

Disability Sport Fife (SCIO)



Data Protection and Privacy Policies and Procedures

Updated and Approved by
DSF(SCIO) Board of Charity Trustees February 2021

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1.0 Data Protection Policy – Trustees, Staff, Coaches

Disability Sport Fife (SCIO) Data Protection Policy – Trustees, Staff, Coaches

1.1 What is Data Protection?

Disability Sport Fife is committed to ensuring the safety and protection of any personal data, or sensitive personal data, which we process. This includes collection, storage, organising, amendment, deletion and sharing. Personal data refers to any data which can identify a living individual, or which in conjunction with other information likely to come into the possession could identify a living individual. For DSF purposes this covers:

- Name.
- Address.
- Telephone number.
- Email address and/or IP address.
- Racial or ethnic origin.
- Religious or similar beliefs.
- Physical or mental health condition including disability.

The Data Protection Act 1998, General Data Protection Regulations 2018, and UK Data Protection Bill (once this becomes an Act)

The legislation sets rules for processing data and applies to manual filing records and data held on computers.

DSF is a data controller which means we determine the purposes for which personal data is processed. From time to time we may employ data processors, which means any person or organisation other than a direct employee who will process data on our behalf. Under these circumstances DSF will ensure the data processor has a valid contract requiring compliance with all existing legislation and DSF remains legally liable for the data processing.

Data protection legislation provides eight data protection principles which require that personal data:

1. Shall be processed fairly and legally, meaning we are open and transparent about how data will be processed and a privacy notice must be available.
2. Shall be processed only for specified and lawful purposes and not be processed in a way which is incompatible with those purposes.
3. Shall be adequate, relevant, and not excessive for the purposes for which it is collected.
4. Shall be accurate and kept up to date.
5. Shall not be kept longer than necessary.
6. Shall be respectful of individuals' rights.
7. Shall be kept secure by technical and organisational means against unauthorised and unlawful processing and against accidental loss, destruction, or damage.
8. Shall be transferred outside the European Economic Area, e.g., through websites, only if privacy is respected.

DSF is registered as a data controller with the Information Commissioner's Office must by law keep to these principles. If you believe in any way that DSF is not processing personal data in

accordance with these principles, please contact the DSF Chairman, Richard Brickley, OBE MBE at richard.brickley@fife.gov.uk or 03451 555555 Ext 444989.

1.2 Purposes for Collecting Personal Data

All personal data provided to DSF is processed in accordance with the principles of existing legislation. DSF collects personal data for:

- Entry to DSF events, programmes, squads, or courses.
- Monitoring the delivery of DSF programmes and resources.
- Research, development, and evaluation of DSF programmes and resources.
- Through a recruitment application form.
- Through an application for grant funding.
- Communication regarding DSF work.
- Marketing of DSF programmes, resources, and registration schemes.
- Human resources and employment.
- Acceptance for inclusion on a mailing list or database.
- As a result of interaction with DSF (e.g., by entering into email or telephone correspondence with an employee of DSF).

Individuals must be adequately informed, in a manner appropriate to their age and understanding, of how DSF will process any personal data collected. If there is an intention to share any personal data with third parties, e.g., sponsors, SGBs, etc. this must be clearly explained to the individual.

Individuals have the right to access the personal data DSF holds on them and correct it if inaccurate. If you would like to receive a copy of this data please provide a written request evidencing who you are and the information you wish to access to disabilitysportfife@fifeleisure.org.uk

1.3 Passing personal data onto third parties

DSF will only disclose information to third parties if explicitly required to do so by relevant legislation. In this case, consent of the individual must be obtained before passing on any information to any third parties other than those involved in the co-ordination of DSF programmes.

DSF will not collect or compile personally identifying information for dissemination or sale to external parties for marketing purposes or host mailings on behalf of third parties.

Data Protection Breaches

Any breach of data protection must be reported immediately to Richard Brickley, OBE MBE, Chairman, DSF (SCIO) or in his absence Paul Noble, MBE, Honorary Treasurer, DSF (SCIO). Breaches are loss or damage, or potential loss or damage, to data and include such circumstances as loss or damage to a computer or smartphone.

All breaches must be reported to the Information Commissioner's Office within 72 hours, including weekends and nights, or there is potential for a significant fine which will rise to €2,000,000 with the introduction of the GDPR.

