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## 1.0 INTRODUCTION

Netball Ireland (NI) is the national governing body which is responsible for all aspects of netball in the Republic of Ireland (ROI) including organising competition, training events, operating national squads, and promoting and developing the sport in general. NI has been affiliated to World Netball and Europe Netball (EN) since 1976.

The NI association and its subsidiaries are, for the purposes of data protection legislation, the data controllers. NI is the owner of [www.netballireland.com](http://www.netballireland.com) and is committed to protecting privacy and processing of personal data in accordance with relevant data protection legislation – namely, the ROI Data Protection Acts 1998-2018 and the General Data Protection Regulation (GDPR) (EU) 2016/679.

## 2.0 PURPOSE

The purpose of this GDPR Policy is to outline how NI process, use, and securely store the information obtained from members and non-members involved in NI activities.

## 3.0 APPLICABLE

This policy applies to all NI members, including:

- All players.
- Umpires and other officials.
- Coaches and assistant coaches.
- NI partners:
  - Persons appointed or elected to boards, committees and sub-committees
  - Support personnel, including managers, physiotherapists, psychologists, sport trainers, masseurs and others.
- Volunteers.
- Executive Committee members and designated working groups.
- Honorary Members.

It is the individual responsibility of every person to whom this policy is applicable to ensure they are compliant with the procedures and stipulations contained therein.

Document prepared by Emma Wall, Vice President, and completed by Alesha Clark, Honorary Secretary	Date: 11/05/2021
Approved by: _____ Lynette Wall, President	Date: 03/06/2021

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#### **4.0 SCOPE**

This policy relates only to information that NI acquire from members and non-members involved in NI activities. If anyone visits a website operated by a third party via a link included on NI's website/social media platforms his or her information might be used differently by the operator of the linked website.

This policy outlines how NI upholds the following data protection principles:

1. Obtain and process information fairly.
2. Keep information only for specified, explicit and lawful purpose/s.
3. Use and disclose information only in ways compatible with these purposes.
4. Keep information safe and secure.
5. Keep accurate, complete and up-to-date information.
6. Ensure that information is adequate, relevant and not excessive.
7. Retain information only as long as is necessary for the purpose it was provided.
8. On request, give a copy of his or her personal data held by NI to the individual.

#### **5.0 DATA PROCESSING**

##### **5.1 Information NI collects**

NI may collect information about anyone (members and non-members) through the NI membership registration process and website/social media, including: Persons name, date of birth (DOB), gender, email address, postal address, telephone number, and any other personal/sensitive information voluntarily provided via NI's online and hardcopy forms.

NI also collects information pertaining to complaints, allegations, and disclosures made through the NI complaints process (see NI-1015 Complaint, Dispute and Disciplinary policy) and child protection and safeguarding policies.

##### **5.2 Information provided to NI**

NI may be provided with information about participants and attendees at NI events. That information may include: a person's name, DOB, gender, email address, address, telephone number, and any coaching qualifications or officiating licenses held.

As per 5.1, NI is provided with information pertaining to complaints, allegations, and disclosures made through the NI complaints process (see Complaint, Dispute and Disciplinary policy) and child protection and safeguarding policies.

##### **5.3 Netball Data**

The information NI collects about members and non-members and the information provided to NI about participants and attendees at NI events (as per 5.1 and 5.2) is defined as 'Netball Data'.

NI may use Netball Data for several purposes, including for example:

- To process and manage membership/affiliation.

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- To deal with requests, enquiries, and complaints/allegations/disclosures.
- For notifications about netball events.
- To process and fulfil a person's voluntary role.
- To perform appropriate Garda Vetting.

#### **5.4 Protecting Netball Data**

NI use up-to-date industry procedures to protect personal information. Netball Data will be securely stored in NI's shared drive to which only authorised members have access to information relevant to the administration of their role. NI will not transfer Netball Data outside of the European Economic Area unless for competition requirements and with implied consent. By submitting personal data, the person agrees to this transfer, storing or processing. NI will take all reasonable steps to ensure that Netball Data is treated securely and in accordance with this privacy policy. The internet is not a completely secure medium and therefore NI cannot guarantee the unreserved security of any information provided to the association.

For further details on NI data security, please contact [info@netballireland.com](mailto:info@netballireland.com).

#### **5.5 Legal basis for processing information**

NI will process (share) Netball Data based on the following legitimate interests:

- To provide selected external providers with a facility to check and validate data as to support NI administrative processes. For example: transfer of name and DOB to check membership validation at point of entry to international netball events.
- To transfer registered members from one affiliated club to another. The persons record will be maintained with only the club name associated with the record changed.
- Providing relevant and necessary information via email, text, and post regarding the following:
  - Changes to rules and regulation.
  - Updates to advice and guidance relating to specific roles held within NI.
  - Transactional information relating to competition and events, coach and officiating licenses, courses, development events and qualifications.
  - NI Annual and General meetings.

