

Data Protection Policy

Purpose

Scottish Rowing handles personal information about members, athletes, young people, coaches, officials, volunteers, staff, event participants and others. Handling it lawfully and carefully is essential to the trust the rowing community places in us.

This policy sets out the standards Scottish Rowing holds itself to in protecting personal information, and what you can expect from us. It supports the delivery of Scottish Rowing: Strategic Plan 2026 and Beyond and its commitment to a safe, welcoming and thriving rowing community.

This policy replaces the Data Protection Policy (2010, last updated July 2021) and the Subject Access Request Procedure (July 2021).

Legal Framework

Scottish Rowing complies with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, together with the Privacy and Electronic Communications Regulations for electronic marketing, and the Disclosure Scotland code of practice for disclosure information. Scottish Rowing (company number SC357505) is registered with the Information Commissioner's Office, registration reference ZA328399.

Scope

This policy applies to everything Scottish Rowing does with personal information, and to everyone who handles it on our behalf - Board and committee members, employees, volunteers, contractors and advisers. Internal procedures set out how our staff put this policy into practice day to day. Affiliated clubs are separate data controllers of their own members' information and are responsible for their own compliance.

Roles and Responsibilities

- The Board is accountable for data protection. It approves this policy and receives an annual report on compliance, including any significant breaches

- The Chief Executive Officer is responsible to the Board for data protection compliance, and reports to the Board annually and on any significant breach
- The Head of Operations is Scottish Rowing's Data Protection Lead and the first point of contact for any data protection matter. Scottish Rowing is not required to appoint a statutory Data Protection Officer
- The Lead Wellbeing and Protection Officer manages wellbeing and protection records, which carry the highest sensitivity and the most restricted access
- Everyone handling personal data for Scottish Rowing is responsible for following this policy and completing training appropriate to their role

The Data Protection Principles

All handling of personal information follows the seven principles of UK GDPR.

Personal data is:

- processed lawfully, fairly and transparently
- collected for specified, explicit and legitimate purposes, and not used incompatibly with them
- adequate, relevant and limited to what is necessary
- accurate and kept up to date
- kept no longer than necessary (see the Retention Schedule at Appendix A)
- kept secure, with protection against unauthorised access, loss or damage and Scottish Rowing maintains the records, notices and training needed to demonstrate compliance (accountability).

Lawful Bases and Special Category Data

Every use of personal data rests on a lawful basis: performance of a contract, legal obligation, legitimate interests, consent, or (rarely) vital interests or public task. Our privacy notices set out the bases we rely on for each audience.

Special category data (such as health and equality information) and criminal-records data (PVG and disclosure information) require an additional legal condition. Scottish Rowing relies principally on the employment, safeguarding, sports anti-doping and equality-monitoring conditions in Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018, and maintains the Appropriate Policy Document required by Schedule 1, which is available to the Information Commissioner's Office on request.

How We Tell You What We Do: Privacy Notices

- the Privacy Notice on our website - for members, competitors, volunteers, young people and website visitors, linked from the membership join and renewal journey
- the Staff Privacy Notice - issued with every offer of employment
- the Recruitment Privacy Notice - published with each vacancy
- the CCTV Privacy Notice - for visitors to the Scottish Rowing Centre, referenced on CCTV signage

All notices are reviewed at least annually and whenever our systems or processing change. New processing for a new purpose requires a new or updated notice before it begins.

Your Rights, and How to Use Them

You have the right to access your personal data, to have it corrected, to erasure and restriction in certain circumstances, to object (including to any processing based on legitimate interests), to data portability, and to withdraw consent where consent is the basis. We do not use computer systems to make decisions about you without a person involved - for example, we do not use software to decide selection, membership or funding.

Making a subject access request: what to expect

- Contact us in any way you like - dp@scottish-rowing.org.uk is the best route for anything about your data - and tell us you would like a copy of your personal data. You can ask for everything we hold, or something specific (which is usually faster). No form, no fee, no formality required.
- If we are not sure the request is really from you, we may ask you to confirm your identity - we will only ask for what is proportionate. If your request is very broad, we may ask what you are most interested in, to help us help you; you do not have to narrow it
- You will receive your data, free of charge, within one month, along with an explanation of why we hold it, who we share it with and how long we keep it. If your request is especially complex we can take up to two further months - we will tell you within the first month if so, and why
- Some information may be withheld or redacted where the law allows - most commonly other people's personal data mixed in with yours. We will tell you if we have withheld anything and why, wherever we lawfully can.