2.0 Data Protection Policy – Participants/Athletes

Disability Sport Fife (SCIO) Data Protection Policy – Participants/Athletes

2.1 What is Data Protection?

Disability Sport Fife (SCIO) is committed to ensuring the safety and protection of any personal data, or sensitive personal data, which we process. This includes collection, storage, organising, amendment, deletion and sharing. Personal data refers to any data which can identify, or is likely to identify, a living individual. For our purposes this covers:

- Name.
- Address.
- Telephone number.
- Email address and/or IP address.
- Racial or ethnic origin.
- Religious or similar beliefs.
- Physical or mental health condition including disability.

Data protection legislation sets rules for processing data, either on paper or held on computer.

DSF is a data controller which means we determine the purposes for which personal data is processed. From time to time, we may employ data processors, which means any person or organisation other than a direct employee who will process data on our behalf. Under these circumstances DSF will ensure the data processor has policies and procedures in place which comply with all existing legislation.

Data protection legislation provides eight data protection principles which require that personal data:

1. Shall be processed fairly and legally, meaning that we will be open and transparent about how personal data will be used and we will provide a privacy notice.
2. Shall be processed only for specified and lawful purposes and not be processed in a way which is incompatible with those purposes.
3. Shall be adequate, relevant, and not excessive for the purposes for which it is collected.
4. Shall be accurate and kept up to date.
5. Shall not be kept longer than necessary.
6. Shall be respectful of your rights.
7. Shall be kept secure against unauthorised and unlawful processing and against accidental loss, destruction, or damage.
8. Shall not be transferred outside the European Economic Area unless we can guarantee your privacy will be respected.

If you believe in any way that DSF is not processing your personal data in accordance with these principles, please contact **DSF Chairman, Richard Brickley, OBE MBE** richard.brickley@fife.gov.uk or on **03451 555555 Ext 444989**. If you remain dissatisfied you have the right to contact the Information Commissioner's Office to make a complaint www.ico.org.uk.

2.2 Purposes for Collecting Personal Data

All personal data provided to DSF is processed in accordance with the principles of existing legislation. DSF collects personal data for:

- Entry to events, programmes, squads, or courses.
- Monitoring the delivery of our programmes and resources.
- Research, development and evaluation of our programmes and resources.
- Through a recruitment application form.
- Through an application for grant funding.
- Communication regarding our work.
- Marketing of our programmes, resources, and registration schemes.
- Human resources and employment.
- Inclusion on a mailing list or database.
- As a result of interaction with DSF (e.g., by entering into email or telephone correspondence with an employee of DSF).

We will ensure that you are informed appropriately of how we will process any personal data collected. If we intent to share any personal data with third parties, e.g., sponsors, SGBs, etc., this will be clearly explained.

You have the right to access the personal data DSF holds on you and correct it if inaccurate. If you would like to receive a copy of this data please provide a written request evidencing who you are and the information you wish to access to disabilitysportfife@fifeliesure.org.uk

2.3 Passing personal data onto third parties

It is DSF policy to only disclose information to third parties if explicitly required to do so by relevant legislation.

DSF will obtain your consent before passing on any information to any third parties other than those involved in the co-ordination of DSF programmes.

DSF does not collect or compile personally identifying information for dissemination or sale to external parties for marketing purposes or host mailings on behalf of third parties.

2.4 Privacy Notice

Our full privacy notice is available to view on the DSF website or Section 6 of the DSF Data Protection and Privacy Policies and Procedures:

www.fifeliesure.org.uk/sports/disabilitysportfife

If you would like to receive a copy please contact us on 03451 555555 Ext 444989, email disabilitysportfife@fifeliesure.org.uk or write to us at Disability Sport Fife (SCIO), Michael Woods Sports Centre, Viewfield, Glenrothes, Fife KY6 2RD.

3.0 Social Media Policy

Disability Sport Fife (SCIO) Social Media Policy

Social media is changing the way Disability Sport Fife (DSF) communicates.

This policy has been developed to inform our community about using social media so people feel enabled to participate, while being mindful of their responsibilities and obligations. In particular, this policy provides practical guidance allowing all parties to benefit from the use of social media, while minimising potential risks and protecting those involved.

