



DATA PROTECTION POLICY

SQUASH WALES STAFF

1. Introduction

As your employer, Squash Wales needs to hold and use information about you for the purposes of your employment. Much of this information is “personal data” and “sensitive personal data”, as these terms are defined in the Data Protection Act 1998 (the “DPA”). Accordingly, we are obliged to comply with the requirements of the DPA. This policy is to provide you with information regarding those requirements and your responsibilities and rights under the DPA.

Squash Wales also holds, uses and otherwise processes a great deal of information about other individuals, much of which is sensitive and confidential. In addition to your general obligations to Squash Wales regarding confidential information, you should bear in mind that, where this information constitutes personal data that relates to a living individual, we are obliged to comply with the requirements of the DPA.

2. Data Protection Principles

Under the DPA, Squash Wales is required to ensure that your 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.

In essence, this means that we aim to tell you what information we hold about you, why and for what purpose we hold it, from whom we have obtained it and to whom we will disclose it. We also aim to ensure that all your personal data is up to date and held securely.

3. Personal Data

Personal data is information which relates to an individual who can be identified from that information, whether or not in conjunction with any other information.

As your employer, Squash Wales will hold, use and otherwise process personal data relating to you for any purposes which reasonably arise out of and/or in connection with your employment, including without limitation, for the following purposes:

- considering your suitability for employment;
- administration of the payroll;
- provision of employee benefits;



- compliance with legal requirements;
- performance monitoring;
- absence management;
- effective management of the work we carry out;
- publicity;
- in connection with disciplinary matters;
- to establish your training and/or development requirements;
- to establish a contact point in an emergency.

4. Sensitive Personal Data

In addition, Squash Wales may hold, use and otherwise process sensitive personal data which relate to you for any purposes which reasonably arise out of and/or in connection with your employment with Squash Wales.

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

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

Processing of personal data occurs when Squash Wales holds personal data and/or carries out any operation relating to that information, such as altering or deleting it, accessing, downloading, reviewing or transferring it.

We envisage processing sensitive personal data in the following circumstances:-

- information 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 to 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.

5. Obligations

5.1 Obligations relating to your Personal Data

In signing and agreeing to your terms and conditions of employment with Squash Wales, you have explicitly consented to Squash Wales holding, using and otherwise processing personal data and sensitive personal data relating to you for all purposes reasonably arising out of your employment with Squash Wales including the purposes specified above.

Personal data and sensitive personal data relating to you will be held by Squash Wales both manually and on computer. Such data shall only be kept for as long as we deem necessary, in accordance with the attached guidelines. Other members of staff will have access to your personal data as may be required to fulfil the purposes specified above.

We are required to ensure that all personal data and sensitive personal data which we hold is accurate and, where necessary, kept up to date. In order to enable us to comply with this obligation, you are required to immediately notify Squash Wales of any changes to your personal details including, without limitation, any changes to your name, address, emergency contacts and bank details.

5.2 Obligations relating to the Personal Data of Others

Consent may need to be obtained from the individual whose personal data is being processed by you; for advice in specific circumstances please check with mike.workman@squash.wales. When processing sensitive personal data it is essential that the individual who the sensitive personal data is about has given explicit consent to the processing. You cannot assume that consent has been given and you must check that there is written consent which applies to the particular case. Where there is no written consent, it should be requested from the appropriate individual.

In the course of your duties, you may be required to process personal data which relates to other individuals. You are required to comply with the data protection principles set out above and with any specific instructions given to you regarding such personal data.

In particular, you must not, save in the proper performance of your duties during your employment, make use of, divulge or communicate to any person (including any person working for or with Squash Wales or any organisation, company and/or firm, any personal data or sensitive personal data relating to any third parties, including without limitation the following:-

- applicants for employment with Squash Wales (successful and unsuccessful);
- employees and former employees of the Squash Wales
- other individuals who are doing work or have done work for Squash Wales;
- current and former committee members, **SQW Board of Directors**, volunteers, players, athletes, officials.



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

6. Employee Rights

On certain grounds, you are entitled to prevent Squash Wales from processing information or require that processing is stopped if the processing or the purpose for which the data is processed is causing or is likely to cause substantial damage or distress to you, or another, and that damage or stress is, or would be, unwarranted.

If you consider that the processing of your data will cause damage or distress, you should notify your line manager. Squash Wales will respond to you within 21 days confirming that the data will not be processed, or providing reasons why preventing the processing of personal data would be unjustified.

The DPA gives employees certain rights in connection with personal and sensitive personal data which relate to them. In particular you are entitled 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 mike.workman@squash.wales

If, on investigation, it is found that personal data is inaccurate, you are entitled to have the inaccurate data removed or corrected. You will receive written confirmation that this has been done where appropriate.

7. Responsibility

If you would like more information about this policy please contact mike.workman@squash.wales .

8. Revision of Policy

This policy is not intended to be contractually binding. Squash Wales reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or operational requirements.