



EXTRACTED FROM THE BRITISH ROWING STAFF HANDBOOK

1. HEALTH AND SAFETY AT WORK

GENERAL STATEMENT IN ACCORDANCE WITH THE HEALTH AND SAFETY AT WORK ACT 1974

1. British Rowing (the Association) is committed to providing for the health, safety and welfare of all employees and others as required by law.
2. British Rowing will observe the Health and Safety Work Act 1974 and all relevant regulations and codes of practice made under it from time to time. It will take into account any recommendations made by the Health and Safety Executive with regard to health and safety issues and where appropriate will liaise with the Health and Safety Executive on particular health and safety issues which are of particular relevance to the Association.
3. This commitment to health and safety is a management responsibility equivalent to that of any other management function. It will be the duty of the Association and the Executive Committee to fulfil the commitment.
4. British Rowing will conduct its undertaking in such a way as to ensure, so far as it is reasonably practicable, that persons not in its employment who may be affected are not exposed to risks to their health and safety.
5. British Rowing is responsible for:
 - 5.1 Assessing the risk to the health and safety of employees and others who may be affected and identifying what measures are needed to comply with its health and safety obligations.
 - 5.2 Providing and maintaining locations, equipment, protective clothing and systems of work that are safe and without risks to health.
 - 5.3 Ensuring that all necessary safety devices are installed and maintained on equipment.
 - 5.4 Providing information, instruction, training and supervision in safe working methods and procedures.
 - 5.5 Providing and maintaining a healthy and safe place of work and providing a means of access and egress there from.
 - 5.6 Promoting the co-operation of employees to ensure safe and healthy conditions and systems of work by discussion and effective consultation.
 - 5.7 Establishing emergency procedures as required.
 - 5.8 Monitoring and reviewing the management of health and safety at work.
 - 5.9 Keeping this safety policy under review and making any revision it deems necessary from time to time. All such revisions will be brought to the attention of employees.



6. The Association's Health and Safety policy needs the full co-operation of all employees who are expected to give all possible assistance aimed at its successful implementation, to take reasonable care for their own safety and that of others in order to achieve this end, every employee must:
 - 6.1 Comply with any safety instructions and directions issued by the Association.
 - 6.2 Take reasonable care for their health and safety and the health and safety of the members and other persons (e.g. other employees, contractors, other members, etc) who may be affected by their acts or omissions at work, by observing safety rules which are applicable to them.
 - 6.3 Co-operate with the Association to ensure that the aims of the Health and Safety Policy are achieved and any duty or requirement imposed on the Association by or under any of the relevant statutory provisions is complied with.
 - 6.4 Report and co-operate in the investigation of all accidents or incidents that have led to or may lead to injury or a dangerous occurrence.
 - 6.5 Use equipment or protective clothing provided in accordance with the training employees have received.
 - 6.6 Report any potential risk or hazard or malfunction of equipment to the appropriate Line Manager.
7. Any failure by an employee to comply with any aspect of the Association's health and safety procedures, rules or duties specifically assigned to the employee with regard to health and safety will be regarded by the Association as misconduct which will be dealt with under the terms of the Association's disciplinary procedure.
8. Certain members of staff have specific responsibilities to ensure that the Association's health and safety is maintained at all times.
9. The allocation of responsibility within the Association for health and safety matters is as follows:
 - 9.1 The Chairman has overall and final responsibility for giving effect to this health and safety policy.
 - 9.2 The Senior Management Team is responsible for ensuring that there is consultation on health and safety matters with staff in order to maintain health and safety at work.
 - 9.3 The Senior Management Team is responsible for the implementation and monitoring of health and safety policies.
10. Managers are responsible for the implementation of the health and safety policies in the areas under their control.
11. All employees have the responsibility to observe all safety rules and to co-operate with the manager charged with responsibility for the implementation of the Association's health and safety policy to achieve a healthy and safe workplace and to take reasonable care of themselves and others.