This policy assists to establish a culture of openness, trust and integrity in all online activities related to DSF.

This policy contains DSF's guidelines for the DSF community to engage in social media use. It also includes details of breaches of the policy.

3.1 Coverage

This policy applies to all persons who are involved with the activities of DSF, whether they are in a paid or unpaid/voluntary capacity and including:

- persons appointed or elected to DSF (SCIO) Board of Charity Trustees, committees and sub-committees;
- employees of DSF;
- support personnel, including managers, physiotherapists, psychologists, carers, and significant others.
- coaches and assistant coaches.
- athletes and participants.
- referees, umpires, and other officials.
- member Branches
- any individual using an DSF social platform

3.2 Underlying Principles

The essence of this policy is underpinned by DSF's core values of;

- Respect
- Integrity
- Fairness
- Transparency

3.3 Scope

Social media brings us new opportunities to connect and communicate directly with our community. DSF uses social media as;

- A method of amplifying our external communications
- Direct communication with our athletes, volunteers, stakeholders, and partners
- A method of accessing and engaging new audiences and encouraging them to engage with sport and each other
- A vehicle for keeping up to date on current relevant information about sport in Fife and across Scotland as it happens
- A relationship building tool to help communicate and showcase information for our partners and for the good of sport
- A way of learning from each other, exchanging opinion and interacting.

3.4 Social Media

Social media refers to any online tools or functions that allow people to communicate, interact and/or share content involving sharing information, opinions, knowledge, and interests via the internet.

This social media policy applies to platforms including, but not limited to:

- Social networking sites (e.g., Facebook, Twitter, LinkedIn, Google+, Pinterest, Yammer, Zoom, Slack etc)
- Video and photo sharing websites or apps (e.g., YouTube, Vimeo, Instagram, Flickr, Vine, etc)
- Blogs, vlogs, and micro-blogging platforms (e.g., Tumblr, Wordpress, Blogger, etc)
- Review sites (e.g., Yelp, Urban Spoon, etc)
- Live broadcasting apps (e.g., Periscope, Meerkat, Facebook Mentions, etc)
- Podcasting (e.g., iTunes, Stitcher, Sound cloud, etc)
- Geo-spatial tagging (e.g., Foursquare, etc)
- Online encyclopaedias (e.g., Wikipedia, etc)
- Instant messaging (e.g., SMS, Skype, Snapchat, WhatsApp, Viber, etc)
- Online multiplayer gaming platforms (e.g., World of Warcraft, Second life, Xbox Live, etc)
- Online voting or polls
- Public and private online forums and discussion boards
- Any other online technologies that allow individual users to upload and share content.

This policy is applicable if using social media when:

- using DSF's platforms
- representing DSF on social media; and
- if you are posting content on social media in relation to DSF that might affect DSF's business, products, services, events, sponsors, members, or reputation.

NOTE: This policy does not apply to the personal use of social media where it is not related to or there is no reference to DSF or its business, competitions, teams, participants, products, services, events, sponsors, members, or reputation. However, any misuse of social media in a manner that does not directly refer to DSF may still be regulated by other policies, rules, or regulations of DSF.



3.5 Accessing social media at work

As a part of DSF's, community you are an extension of the DSF brand.

As such, the boundaries between when you are representing yourself and when you are representing DSF can often be blurred. This becomes even more of an issue as you increase your profile or position within DSF. Therefore, it is important that you represent both yourself and DSF appropriately online at all times.

3.6 Guidelines

You must adhere to the following guidelines when using social media related to DSF or its business, products, competitions, teams, participants, services, events, sponsors, members, or reputation.

3.7 Use common sense

Whenever you are unsure as to whether or not the content you wish to share is appropriate, seek advice from others before doing so or refrain from sharing the content to be on the safe side.

When using social media, the lines between public and private, personal, and professional, may be blurred. Remember, you are an ambassador for DSF.

3.8 Protecting your privacy

Be smart about protecting yourself and your privacy.

When posting content online there is potential for that content to become publicly available through a variety of means, even if it was intended to be shared privately. Therefore, you should refrain from posting any content online that you would not be happy for anyone to see, even if you feel confident that a particular individual would never see it.

Where possible, privacy settings on social media platforms should be set to limit access. You should also be cautious about disclosing your personal details.

