

SUPPORTING GLIDING CLUBS as they get to grips with GDPR

Alison Randle
BGA Development Officer

alison@gliding.co.uk

Before we go any further... the BGA does not 'advise' - my role is to support clubs and to help guide them through topics like this

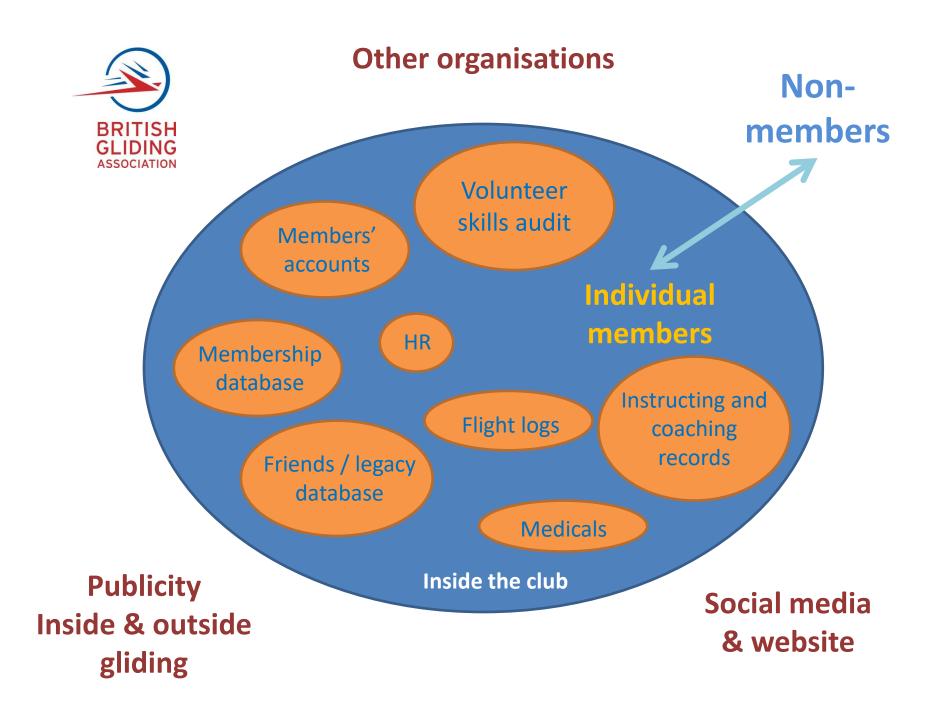
- The Information Commissioner's Office website is excellent
- Take appropriate legal advice from an appropriately qualified professional

In summary

- With 80% of DP problems = human related, this is mainly about good data housekeeping
- Having systems in place that:
 - Can be easily understood
 - Can show that the club has taken appropriate steps
- It is mainly about having a duty of care
 - Don't let it leak
 - Be respectful
 - Be transparent (communicate)

Where are we now?

- 80 clubs across the UK
- Legal entities in their own right
- The clubs are members of the BGA
- Individual pilots join club(s) not the BGA
- Evolved systems little planned structure
- Volunteer run, not-for-profit clubs



Primary issue = data leakage

- Where is the data held?
- How is it processed?
- How can clubs comply?!

If clubs can understand the first two, then the third will be much easier for them

Three phases of guidance

Phase I - mapping

- Mapping personal data held
 - Where & why?
 - How safe are the containers?
- How is that data processed now?
- Who is on which database?
 - Current members
 - Friends (legacy) database
 - What needs deleting / getting consent

Phase II - actions

Legal bases & identifying need for consent

(what we reckon so far...)

LEGAL BASIS

- Flight logs
- A/C logbooks
- Medical information
- CP / VA
- HR & Employment
- Financial accounts

CONSENT

News & events for:

- ex-members
- Non-members

FULFILLING A CONTRACT

- Membership database
- Members accounts & financial records
- Instructing & coaching records
- Volunteer database & skills audit
- Club events

Sporting activity:

- Ladder
- Website & social media
- Articles in local press, S&G etc
- Interclub league
- Competitions

?! Club events – ICO say this could be marketing

Phase II - actions

- Legal bases and identifying need for consent
- Mitigating leakage risk
 - IT solutions (antivirus; security patches etc up to date)
 - Removal of data from ex-volunteers
 - Training people NOT to click on dodgy links...
- Developing good data handling habits (avoiding overly complicated solutions)
- How to respond to requests:
 - Deletion (and safe disposal)
 - Provide a copy of data held
- Planning for future reviews (and making notes for successors)

Phase III - compliance

- (Preferably signposting to) Generic documents to adapt and drop into the club processes:
 - Sport specific; or
 - Airsport specific; or
 - Gliding specific
- Club support:
 - Discussion workshops
 - Individual club support
 - Phone; email; telecon
 - Club visits

GDPR brings opportunities to improve club health