In particular:

- i) staff should not proceed to the Association car park after dusk, unless accompanied and do so at their own risk; and



- ii) staff should not use the boathouse as a right of way and do so at their own risk.
12. There are several trained First Aiders throughout the premises. Lists of First Aiders are on the Association's notice boards and are identified as such in the internal telephone directory.
 13. If you suffer any accident on the Association's premises you (or someone on your behalf) must report that fact to the Senior Management Team as soon as practicable after the event. All accidents should be reported, however trivial. The accident will be recorded in the Association's Accident Book which is kept in the Reception.



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7. DATA SECURITY

The Association is committed to responsible data processing in accordance with its legal obligations as a registered data controller under the Data Protection Act 1998 ("the Act") and associated codes of practice issued by the Information Commissioner. The Act enhances the rights of individuals (including students, staff and any other individuals associated with the Association) in respect of information held about them by the Association. Staff owe a duty of care to the Association when processing data about students, other employees or other individuals and advice from line managers should always be sought in any case of uncertainty.

The Association takes the privacy and security of its staff members' and Members' data seriously. The aim of this data protection policy is to ensure that all individuals about whom the Association processes data are properly informed about the effect of the Act in respect of both their rights and their obligations.

1. IMPORTANT DEFINITIONS FROM THE ACT

"Personal Data"	means data which relates to a living individual who can be identified from that data or from that data and other information in the possession of the Association. This includes expressions of opinion and any indication of the intentions of the Association or any other person in respect of the individual. "Data Subject" means an individual who is the subject of personal data. This must be a living individual
"Processing of Personal Data"	means obtaining, recording or holding data or carrying out any operation on the information. In practice this will include almost any action involving personal data, including: organising, retrieval, disclosure and erasure/destruction of such data
"Sensitive Personal Data"	means any data concerning a Data Subject's race or ethnic origin; political opinions; religious beliefs or other beliefs of a similar nature; trade union membership; physical or mental health; sexual life or the commission (or alleged commission) of any offence or proceedings for an offence. Additional rules apply under the Act to processing of Sensitive Personal Data
"Data Controller"	means a person who determines the purposes for which and the manner in which personal data is to be processed. This will be the Association when it processes data. "Data Processor" means a person or organisation (not being an employee of the Association) who processes data on behalf of the Association



2. WHAT SORT OF DATA DOES BRITISH ROWING HOLD AND HOW DOES IT OBTAIN IT?

Generally, the Association receives information about individuals from one or more of the following sources:

- 2.1 directly from individuals themselves, for example when potential employees or Members apply for a position with the Association or to join as a member or subsequently during the course of that employment or their membership. This may include data such as name, address, date of birth, telephone number, career or educational history, health record, bank account details;
- 2.2 from third parties, for example, by means of a reference from previous employers or academics;
- 2.3 from third parties or individuals themselves in connection with the marketing and promotion of the Association and its activities;
- 2.4 occasionally from individuals' legal and/or financial representatives.

3. FOR WHAT PURPOSES DOES THE ASSOCIATION USE THIS DATA?

The Association uses this data for a number of purposes, examples of which are outlined below:

- 3.1 to administer and maintain staff records for the purposes of fulfilling the contract of employment (e.g. running the payroll);
- 3.2 to administer and maintain member records for the purposes of member selection; providing coaching services; career services; member association services;
- 3.3 to maintain such records as may be required by legislation (eg health and safety and employment legislation);
- 3.4 to respond to any query that individuals may raise with the Association about matters relating to their employment, their training or any other matter;
- 3.5 to disclose information about employees and former employees or members and former members to future employers for reference purposes;
- 3.6 to keep employees and former employees informed (by post, telephone or e-mail) about matters relating to their employment or pension;
- 3.7 to keep members informed (by post, telephone or e-mail) about relevant matters relating to the Association;
- 3.8 to use information about staff and members for the purposes of management planning and forecasting, research and statistical analysis;
- 3.9 to disclose information to other companies and organisations associated with the Association, including overseas associated companies and organisations, where appropriate;
- 3.10 to market and promote the Association and its activities worldwide;
- 3.11 to disclose information about individuals in response to legislative/court orders.



