

NPL Hockey DPIA template



This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Submitting controller details

Name of controller	Gordon Evans
Subject/title of DPO	Committee member
Name of controller contact	Gordon Evans

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

The project aims to achieve legitimate interests in coaching, analysis, and development purposes by processing personal data captured by the VEO camera during training sessions and games at NPL Hockey club. The processing involves capturing visual footage of coaches, players, and children participating in the sport. The footage is then used to analyze and improve performance, promote the sport to a wider audience, and contribute to the development of the sport. The processing of personal data is necessary to achieve these legitimate interests, and appropriate safeguards and technical measures are in place to minimize any potential impact on individuals, especially children.

The need for a Data Protection Impact Assessment (DPIA) has been identified due to the potential impact on the privacy and security of personal data being processed. As personal data, including children's data, is being captured and processed, there is a risk of sensitive information being exposed or misused. By conducting a DPIA, the NPL Hockey club can identify and mitigate any potential risks associated with the processing of personal data, ensure compliance with data protection laws, and demonstrate accountability and transparency in the processing of personal data. The DPIA will also help ensure that appropriate safeguards and measures are in place to protect the privacy and security of personal data, especially that of vulnerable individuals such as children.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

The nature of the processing involves the collection, use, storage, and deletion of personal data captured by the VEO camera during training sessions and games at NPL Hockey club. The personal data being processed includes visual footage of coaches, players, children and bystanders participating in the sport. The footage is then used for legitimate interests in coaching, analysis, and development purposes to improve performance and promote the sport. [Extracts of the footage is also used on social media to advertise the club and promote it and the sport. Footage can also be shared with club members who want it for historical purposes.]

The source of the data is the individuals themselves who participate in the training sessions and games. The NPL Hockey club has a legitimate interest in processing this personal data to improve the skills and performance of the coaches and players. The personal data being processed is not shared with anyone outside of the NPL Hockey club unless required by law.

The processing of personal data has been identified as high risk, specifically regarding the processing of children's data. As such, appropriate safeguards and technical measures are in place to minimize any potential impact on individuals, especially children. These measures include limiting access to personal data and ensuring that the personal data is stored securely.

The NPL Hockey club has a clear data retention policy in place, which outlines the retention periods for personal data and the procedures for securely deleting personal data that is no longer needed. The retention period in this case is [insert]. The policy is regularly reviewed and updated as required to ensure compliance with data protection laws. Overall, the processing of personal data is done in accordance with data protection laws, and appropriate safeguards and measures are in place to ensure the privacy and security of personal data without requiring consent from anyone.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The scope of the processing involves the collection, use, storage, and deletion of personal data captured by the VEO camera during training sessions and games at NPL Hockey club. The personal data being processed includes visual footage of coaches, players, children and bystanders participating in the sport. The personal data being processed does not include any special category or criminal offence data.

The amount of data collected and used will depend on the frequency of training sessions and games, but it is expected to be a substantial amount of data. The personal data will be collected and used regularly to support the legitimate interests of coaching, analysis, and development purposes. The NPL Hockey club has a clear data retention policy in place (as above), which outlines the retention periods for personal data and the procedures for securely deleting personal data that is no longer needed.

The number of individuals affected by the processing is likely to be substantial, including coaches, players, and children participating in the sport and bystanders. The geographical area covered by the processing is limited to the training sessions and games taking place at the NPL Hockey club facilities.

Overall, the processing of personal data is limited to visual footage of the training sessions and games and does not include any special category or criminal offence data. The data will be collected and used regularly to support legitimate interests, and appropriate measures will be taken to ensure the privacy and security of personal data, including limiting access to personal data and securely storing personal data in accordance with the NPL Hockey club's data retention policy.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The context of the processing involves the relationship between the NPL Hockey club and the individuals participating in the sport. The NPL Hockey club has a pre-existing relationship with coaches, players, and children participating in the sport, and the personal data being processed is limited to visual footage captured during training sessions and games. Bystanders may also be captured in the footage but they are not the focus of the processing.

The individuals participating in the sport will have control over the use of their personal data, as they can request its removal or deletion as required. The NPL Hockey club has measures in place to inform individuals of the use of their personal data, and individuals can request the removal or deletion of their personal data if they object to being filmed.