NI reserve the right to share any affiliated member's Netball Data with third party data managers who support NI in administration of netball. NI will share only what is needed for those purposes and, where possible, will anonymise the data before sharing. To share information for any other purpose, prior consent will be requested by NI.

When collecting Netball Data, NI will notify about any intent to send information about NI products and services. NI will give members the opportunity to opt in to any such communications and will advise regarding an opt-out at any time.

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Any Netball Data shared with third parties for marketing purposes will only be done with prior consent from the relevant party. Anyone can opt out at any time by notifying NI via [info@netballireland.com](mailto:info@netballireland.com) for follow up by the Data Protection Officer.

NI reserve the right to share personal information provided to NI with An Garda Síochána and other Statutory Agencies for the purposes of crime prevention, crime detection or the safety of our members. This is done on a strictly case by case basis and through a tightly controlled process to ensure compliance with data protection legislation.

### **5.5.1 Child Safeguarding**

- Child Safeguarding records and information received for the purpose of Garda Vetting is held securely on the NI shared drive, with restricted access to the Child Protection Officer and President of NI.
- Access to individual club's Child Safeguarding records is only available to the Club Children's Officer/Designated Liaison Person/Mandated Person of the affiliated club.
- Child Safeguarding records should only be used for the purpose for which they are intended and will be shared only on a need-to-know basis in the best interests of the child/ren.
- All agencies dealing with children must cooperate in the sharing of records with Tusla where a child protection or welfare issue arises. An example of this could be information needed for a Child Protection Conference or Strategy Meeting or information important for the assessment of risk to a child.

### **5.5.2 Garda Vetting**

- Information received for the purpose of Garda Vetting is held securely on the NI shared drive with restricted access to the Child Protection Officer and President of NI.
- Garda Vetting applicants should be aware that NI are obliged to keep the Inviter form (NVB1) plus the documentation gathered to verify ID on file for a minimum of 3 years as this information can be subject to compliance checks by the National Vetting Bureau (NVB). Each application (and associated ID documentation) is logged on the NI shared drive and the additional information recorded:
  - The date the application was sent onto the NVB by NI.
  - The date NI received the vetting disclosure result from the NVB.
  - The result of the disclosure.
- NI will only send the results of a Garda Vetting Disclosure to the applicant and, if required, the NI Garda Vetting Committee.

## **5.6 Data Retention**

**5.6.1** Any data collected by NI will be deleted in accordance with timescales set out below:

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<b>Type of Data</b>	<b>When Deleted</b>
Name, DOB, gender, email address, address, telephone number, names of NI affiliated clubs that you are a member of, and details regarding any coaching or officiating licenses held	Three years after an individual has last renewed their membership with the association.
Data on any injuries, medical conditions etc	On the receipt of a new annual membership form or six years as per insurance requirements
Affiliation forms	Three years after an individual has not played an active part in NI activities
Vetting data, application forms and associated documentation (including photo ID and proof of address)	Four years after the receipt of a vetting application on its expiry
League competition results (including club names)	Indefinite as a record of NI sporting results
National and League Competition Officials - Name, date of birth, gender, email address, address, telephone number	Annually, on the 1 <sup>st</sup> September all data older than 12 months will be deleted
Training camp applications (including Summer camp)	Annually, on the 1 <sup>st</sup> September all data older than 12 months will be deleted
Content of text or messaging systems	Annually, on 1 <sup>st</sup> September all outdated data older 12 than months will be deleted
National team sheets and training attendance lists	Annually, on 1 <sup>st</sup> September all data older 12 than months will be deleted
Names of national squad members selected as part of team for international event (including international appearance records)	Indefinite as a record of international sporting results
Records pertaining to NI's complaint, dispute, disciplinary, and appeals processes	On 1st September all data older 36 months will be deleted, except when retention is required by external agencies or due to legal requirements (timescale for which will be dictated to NI on a case-by-case basis)

**5.6.2** NI committee members should ensure they and their designates apply the following to all Netball Data under their remit – see NI's GDPR Compliance (SOP) (NI-1008) for further reference.

<b>Role</b>	<b>Data</b>	<b>When deleted</b>
All Roles	Name and personal contact details of committee members Text or messaging systems	On 1st September all data older 12 months will be deleted
	Records pertaining to NI's complaint, dispute, disciplinary, and appeals processes	On 1st September all data older 36 months will be deleted, except when retention is required by external agencies or due to legal