4. CARING FOR INDIVIDUALS' DATA

- 4.1 The Association owes certain obligations to individuals about whom it processes Personal Data, and such individuals have certain rights in relation to that data. Similarly, individuals employed by the Association or members may at some stage be involved in processing Personal Data about other employees, members or other individuals and in doing so they must be aware of their responsibilities to the Association in carrying out any such processing.
- 4.1 The Act requires the Association to adhere to certain standards relating to the gathering, use and disclosure of Personal Data. These standards are set out in the following 'Data Protection Principles'. A breach of one of these Principles could ultimately result in the Association being prohibited from processing data. All individuals at the Association involved in any way in the processing of personal data relating to staff, members or others, must be aware of the Data Protection Principles.

5. THE DATA PROTECTION PRINCIPLES

- 5.1 First Principle: personal data must be obtained and processed fairly and lawfully and must not be processed unless certain statutory conditions are met.

Examples of the statutory conditions are where a Data Subject has given consent to such processing or where processing is necessary for performance of a contract with the Data Subject. In the absence of consent, processing may also be fair and lawful for example where it is (a) in the legitimate interests of the Association and (b) is not unwarranted because it would prejudice the Data Subject's rights or legitimate interests.

More restrictive provisions apply to the processing of "Sensitive Personal Data" (principally the need to obtain explicit consent to processing). In any case of uncertainty as to the fairness or lawfulness of processing, further advice should be sought.

- 5.2 Second Principle : Personal Data shall be held only for one or more specified and lawful purposes.

These purposes are disclosed by the Association to the Information Commissioner and are publicly available. A copy may be obtained on request. Those processing data at the Association should ensure that where consent is obtained for processing, Data Subjects are told of the purposes for which the data will be used.

- 5.3 Personal Data held for any purpose or purposes shall not be used or disclosed in any manner incompatible with that purpose or those purposes.

Data cannot be used any differently from the registered purpose or disclosed to a party other than those notified to the Information Commissioner.

- 5.4 Third Principle : Personal Data held for any purpose shall be adequate, relevant and not excessive in relation to the purpose or those purposes.

Data processed should only be that which is necessary to achieve the specified purpose.

- 5.5 Fourth Principle : Personal Data shall be accurate and, where necessary, kept up-to-date.



Data is considered inaccurate if it is incorrect or misleading as to any matter or fact. Periodic reviews of databases should be carried out and databases must be amended when changes to data are made known to the Association.

- 5.6 Fifth Principle : Personal Data held for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Redundant or out-of-date information should be deleted. Further guidance is available on request.

- 5.7 Sixth Principle: Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.

- 5.8 Seventh Principle: Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction or damage to personal data

Personal Data must therefore be kept secure.

Appropriate security measures must be taken against unauthorised access, alteration, disclosure or destruction of personal data, and against accidental loss or destruction of personal data.

Factors involved when considering whether security measures are appropriate would include the nature of the Personal Data and the potential harm which could result from unauthorised access. It is necessary to consider the place where data is stored both in hard copy and electronically, access to filing cabinets, screens and other computer equipment and back-up procedures. Control over computer passwords is an important aspect of data security and passwords should not be disclosed to others within or outside the Association.

- 5.9 Eighth Principle : Personal Data should not be transferred outside the European Economic Area ("EEA") unless the country concerned provides an adequate level of protection for Data Subjects in relation to the processing of personal data.

Care should be taken to ensure that personal data transferred outside the EEA will be processed by the recipient in accordance with the Data Protection Principles. The Data Subject should be asked to consent to such a transfer and be made aware that his/her personal data may be held under less stringent data protection laws as a consequence. Further advice should be sought in any case of uncertainty.