3.9 Honesty

Your honesty—or dishonesty—may be quickly noticed in the social media environment. Do not say anything that is dishonest, untrue, or misleading. If you are unsure, check the source and the facts before uploading or posting anything. DSF recommends erring on the side of caution – if in doubt, do not post or upload.

Do not post anonymously, using pseudonyms or false screen names. Be transparent and honest. Use your real name, be clear about who you are and identify any affiliations you have.

If you have a vested interest in something you are discussing, point it out. If you make an endorsement or recommendation about something you are affiliated with, or have a close relationship with, you must disclose that affiliation.

The web is not anonymous. You should assume that all information posted online can be traced back to you. You are accountable for your actions both on and offline, including the information you post via your personal social media accounts.

3.10 Use of disclaimers

Wherever practical, include a prominent disclaimer stating who you work for or are affiliated with DSF and that anything you publish is your personal opinion and that you are not speaking officially. This is good practice and is encouraged, but don't count on it to avoid trouble — it may not have legal effect.

3.11 Reasonable use

If you are an employee of Disability Sport Fife, you must ensure that your personal use of social media does not interfere with your work commitments or productivity.

3.12 Respect confidentiality and sensitivity

When using social media, you must maintain the privacy of DSF's confidential information. This includes information that is not publicly accessible, widely known, or not expected to be shared outside of DSF.

Remember, if you are online, you are on the record—much of the content posted online is public and searchable.

Within the scope of your authorisation by DSF, it is perfectly acceptable to talk about DSF and have a dialogue with the community, but it is not okay to publish confidential information of DSF.

When using social media you should be considerate to others and should not post information when you have been asked not to, or where consent has not been sought and given. You must also remove information about another person if that person asks you to do so.

Permission should always be sought if the use or publication of information is not incidental, but directly related to an individual. This is particularly relevant to publishing any information regarding minors. In such circumstances, parental or guardian consent is mandatory.

3.13 Gaining permission when publishing a person's identifiable image

You must obtain express permission from an individual to use a direct, clearly identifiable image of that person.

You should also refrain from posting any information or photos of a sensitive nature. In every instance, you need to have consent of the owner of copyright in the image.

3.14 Complying with applicable laws

Do not post or link to content that contains illegal or indecent content, including defamatory, vilifying, or misleading and deceptive content.



3.15 Abiding by copyright laws

It is critical that you comply with the laws governing copyright in relation to material owned by others and DSF's own copyrights and brands.

You should never quote or use more than short excerpts of someone else's work, and you should always attribute such work to the original author/source. It is good practice to link to others' work rather than reproduce it.

3.16 Discrimination, sexual harassment and bullying

The public in general, and DSF's employees and members, reflect a diverse set of customs, values, and points of view.

You must not post any material that is offensive, harassing, discriminatory, embarrassing, intimidating, sexually explicit, bullying, hateful, racist, sexist, or otherwise inappropriate.

When using social media you are also bound by DSF's Anti-Harassment and Bullying Policy, Data Protection Policy, Ethics Statement, Complaints Policy, HR Handbook and Safeguarding Children, Young People & Adults at Risk Policies and Procedures

3.17 Avoiding controversial issues

If you see misrepresentations made about DSF in the media, this should be referred to the DSF Chairman. Always do so with respect and with the facts. If you speak about others, make sure what you say is based on fact and does not discredit or belittle that party.

3.18 Dealing with mistakes

If DSF makes an error while posting on social media, be up front about the mistake and address it quickly. If you choose to modify an earlier post, make it clear that you have done so. If someone accuses DSF of posting something improper (such as their copyrighted material or a defamatory comment about them), address it promptly and appropriately and if necessary, seek legal advice.

3.19 Conscientious behaviour and awareness of the consequences

Keep in mind that what you write is your responsibility, and failure to abide by these guidelines could put your employment at risk.

You should always follow the terms and conditions for any third-party sites in which you participate.

3.20 DSF branding and intellectual property

You must not use any of DSF's intellectual property or imagery on your personal social media without prior approval from your line manager.

DSF's intellectual property includes but is not limited to:

- trademarks



- logos
- publications
- imagery
- material which has been posted on the DSF official social media sites or website.

You must not create either an official or unofficial DSF presence using the organisation's trademarks or name.

