**How to Create a Data Management Plan**

***This document needs to be amended as required to suit your specific needs***

* *Change the logo in the Header to your own*
* *Use the select all then replace all to amend the document for your insert NGB*
* *If your insert NGB is an unincorporated organisation i.e. not a Company replace all reference to the Board of Directors with the name of your insert NGB governing committee e.g. Executive or Management Group*
* *If your insert NGB is a charity your governing group may be the Trustees or similar*

**See Data Protection Outline document in the WSA Templates for further information and assistance.**

| **Data Protection and Management** |
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| **Policy information** |
| **Organisation** | **Insert NGB Name** | **Additional notes** |
| **Scope of policy** | This policy as adopted applies to all officers, committee members, coaches, team managers and volunteers  | Amend list of people as required to suit specific needs of insert NGB and include employees as well if appropriate – remember to link to employee handbook |
| **Policy operational date** | First Draft circulation ……*insert date*….. Policy to be adopted immediately following approval. |  |
| **Date approved by the Board/Executive** | Insert | Circulation prior to approval ………… Board/Executive members to return comments to …..by…..*insert name and date* |
| **Policy review date** | Every 2nd year following its approval date or sooner if required | Responsibility of ……*insert person*  |
| **Category**  | **insert NGB regulations** | **Additional notes** |
| **Purpose of policy** | The purpose of this policy is to enable the insert NGB to:* comply with the law in respect of the data it holds about individuals;
* follow good practice;
* protect the insert NGB’s officers, athletes and other individuals associated with our sport;
* protect the insert NGB from the consequences of a breach of its responsibilities
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| **Data Protection Principles** | See Introduction above |
| **Personal data** | This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data Protection Act, by virtue of not meeting the strict definition of ‘data’ in the Act. |  |
| **Policy statement** | The insert NGB commits to:* comply with both the law and good practice
* respect individuals’ rights
* be open and honest with individuals whose data is held
* adopt a policy on the secure storage, handling, use, retention and disposal of information including Disclosure Information in accordance with DBS
 | The policy may be simpler but should contain reference to the four bullet points. |
| **Code of Practice** | The insert NGB recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. In the main this means keeping information securely in the right hands. | Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account.  |
| **Key risks** | The main risks within the insert NGB fall in two key areas:* information about individuals getting into the wrong hands, through poor security or inappropriate disclosure of information
* individuals being harmed through data being inaccurate or insufficient
 | The insert NGB has identified the following potential key risks, which this policy is designed to address:* Breach of confidentiality
* Insufficient clarity about the range of uses to which data will be put — leading to volunteers and athletes being insufficiently informed
* Failure to offer choice about data use when appropriate
* Breach of security by allowing unauthorised access
* Failure to establish efficient systems of managing changes to our volunteers and athletes leading to personal data not being up to date.
* Harm to individuals if personal data is incorrect
* Insufficient clarity about the way personal data is being used e.g. given out to general public/media.
* Information given out on a website
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| **Responsibilities** |
| **Category/Person** | **Additional notes** |
| **Board/Executive** | Board/Executive has overall responsibility for ensuring that the insert NGB complies with its legal obligations. insert NGB needs to agree who (can be more than one) will be the named Data controller – this is important if insert NGB decides to register with the ICO | Include details in the Board/Executive annual delegation authority |
| **Data Controller** | The responsibilities of the Data Controller include:* Briefing the Board on Data Protection responsibilities
* Reviewing Data Protection and related policies
* Advising other staff/volunteers on tricky Data Protection issues
* Ensuring that Data Protection induction and training takes place if deemed necessary
* Handling subject access requests
* Approving unusual or controversial disclosures of personal data
* Approving use of data by other Data Processors
 | If requested, the Data Controller must comply with a police authority to provide required details |
| **Website Manager** | Where personal data is handled via the website or similar such as online affiliation, the Website Manager should be responsible for electronic security and for approving any Data Protection related statements on web materials  | e.g. secure part of site – password protection, issue of logins etc. |
| **Managers of Athletes** | All volunteer and/or paid Managers should be required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their duties for insert NGB. This may include athletes’ names, addresses and other contact details as well as medical information. | All athlete managers (e.g. coaches, physio/doctors, Team Managers, Chair of Committees etc.) are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their duties.  |
| **Child Protection Officer** | Refer to insert NGB safeguarding information using suitable wording taken from the applicable regulations.*Ensure this is kept up to date – can be achieved using a link to the safeguarding on the website rather than actual updating of this document.* | Note about club welfare officers – link to GB/International websites if appropriate |

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| **Agreed by the Board** | Insert date |
| **Communicated as required** | Insert date |
| **Version Number** | Insert V number |
| **Next review date** | Insert date |