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		requirements (timescale for which will be dictated to NI on a case-by-case basis)
Secretary	Website query submissions	On 1st September all data older 12 months will be deleted.
	NI affiliation/membership data	Membership numbers will be recorded indefinitely but all personal affiliation information deleted on 1 <sup>st</sup> September.
Social Media and Communications	Information for social media content Social media query submissions	On 1st September all data older 12 months will be deleted
Coaching Convenor	Coaching qualifications and personal information	Three years after an individual has last renewed their membership with the association.
	Text or messaging systems	On 1st September all data older 12 months will be deleted
	Coaching queries	On 1st September all data older 12 months will be deleted
Umpiring Convenor	Umpiring qualifications and personal information Table official qualifications and personal information	Three years after an individual has last renewed their membership with the association.
	Text or messaging systems	On 1st September all data older 12 months will be deleted
	Umpiring queries	On 1st September all data older 12 months will be deleted
International Squads Manager	Squads Coaches/Team Management personal information, including recruitment documentation	On 1st September all outdated data older than 12 months will be deleted
	National Competition: Table Officials Log	Indefinite as a record of sporting results and contributions
	Social media and website query submissions	On 1st September all outdated data older than 12 months will be deleted
	Squad Finances and associated documentation	On 1st September all data older 36 months will be deleted

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	Player Information:	
	Personal information	Three years after an individual has last renewed their membership with the association.
	Medical or injury information supplied to you by player	On the receipt of a new annual membership form or Six years as per insurance requirements
	Affiliation Forms	Three years after an individual has not played an active part in NI activities
	Text or messaging systems	On 1st September all data older 12 months will be deleted
	Team sheets and training attendance lists	On 1st September all data older 12 months will be deleted
	Competition results	Indefinite as a record of sporting results
	International Player Record	Indefinite as a record of sporting results and contributions
League Administrator	Social media and website query submissions	On 1st September all data older 12 months will be deleted
	Player registration/Affiliation Forms	Three years after an individual has not played an active part in NI activities
	Player personal Information	Three years after an individual has not played an active part in NI activities
	Text or messaging systems	On 1st September all data older 12 months will be deleted
	Competition results	Indefinite as a record of club sporting results
	League Competition: Table Officials Log	Indefinite as a record of sporting results and contributions
Youth Development Officer	Personal Information for school contacts (players, coaches, and teachers)	Three years after an individual has last renewed their membership with the association.
	Social media and website query submissions (from parents/guardians,	On 1st September all data older 12 months will be

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	schools, tour operators, etc)	deleted
Web Coordinator	Website query submissions	On 1st September all data older 12 months will be deleted
Child Protection Officer	Vetting data, application forms and associated documentation (including photo ID and proof of address)	Four years after the receipt of a vetting application on its expiry
	Child safeguarding incident reports	Six years, as per insurance requirements, except when retention is required by statutory agencies or due to legal requirements (timescale for which will be dictated to NI on a case-by-case basis)

### 5.7 Changes to GDPR Policy

NI regularly review the GDPR Policy and updates will be shared when necessary.

## 6.0 YOUR RIGHTS

GDPR legislation gives individuals a number of rights in relation to any personal data an organisation holds about them, and it is NI's policy to make it as easy as possible for people to exercise these rights.

### 6.1 Subject Access

Individuals are entitled to be told what personal data an organisation holds about them. You can make a 'Subject Access Request' to NI via email ([info@netballireland.com](mailto:info@netballireland.com)) for confirmation of your Netball Data that NI holds.

All Subject Access Requests are subject to a €20.00 fee. Two forms of identification are required from applicants (e.g. driver's license, utility bill) and, if appropriate, any particulars about the source or location of the information requested. NI has 30 days to respond to any Subject Access Request.

### 6.2 Rectification and Erasure

If you believe that NI is holding inaccurate personal information about you, you're entitled to ask NI to rectify that Netball Data. In addition, if you believe that NI no longer has a lawful basis to use your Netball Data, you can ask NI to delete it.

The right to rectification and erasure is not absolute, but NI will consider any request carefully and comply with such request where appropriate. You can ask to have your Netball Data rectified or erased by contacting the NI Data Protection Officer via [info@netballireland.com](mailto:info@netballireland.com).

### 6.3 Withdrawing Consent

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If NI's lawful basis for collecting and using Netball Data was consent, then you are entitled to withdraw consent at any time. You do not need to justify the withdrawal of your consent but must be aware that this may prevent NI administering your membership and thus prevent participation in netball activities under the auspices of NI.

You can inform NI of your wish to withdraw consent by contacting the NI Data Protection Officer via [info@netballireland.com](mailto:info@netballireland.com).

## 7.0 DOCUMENT HISTORY

Version 01: This is a new Policy

Version 02: Updated governing body name to 'Europe Netball'

## 8.0 ABBREVIATIONS & DEFINITIONS

NI	Netball Ireland
ROI	Republic of Ireland
EN	Europe Netball
GDPR	General Data Protection Regulation
DOB	Date of birth
NVB	National Vetting Bureau

Netball Data: the information NI collects about members and non-members, and the information provided to NI about participants and attendees at NI events.

Young people/person: any person under 18 years of age.

## 9.0 REFERENCE

NI-1008 GDPR Compliance (SOP)

NI-1015 Complaint, Dispute and Disciplinary Policy

ROI Data Protection Acts 1998-2018

GDPR (EU) 2016/679

An Garda Síochána: the national police service of the ROI, headed by the Garda Commissioner who is appointed by the Irish Government.

Tusla: the dedicated ROI agency responsible for improving wellbeing and outcomes for children.