You must not imply that you are authorised to speak on behalf of DSF.

Where permission has been granted to create or administer an official social media presence for DSF, you must adhere to the DSF Branding Guidelines.

3.21 Policy Breaches

Breaches of this policy include but are not limited to:

- Using DSF's name and/or logo in a way that would result in a negative impact for the organisation.
- Posting or sharing any content that is abusive, harassing, threatening, demeaning, defamatory or libellous.
- Posting or sharing any content that includes insulting, obscene, offensive, provocative, or hateful language.
- Posting or sharing any content in breach of DSF's anti-discrimination, racial discrimination, sexual harassment, or other similar policy.
- Posting or sharing any content that is a breach of any state law.
- Posting or sharing any material to our social media channels that infringes the intellectual property rights of others.
- Posting or sharing material that brings, or risks bringing DSF, its affiliates, its sport, its officials, members, or sponsors into disrepute. In this context, bringing a person or organisation into disrepute is to lower the reputation of that person or organisation in the eyes of the ordinary members of the public.

3.22 Reporting a breach

If you notice inappropriate or unlawful content online relating to DSF or any of its members, or content that may otherwise have been published in breach of this policy, you should report the circumstances immediately to the DSF Chairman.

3.23 Investigation

Alleged breaches of this social media policy may be investigated according to procedure as detailed in the DSF Policies and Procedures.

Where it is considered necessary, DSF may report a breach of this social media policy to police.

3.24 Disciplinary process, consequences and appeals

Depending on the circumstances breaches of this policy may be dealt with in accordance with the disciplinary procedure contained in the DSF Policies and Procedures.



Employees of DSF who breach this policy may face disciplinary action up to and including termination of employment in accordance with the DSF Disciplinary Procedure or any other relevant policy.

3.25 Appeals

Any person who is sanctioned under a disciplinary process for breach of this policy may have a right of appeal under the DSF Policies and Procedures.

3.26 Related Policies

- Code of Conduct
- Anti-Discrimination, Harassment and Bullying Policy
- Information Communication (ICT) Policy
- Complaints Handling Policy
- Safeguarding Policies and Procedures
- Data Protection Privacy Policy, including opt-in consents

Other legal considerations that may be applicable include but are not limited to:

- Defamation
- Intellectual property laws, including copyright and trademark laws, Privacy, confidentiality, and information security laws
- Anti-discrimination laws
- Employment laws
- Advertising standards
- Charter of Human Rights and Responsibilities Act 2006
- Information Privacy Act 2000
- Equal opportunity laws
- Contempt of Court
- Gaming laws

4.0 Publications on the Internet

Disability Sport Fife (SCIO) Publications on the Internet Policy

Sport websites and publications provide excellent opportunities to broadcast achievements of individuals and teams to the world and to provide a showcase for disability sport. In some cases, however, displaying certain information about children, young people and adults could place them at risk. The following procedures must be followed to ensure DSF publications and information on the Internet does not place any athlete at risk.

- Publications or information on an internet site must never include personal information that could identify a person e.g., home address, e-mail address, telephone number. Any contact information must be directed to DSF.
- The only identifying information that may be used is the name of a person in a caption alongside a photograph. It is the responsibility of DSF to advise any prospective publisher if the persons' parents/guardians have withheld consent for such information to be included. DSF cannot be held liable for any wrongful use of a persons' name in any publication out with its direct control.
- The matter of consent should be ascertained by asking the parents/guardians to give, or withhold, written consent for such a caption to appear alongside any photograph that may be published. This will require DSF to approach the parent/guardian of every person participating in an event run under the auspices of the DSF. The written instructions of the parents/guardians must be retained by DSF for so long as the person is connected with the Branch.
- The content of photographs or videos must not depict a person in a provocative pose or in a state of partial undress. The reasonable criteria for judging the suitability of a photograph would be that the individual is engaged in normal sports related activity, wearing normal clothing for that sport. Athletes must never be portrayed in a demeaning or tasteless manner.
- Care must be taken in publishing photographs, film, or videos of athletes, who are considered particularly vulnerable, e.g., the subject of a child protection issue or a residence dispute between separated parents.

