



Fort Langley Youth Rowing Society Data Protection Guidelines

Adopted by the board 2 Sept 2022

FLYRS have adopted the Rowing BC Safe Sport Policy Manual without change as mandated by Rowing Canada. As a means to adopt the Fort Langley Youth Rowing Society Privacy Policy to our actual local requirements FLYRS has developed these guidelines.

FLYRS members implicitly acknowledge that some disclosure of personal information is necessary for reasons including communications, determination of eligibility, event registration, insurance and membership in Rowing BC and in Rowing Canada Aviron (RCA). No explicit consent is needed to use personal information for those and other obvious reasons. FLYRS aims not to disclose members' personal information beyond what is necessary.

Typical data that is held for rowers includes the rower's name, date of birth, contact information, and rowing history. FLYRS does not typically collect personal data beyond what is required to fulfil our purpose of providing rowing opportunities for our members and employment opportunities for our employees. Any data collected that is not reasonably required for these purposes should only be collected with written consent, or with the consent of a parent in the case of minors.

Rowing generally takes place on public waterways and FLYRS is not responsible for any photographs or video recording made or shared for personal use by spectators, including parents. Nevertheless, no photos or video may be taken where there is a reasonable expectation of privacy. An image consent form must be completed before any images or videos are presented publically, including for promotional purposes including posters and websites.

The FLYRS privacy officer can be contacted for inquiries, questions of data access and complaints:
PO Box 27, Fort Langley, BC V1M 2R7
flyrs.info@gmail.com

The privacy officer is required to implement procedures to protect personal information (Fort Langley Youth Rowing Society Privacy Policy 2.2a). These procedures include:

- The FLYRS secretary should not keep any paper copies of personal information in open areas. They should be stored in a box or file folder when not in use. The box or file folder should be stored in a private location.

- The FLYRS secretary should only keep electronic copies of personal information in password-protected files, folders, computers or storage devices.
- FLYRS members other than the secretary should only have a copy of personal information as it is needed for FLYRS tasks undertaken by FLYRS members. FLYRS members other than the secretary should maintain their copies of personal information with no less security than that required of the secretary.
- Personal information should not be given out without the permission of the subject of the information, although that permission may be implicit as discussed above. Before club contact lists are created, permission of each family to be on the list should be obtained and recorded, even if that permission is a copy of an email message or a note documenting, with a date, a verbal permission.

The privacy officer is required to establish procedures to receive and respond to complaints and inquiries (Fort Langley Youth Rowing Society Privacy Policy 2.2b). These procedures are outlined as Fort Langley Youth Rowing Society Privacy Policy 8.2. A high level consideration of the complaint procedure is given in the FLYRS Safe Sport Guidelines.

The privacy officer is required to record all persons having access to personal information (Fort Langley Youth Rowing Society Privacy Policy 2.2c). Personal information is kept by the FLYRS secretary. Other FLYRS members shall only have access to personal information as needed for FLYRS tasks. In general, persons who are not FLYRS board members or coaches should not have access to personal information. The list of FLYRS board members and coaches is therefore considered, in general, to be the record of persons having access to personal information.

The privacy officer is required to ensure any third-party providers abide by this policy (Fort Langley Youth Rowing Society Privacy Policy 2.2d).

The privacy officer is required to train and communicate to staff information about Fort Langley Youth Rowing Society's Privacy Policy and practices (Fort Langley Youth Rowing Society Privacy Policy 2.2e). All employees should therefore read these FLYRS Data Protection Guidelines.

"[A] Representative is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed." (Fort Langley Youth Rowing Society Privacy Policy 7.1) In practice personal information is typically provided by the subject of the information, or one of their parents, and the information is used for the purposes implicit in the operation of a rowing club. FLYRS does not explicitly record the source of personal information, and does not log every disclosure of personal information because the disclosures are governed by implicit consent and to record every instance of personal information provided to a regatta or used for communication would be unwieldy. FLYRS therefore interprets requirement 7.1 to mean that on request a Representative is entitled to

the records FLYRS has about the source and disclosure of personal information, with the understanding that such records will not normally exist. These guidelines can be provided to anyone requesting information on the disclosure of personal information.



Fort Langley Youth Rowing Society
Image Consent Form

I hereby grant permission to Fort Langley Youth Rowing Society (FLYRS) to use photographs and/or video of me taken on _____ at _____ in publications, news releases, online, and in other communications related to the mission of FLYRS.

Name of subject:	
Name of parent or guardian if subject is under 18 years old:	
Signature of subject or parent or guardian if subject is under 18 years old:	
Address:	
Email address or phone number (optional):	
Date:	