Individuals participating in the sport would expect the NPL Hockey club to use their personal data in this way, as it is a common practice in the sport to film training sessions and games to analyze and improve performance.

Children are included in the processing of personal data, and as such, appropriate safeguards and technical measures are in place to minimize any potential impact on them. There are no prior concerns or security flaws associated with this type of processing.

The use of the VEO camera to capture visual footage is not novel, and the technology used is widely available and commonly used in the sports industry. There are no current issues of public concern that need to be factored in.

The NPL Hockey club is not currently signed up to any approved code of conduct or certification scheme, although it will ensure that it complies with data protection laws and industry best practices. Notices will also be displayed to confirm that recording may be taking place.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The purposes of the processing are to support legitimate interests in coaching, analysis, and development purposes by capturing visual footage of training sessions and games at NPL Hockey club using the VEO camera. The intended effect on individuals is to improve their performance and promote the sport to a wider audience.

The benefits of the processing are manifold. For the NPL Hockey club, it provides a valuable tool for improving the skills and performance of coaches and players, as well as for promoting the sport to a wider audience. For the individuals participating in the sport, the processing provides an opportunity to improve their skills and performance and contribute to the development of the sport. More broadly, the processing may contribute to the growth and development of the sport, both locally and internationally.

[Footage will also be used on social media.] It should be noted that the sharing of footage on social media will only include approved footage from authorised persons. The NPL Hockey club will ensure that only approved footage is shared on social media and that the privacy and security of personal data are protected.

Overall, the processing is necessary to achieve legitimate interests in coaching, analysis, and development purposes, and appropriate measures are in place to minimize any potential impact on individuals. The processing of personal data is done in accordance with data protection laws, and appropriate safeguards and measures are in place to ensure the privacy and security of personal data.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

As part of the legitimate interests in coaching, analysis, and development purposes, the NPL Hockey club will capture visual footage of training sessions and games using the VEO camera system. The VEO camera system includes cloud storage of data, which allows team members to view games and download highlights for personal use. Users will be asked to sign terms covering their usage and the downloading of content. Sharing will be prohibited unless there is express written consent.

Individuals participating in the sport or watching will be informed of the use of the VEO camera to capture visual footage of training sessions and games and will have the opportunity to request the removal or deletion of their personal data if they object to being filmed. The NPL Hockey club will also seek the views of coaches and other relevant stakeholders on the use of the VEO camera and the processing of personal data. This will include the location and view of the camera to minimize the capture of unnecessary data.

The NPL Hockey club will involve its data protection officer and relevant staff in the consultation process to ensure compliance with data protection laws and best practices. The club may also consult information security experts or other experts as needed to ensure the privacy and security of personal data, including data stored in the cloud.

The NPL Hockey club will ensure that appropriate safeguards are in place to protect personal data in the cloud, including encryption and access controls. The club will also provide team members with clear guidelines, instructions and terms of use on the appropriate use of the footage and data downloaded from the VEO camera system. This will include a disciplinary process for misuse of any highlights to include nothing is shared on social media unless authorised by the relevant club designated authorities

Overall, the NPL Hockey club will consult with relevant stakeholders as appropriate to ensure that the processing of personal data is done in accordance with data protection laws and best practices. The club will involve its data protection officer, relevant staff, and may consult with information security experts or other experts as needed to ensure the privacy and security of personal data, including data stored in the cloud. The club will also provide team members with guidelines on the appropriate use of the footage and data downloaded from the VEO camera system.

Commented [JS1]: Is this possible to do? It may require you to delete the footage.

Commented [JS2]: You could have a) No downloading/copying b) no use for other purposes c) will keep confidential and secure.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

The NPL Hockey club will process personal data captured by the VEO camera system on the lawful basis of legitimate interests in coaching, analysis, and development purposes. The processing is necessary to achieve these legitimate interests, and appropriate measures are in place to minimize any potential impact on individuals.

The processing of personal data is proportionate to the intended purposes, and the NPL Hockey club will ensure that appropriate safeguards are in place to prevent function creep. The club will also ensure data quality and data minimisation by only capturing the footage necessary for coaching, analysis, and development purposes and regularly reviewing and deleting any unnecessary personal data.