Important Note:

Any concerns or enquiries about publications or Internet information should be reported to Richard Brickley, OBE, MBE, DSF Chairman on mobile telephone number: 07904 371160, e-mail address: richard.brickley@fife.gov.uk

DSF will work to comply with Fife Council and the Fife Sports & Leisure Trust guidelines.

5.0 Information Communications (ICT) Policy

Disability Sport Fife (SCIO) Information Communications (ICT) Policy

5.1 Introduction

Disability Sport Fife (DSF) is heavily dependent on computer systems to achieve its aims and objectives. ICT covers any product that will process, store, retrieve, manipulate, transmit or receive information electronically in a digital form. For example, personal computers, laptop computers, digital cameras, emails, smartphones, tablets.

This policy provides some guidance on what individual responsibilities are and the processes adopted by DSF. Companies who do not comply with the legal guidelines set down for computer use leave themselves vulnerable to an unlimited fine or imprisonment. It is vital that we all work together to ensure compliance.

Part of your ICT responsibility is to ensure that you show good working practices when using the equipment and do not compromise DSF either ethically or legally. The e-mail system is first and foremost a tool to be used in the context of work. Employees should be aware that a breach of the rules on the ICT Policy could be viewed as gross misconduct and will entitle DSF to take disciplinary action against the relevant member of staff in accordance with disciplinary procedures.

The policy applies to all persons working for DSF or on behalf of the organisation in any capacity including employees at all levels, Trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. This policy does not form part of any employees' contract of employment and we may amend it at any time.

5.2 DSF Services

In DSF terms, ICT is categorised into two broad categories of product:

1. The traditional computer-based technologies, e.g., things you can typically do on a personal computer, laptop, or tablet.
2. Digital communication technologies which allow people and companies to communicate and share information digitally.

Category One includes the following non-exhaustive list of services:

- Software applications, primarily Microsoft Office but including approved database, design, and accounting software. Outcomes include the preparation and distribution of agendas, minutes, letters, reports, presentations, company accounts and emails.

Category Two includes the following non-exhaustive list of services;

- Website administration
- Production of electronic surveys
- Digital voice communications and online meetings
- Online document storage, e.g., Dropbox, OneDrive, Google Docs.
- Online document transfer, e.g. We Transfer, What's App.

- Social Media Communication; and
- Online accounting and HR services

5.3 Managing ICT

The main ICT hub for DSF is Michael Woods Sports & Leisure Centre, Glenrothes which is overseen by the two DSF part time coordinators in consultation with the DSF (SCIO) Chairman. The ICT systems are operated by the DSF (SCIO) part time coordinators. The DSF Chairman also accesses ICT equipment when operating on behalf of DSF. All ICT equipment is owned and maintained by Fife Council and Fife Sports and Leisure Trust.

5.4 Internet

The internet is used for business purposes and for incidental personal purposes. This does not, however, include use which involves substantial expenditure of time not connected with business purposes, use for profit, use to access pornography, or use which would otherwise violate DSF policy.

Employees must ensure that they;

- Do not engage in activities on the internet which might bring DSF into disrepute
- Do act in a transparent manner when altering online sources of information
- Do not use the internet in any way to attack or abuse colleagues
- Do not post derogatory or offensive comments on the internet.

5.5 Social Media

Social media refers to the interaction among people in which they create, share and/or exchange information and ideas in virtual communities and networks. When someone clearly identifies their association with DSF and/or discusses their work, they are expected to behave appropriately when on the internet, and in ways that are consistent with DSF's values and operational policies. Staff and key DSF volunteers will follow DSF Social Media Guidelines when using this medium of communication.

5.6 Email

Email is a primary communication tool, both internally and externally. All email data stored on the Fife Council servers from time to time is the property of DSF and DSF personnel can deal with such data in whatever manner they decide.

Standards to uphold when using email

- Email should be considered as a formal means of communication and should be treated similarly to written or verbal communication. Remember to be polite.
- Do not use email for political or commercial reasons – it should generally be used for business purposes only.
- It is acceptable, within reason, to also use email for personal purposes. Time spent using email for personal purposes should, however, be kept to a reasonable minimum

during business hours and should not involve substantial expenditures of time, use for profit, or use which would otherwise violate DSF policy.