- If you are under 18 you can make a request yourself - in Scotland, from age 12 you are presumed able to exercise your own data rights - or a parent or carer can ask on your behalf where appropriate

If something goes wrong

Complaints about how we have handled your personal data should come to the Head of Operations first (dp@scottish-rowing.org.uk): we will acknowledge within 30 days and respond without undue delay. You can also complain to the Information Commissioner's Office at ico.org.uk, or on 0303 123 1113, at any time.

Personal Data Breaches

If personal data is lost, stolen, wrongly disclosed or accessed without authority, Scottish Rowing acts fast: everyone working for us must report a suspected breach immediately, the Head of Operations assesses and contains it, the Information Commissioner's Office is notified within 72 hours where there is a risk to individuals, and we tell affected people without undue delay where that risk is high. Every breach - including those not notified - is recorded, with lessons learned.

Sharing Your Information

- Personal data is shared only where necessary and lawful, and never sold. Regular recipients are listed in our privacy notices
- Service providers processing data on our behalf work under written contracts meeting UK GDPR requirements
- Sharing with other organisations for defined purposes is covered by data sharing agreements where appropriate - including the signed agreement with Children 1st for the Child Wellbeing and Protection in Sport Service and Case Management Support Service
- Safeguarding comes first: disclosures to Police Scotland, social work or other statutory agencies are always made where necessary to protect a child or adult at risk

Sharing Your Information

- Information is held in Scottish Rowing's secure Microsoft 365 environment, with access controlled by role and multi-factor authentication - never in

personal accounts or on unmanaged devices

- Wellbeing and protection records are held with strictly limited access, controlled by the Lead Wellbeing and Protection Officer
- Paper records containing personal data are locked away and securely destroyed when no longer needed
- Staff are trained in secure working, including care with data at events and in public spaces, and personal or confidential data is never entered into public AI tools

Privacy by Design

Before introducing a new system, programme or technology involving significant personal data, Scottish Rowing assesses the privacy impact first - carrying out a Data Protection Impact Assessment where processing is likely to result in high risk to individuals - and builds data protection into the design rather than retrofitting it.

Retention

Personal data is kept no longer than necessary, in line with the Retention Schedule at Appendix A, which is reviewed annually. Deletion is real: records are securely destroyed or anonymised, in all locations including backups within the backup cycle.

Related Policies and Guidance

- Privacy Notice (website); Staff Privacy Notice; Recruitment Privacy Notice; CCTV Privacy Notice
- Child Wellbeing and Protection Policy; Scottish Rowing's adult safeguarding policies and procedures; Recruitment and Selection Policy
- IT, Digital and AI Acceptable Use Policy; Staff Handbook

Review

This policy will be reviewed at least every two years, or sooner in response to legislative, regulatory or organisational change.

Approval

This policy was approved by the Scottish Rowing Board in:
August 2026

Next review due:
August 2028

Replaces: Data Protection Policy (2010, updated July 2021); Subject Access Request Procedure v1.0 (July 2021).



SCOTTISH ROWING

Appendix A - Records Retention Schedule

Periods run from the end of the relationship or the record's creation, as indicated. Records are securely destroyed or anonymised at the end of the period unless a live claim, investigation or legal hold requires longer. Reviewed annually.

Record type	Retention period	Why
Membership and competition administration	6 years after last membership or transaction	Scottish 5-year prescription; HMRC and company records
Competition results and records of the sport	Indefinite	Historical record of rowing in Scotland
Financial and payroll records	6 years	HMRC / Companies Act
Annual leave and holiday pay records	6 years	Employment Rights Act 2025 duty
Employment records	6 years after employment ends	Limitation periods; statutory duties
Recruitment records (unsuccessful applicants)	12 months	Extended tribunal time limits (ERA 2025)
Safety and incident reports - adults	6 years	Personal injury limitation plus margin
Safety and incident reports - involving a child	Until the individual turns 21	Limitation clock starts at 16 in Scotland
Wellbeing/protection - concern records	Until the individual turns 25	Sector safeguarding guidance
Wellbeing/protection - allegations of abuse	Long-term (75 years)	No limitation for childhood abuse claims in Scotland (confirm with Children 1st)
PVG / disclosure content	Not beyond the recruitment decision (max 90 days); outcome record only	Disclosure Scotland code of practice
CCTV recordings	Approximately 6 weeks, then overwritten; longer only for a live incident or proceedings	CCTV Privacy Notice
Email marketing data	Until unsubscribe, plus permanent suppression marker	Consent-based marketing
Rights-request case files and breach log	6 years	Accountability