 The Eighth Data Protection Principle: Transfer Outside the European Economic Area

At no time will personal data stored by the Academy be transmitted to any individual or organisation outside the European Economic Area.

The only exception to this rule will be if the organisation expands and opens a branch in a country outside the European Economic Area, in which case the organisation will work with the new branch to ensure that its computer and data storage systems are secure before any data transfer takes place.

All groups affiliated to the Academy will abide by a data protection policy similar to this document.