- Files should only be sent by email when there is no alternative to avoid duplication of shared documents.
- Email is not secure – do not use it for confidential information without applying additional protection (e.g., password protect document).
- Do not use DSF's email system to infringe the copyright or other intellectual property rights of third parties.
- Do notify your line manager immediately if you receive email that is inappropriate or offensive.
- Employees should be aware of the types of email likely to be a threat to cyber security.

5.7 Monitoring

DSF may engage in the monitoring of electronic mail messages or other electronic files created by staff for valid business purposes, including employee supervision. DSF may also monitor any email messages or other electronic files created by employees for personal purposes.

5.8 Hardware Purchase and Replacement

An audit of ICT needs will be conducted each financial year to determine the organisation's needs and determine the ICT requirements to meet said needs. DSF will make every effort to replace equipment through Fife Council that falls below the standards required to carry out the associated work for which the equipment is required. Hardware will be disposed of securely by Fife Council.

5.9 Software

DSF will not use illegal copies of software. Software disposal will be undertaken by Fife Council. Staff are discouraged from deleting software programmes themselves. You should notify the Chairman who will arrange the proper deletion of software. Any abuse of ICT equipment or systems by employees will result in disciplinary action being taken.

5.10 ICT Support

Technical support is currently provided by Fife Council and Fife Sports and Leisure Trust. Existing ICT support agreements will be evaluated annually to assess future technical support requirements and ensure cost-efficient services.

5.11 Budgeting for ICT

A budget will be allocated for the preparation of the yearly audit with all other expenditure being dealt with on a project to project basis. Any major purchases will only go ahead when a budget has been identified and approved. In addition to purchasing requirements for that year,

a minimum amount (to be agreed) will be allocated annually to build a fund to replace DSF hardware in conjunction with Fife Council and Fife Sports and Leisure Trust.

5.12 ICT Training

New employees will be expected to have knowledge of ICT as a basic condition of employment. Further employee training needs will be identified during appraisal meetings with employees.

5.13 ICT Risk Assessment

An annual risk assessment of ICT will take place which covers:

- The nature of information.
- That management of information.
- General Data Protection Regulations (GDPR) and the UK Data Protection Act 2018.
- Loss or damage of information.
- Physical theft.
- Unauthorised access to information; and
- User password protection.

5.14 Passwords

Employees are provided with an individual, confidential password or PIN, which they are required to input at the start of each session. Fife Council will ensure that all staff follow the password protection protocol.

- All passwords must conform to Fife Council procedures.

Colleagues' passwords should never be used to gain entry to their computer. Employees should also be aware that they are responsible for the security of their own ICT equipment and should not allow any unauthorised person to use it. If there is any suspicion that password confidentiality has been breached, the employee must contact the Chairman.

5.15 Disclaimers

In order to reduce the risk of prosecution for transmitting incorrect or inappropriate information, all DSF emails are sent with a disclaimer attached. This disclaimer states:

"This document is confidential and intended for the use of the individual(s) to whom it is addressed. If you are not the intended recipient, please inform the sender immediately and be advised that any unauthorised use of this document is strictly prohibited."

However, employees are reminded that the same laws apply to email as any other written document and accordingly employees must avoid sending inaccurate or defamatory statements or inappropriate material under the DSF banner, irrespective of the status of the intended recipient or their relationship to the sender.

5.16 Copyright Laws

Much of what appears on the internet is, or claims to be, protected by copyright. The Copyright, Designs and Patents Act 1988 states that only the owner of the copyright can copy the information and copying without permission, including electronic copying, is prohibited. Employees should be aware that the copyright laws apply not only to documents but also to software and are strongly encouraged to contact Chairman for clarification.

5.17 Security

Keep equipment and data safe.

- Computer equipment and data should only be used for authorised purposes.
- Files, devices, and software should be checked for viruses prior to installation.
- Dispose of confidential waste securely.

Portable computer equipment is a valuable and vulnerable commodity. Common sense should be applied at all times – for example, do not leave a laptop unattended or visible in a car.

5.18 Health & Safety

Office furniture is to be ergonomically suitable and fit for purpose. Employees are to be made aware of issues affecting repetitive strain injury sometimes caused by bad posture.

6.0 Privacy Notice

Disability Sport Fife (SCIO) Privacy Notice

Disability Sport Fife (DSF) is a “controller” of the personal information you provide to us.