- 5.10 If any individual is unclear of his/her obligations in processing personal data under the Data Protection Act, he/she should contact the Data Protection Working Group representative from his/her programme office or department at the earliest opportunity.

- 5.11 The Association will endeavour at all times (i) to adhere to the Data Protection Principles; (ii) to ensure Data Subjects are made aware of their rights under the Act and (iii) to process data in accordance with the provisions of the Act.



6. RIGHTS OF DATA SUBJECTS

Data Subjects have certain rights under the Act in relation to the information which the Association holds about them. These rights are set out below:

- 6.1 Access to Personal Data (Subject Access). An individual may request in writing that the Association discloses (i) whether it is processing personal data about him/her, (ii) the purpose(s) for which such data is being processed, and (iii) to whom it may be disclosed. The individual is also entitled to be given copies of that data. There is a standard form Subject Access Request Form that will be supplied on request and which must be returned with the relevant fee (£10) before a Subject Access application will be processed. The Association will provide the information sought, in a permanent form, as at the time of the request, subject to any routine processing continuing between that time and the time of response and subject to any legal exemptions from disclosure. Advice should be sought as to any exemptions that may be applicable in a particular case. Subject Access requests will be met, at the latest, within 40 days of receiving a duly completed standard form and the required fee.
- 6.2 An individual is entitled, by notice in writing, to require the Association to cease (or not to begin) processing personal data on the grounds that it is causing, or is likely to cause, him/her or another substantial damage or distress and that damage or distress is or would be unwarranted. This does not apply where an individual has consented to the processing (although that consent may be withdrawn); the processing is at their request and necessary for entering into, or for the performance of, a contract with the individual; the processing is necessary for compliance with a legal obligation (other than that imposed by contract), to protect an individual's vital interests (e.g. a life or death situation).
- 6.3 An individual is entitled, by notice in writing, to require the Association to ensure that no decision taken by or on behalf of the Association which significantly affects him/her is based solely on the automated processing of their information, for the purpose of evaluating such matters as, for example, job applications, performance at work, or promotion. Individuals are also entitled to require the Association to cease using personal data for the purposes of direct marketing.

7. TELEPHONE, E-MAIL AND INTERNET USAGE AND CCTV MONITORING

- 7.1 Any use of the email or internet at the Association is subject to the current Electronic Communications Policy (see Section 10 of Handbook).
- 7.2 The Association and its staff shall comply with all statutory requirements with regard to its obligations as the controller of a computer network, including the provisions of the Data Protection Act 1998; the Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 and any other relevant legislation that may apply from time to time.
- 7.3 The Association shall not undertake any form of unnecessary email, internet or other communication monitoring. Where monitoring is necessary this shall be carried out only in accordance with the relevant statutory provisions and in accordance with the current Electronic Communications Policy.
- 7.4 Principally, this means that the Association shall only:
 - carry out monitoring to prevent or detect crime; to investigate or detect unauthorised use of the email or internet or use in any way contrary to email



and internet policy or to ensure the effective operation of the network (for example to detect viruses);

- carry out monitoring by way of spot checks rather than engaging in any form of continuous monitoring unless by way of an investigation into suspected misuse of the email/internet;
- monitor as far as possible by automated means to reduce the extent of information available to any person other than the parties to a communication;
- target any monitoring to areas of known risk, rather than any form of widespread monitoring;
- monitor where known misuse poses a significant threat to the students, staff, Association property or administrative efficiency;
- monitor without viewing the content of email communications clearly marked as personal and the Association shall notify staff when access to staff emails by other staff members may occur in their absence from work;
- carry out monitoring for any other reasonably justified purpose.

8. CONTACT DETAILS

The Information Commissioner:

For further information about individuals' rights in respect of the protection of personal data, please contact:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

or telephone 01625 545700 (switchboard)

or fax 01625 524 510

Homepage: www.ico.gov.uk