Individuals participating in the sport will be provided with clear and concise information on the use of the VEO camera system to capture visual footage of training sessions and games and their rights regarding the processing of their personal data. The NPL Hockey club will also provide support to individuals in exercising their data protection rights, including the right to access, rectification, erasure, and objection.

The NPL Hockey club does not use processors for the processing of personal data captured by the VEO camera system. However, if processors are used in the future, the club will ensure that appropriate measures are in place to ensure compliance with data protection laws and best practices.

The NPL Hockey club will safeguard any international transfers of personal data by ensuring that appropriate safeguards are in place, such as standard contractual clauses or adequacy decisions by the European Commission or UK government.

Overall, the NPL Hockey club will ensure compliance and proportionality measures by processing personal data on the lawful basis of legitimate interests, preventing function creep, ensuring data quality and minimization, providing clear and concise information to individuals, supporting their data protection rights, and ensuring compliance with data protection laws and best practices.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
<p>The source of risk for the processing of personal data by the NPL Hockey club is the potential for unauthorized access, disclosure, or misuse of personal data captured by the VEO camera system.</p>	Possible	Minimal	Low
<p>When images are used on social media, this could result in a loss of confidentiality.</p>	Possible	Medium	Low
<p>And where Club members have access to the footage or images are shared, there is a risk of dissemination and the footage being used other than for the stated purposes.</p>	Possible	Medium	Low
<p>The potential impact on individuals includes the unauthorised disclosure of personal information, including their image and likeness, which could lead to reputational harm or embarrassment. However, the likelihood of harm is considered possible, and the severity of harm is regarded as minimal to medium. When participants attend session and games, it is regarded that most do so knowing that they are visible to the public and that their images may be captured and used by others. Misuse and sharing of images by Club members is regulated and so considered to be low risk.</p>			
<p>NPL Hockey club will implement appropriate technical and organizational measures to protect personal data, including encryption, access controls, and regular data backups of personal data.</p>			
<p>There are also associated compliance risks for the NPL Hockey club, including potential fines and legal action for non-compliance with data protection laws and best practices. However, the club will ensure compliance with data protection laws and best practices by involving its data protection officer and relevant staff in the consultation process, providing clear and concise information to individuals, supporting their data protection rights, and implementing appropriate technical and organizational measures to protect personal data.</p>			
<p>Overall, while there is a potential risk associated with the processing of personal data, the likelihood and severity of harm is considered low, and appropriate measures are in</p>			

place to mitigate these risks. The NPL Hockey club will ensure compliance with data protection laws and best practices to minimize corporate risks and ensure the privacy and security of personal data.

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
<p>If any risks were identified as medium or high in the previous question, the NPL Hockey club would take additional measures to reduce or eliminate those risks, including</p>	<ol style="list-style-type: none"> 1. Conducting regular security risk assessments and penetration testing to identify and address any vulnerabilities in the VEO camera system or related processes. 2. Implementing two-factor authentication and access controls to restrict access to personal data to authorized personnel only. 3. Regularly reviewing and updating data retention and deletion policies to ensure personal data is only kept for as long as necessary for the intended purpose. 4. Providing regular training and awareness programs for staff and team members on data protection laws and best practices, including the appropriate use and handling of personal data captured by the VEO camera system. 5. Regularly monitoring and auditing access to personal data to detect and prevent any unauthorized access or misuse. 6. Developing and implementing an incident response plan to ensure prompt and effective response to any data breaches or incidents affecting personal data. 7. Having terms over the access to and use of data 	<p>reduced</p>	<p>Low</p>	<p>Yes</p>
<p>Overall, the NPL Hockey club would take a risk-based approach to the</p>				

	<p>processing of personal data captured by the VEO camera system, regularly reviewing and updating measures to address any identified risks and ensure compliance with data protection laws and best practices.</p>			
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Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	GORDON GANS COMMITTEE MEMBER 19/8/23	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	N/A	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	SOLICITOR	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: THIS DPIA has been reviewed and approved by a legal firm.		
DPO advice accepted or overruled by:	N/A	If overruled, you must explain your reasons
Comments: N/A		
Consultation responses reviewed by:	N/A	If your decision departs from individuals' views, you must explain your reasons
Comments: N/A		

This DPIA will kept
under review by:

GORDON EVANS

The DPO should also review
ongoing compliance with DPIA