6.1 What we need.

When you provide information about yourself for events, courses, workshops, or other opportunities, we will ask you for the following information:

- Contact details including name, address, telephone number, email address and date of birth;
- Details of your role in sport, e.g. coach, athlete, volunteer, official, parent, support staff;
- Equality information including age, disability or medical condition, employment information, ethnic group, religious belief, gender identity and sexual orientation.

6.2 Why we need your personal information.

Contractual purposes

We need to collect personal information in order to manage attendance and participation. We will use this information to:

- Provide you with services such as training or activities;
- Administer your attendance;
- Process awards and qualifications;
- Send you communications in relation to opportunities we think may interest you.

If you do not provide all of the personal information we request then this may affect our ability to offer you services and benefits.

Legitimate purposes

We also process personal information in order to:

- Promote and encourage participation in disability sport by sending communications about forthcoming opportunities. Our events may be photographed or filmed and information captured in this way may be used for promotional and education purposes. You will always be given the option to refuse this;
- Provide opportunities and competition in disability sport by managing entries for events and checking your personal information to ensure you are participating at an appropriate level;
- Monitor and develop participation in disability sport by monitoring engagement and participation and, on occasion, inviting participants to take part in surveys for research and development purposes;
- Develop and maintain qualifications and awards, including sending communications to inform you of forthcoming courses, renewal requirements and to verify that you have completed any mandatory training requirements;
- Respond to and communicate with participants regarding questions, comments,

support needs or complaints in relation to disability sport.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for these purposes. If you wish to object to any of these, please contact DSF on [03451 555555](tel:03451555555) Ext 444989, email disabilitysportfife@fifeleisure.org.uk or write to us at Michael Woods Sports Centre, Viewfield, Glenrothes, Fife KY6 2RD.

6.3 Legal obligations

We are under a legal obligation to process certain personal information for the purposes of complying with:

- The Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults;
- Our **sportscotland** regulatory requirements to report on size, achievements and profile;
- The Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

Equality monitoring requirements

We are required by **sportscotland** to use personal information relating to equality for monitoring purposes.

We will process such personal information through aggregated and anonymised reports to identify and keep under review equality of opportunity or treatment of groups of people, to promote or maintain equality within disability sport.

Other uses of personal information

We may ask you if we can process your personal information for additional purposes. If so, we will provide you with additional information on how we will use your information.

6.4 Who we share your personal information with

If your personal information is included in any images or videos we take, we may share this with partners or governing bodies for promotional purposes.

We may be required to share personal information with statutory or regulatory organisations, such as Disclosure Scotland or Police Scotland.

We may also share personal information with our professional and legal advisors in order to take advice.

Where we share personal information with third parties, we will only share the personal information strictly required for the specific purposes and will take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

We may employ contractors to process personal information. Such contractors are subject to written contracts to only process that information under our instructions, to process and to abide by the restrictions of existing legislation on data protection.

6.5 How long we keep your personal information

We will only keep your personal information for as long as necessary or for as long as we believe you to maintain an interest in disability sport.

We will keep certain personal information for longer in order to confirm your identity.

6.6 Your rights

You can exercise any of the following rights by contacting DSF on [03451 555555 Ext 444989](tel:03451555555), email disabilitysportfife@fifeleisure.org.uk or write to us at Michael Woods Sports Centre, Viewfield, Glenrothes, Fife KY6 2RD:

- The right to request access to the personal information we hold about you by making a “subject access request”;
- The right to have personal information corrected or completed;
- The right to request that we restrict the processing of your personal information for specific purposes;
- The right to request us to delete your personal information.

Any requests received by DSF will be considered under data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk.

7.0 Disability Sport Fife (SCIO) - Contact Details

Disability Sport Fife (SCIO) Policy and Procedure Documents are available to view at;
www.fifeleisure.org.uk/sports/disabilitysportfife

If you would like to receive a copy please contact us on **03451 555555 Ext 444989**, email disabilitysportfife@fifeleisure.org.uk or write to us at Disability Sport Fife (SCIO), Michael Woods Sports Centre, Viewfield, Glenrothes, Fife KY6 2RD.

Any concerns or enquiries regarding the above Policies and Procedures should be reported to Richard Brickley, OBE, MBE, DSF Chairman on mobile telephone number: 07904 371160, e-mail address: richard.brickley@fife.gov.uk