

## **Kingdom of Ealdormere Data Governance Policy**

### **1. Definitions**

- 1.1. The Kingdom of Ealdormere is a branch of the Society for Creative Anachronisms Inc. (the “SCA”) and includes other branches of the SCA that report to the Kingdom of Ealdormere.
- 1.2. For the purposes of this document, the branch that manages all the branches in the Kingdom of Ealdormere will be referred to as “the Kingdom” or just “Kingdom”, and “Kingdom of Ealdormere” or just “Ealdormere” will be used to refer collectively to the Kingdom and all branches that report to it.
- 1.3. This data policy is a collection of principles that describe the rules to control the integrity, security, quality, and usage of data during its lifecycle. Data policies define the roles and responsibilities of all officers and deputies of an organization, as well as consultants with internal and external parties in relation to data access, retrieval, storage, disposal, and backup of data assets.

### **2. Purpose**

- 2.1. The purpose of the Data Governance Policy is to:
  - 2.1.1. Define the roles and responsibilities for data retention and usage, including specific cases and/or situations, to establish clear lines of accountability.
  - 2.1.2. Outline best practices for effective data management and protection.
  - 2.1.3. Protect the Kingdom of Ealdormere’s data against internal and external threats (for example: unintentional breach of privacy and confidentiality, or deliberate external security breach).
  - 2.1.4. Ensure that Ealdormere complies with all applicable laws, regulations, and standards, as well as SCA policy.
  - 2.1.5. Ensure that a data trail is effectively documented within the processes associated with recording, accessing, retrieving, exchanging, reporting, managing, and storing of data.

### **3. Scope**

- 3.1. This policy applies to all data used to administer the Kingdom of Ealdormere.
- 3.2. This policy applies to data in all formats including, but not restricted to, paper, digital, audio-visual, files, working papers, electronic documents, emails, online transactions, data held in databases or on tape or disks, maps, plans, photographs, sound and video recordings, or microforms.
- 3.3. This policy applies to all Kingdom of Ealdormere officers, deputies, and consultants,
- 3.4. The Kingdom, rather than any individual or branch, is the custodian of the data and any information derived from the data.

#### **4. Data Governance Roles and Responsibilities**

- 4.1. The Privy Council is responsible for the overall management of the Data Governance Policy.
- 4.2. Privy Council is responsible for ensuring that this Data Governance Policy conforms to all applicable laws, regulations, and standards, as well as SCA policy.
- 4.3. All Officers within the Kingdom of Ealdormere, and their deputies, are responsible for following this Data Governance Policy with regards to:
  - 4.3.1. the data relevant to their office; and
  - 4.3.2. ensuring effective protocols are in place to guide the appropriate access and use of the data relevant to their office.
- 4.4. Officers are responsible for keeping their deputies informed of current data security requirements. For example: the Kingdom Seneschal is responsible for informing all group seneschals, and group seneschals are responsible for informing their deputies.

#### **5. Collection, Use, and Maintenance**

- 5.1. It is prohibited to use data covered by this Data Governance Policy for personal reasons, under any circumstances.
- 5.2. Data should only be collected for purposes directly related to administration for the business purposes of the SCA.
- 5.3. Data must be updated in a timely fashion when updates are provided.
- 5.4. Backup for data sources must be tracked in an auditable fashion, showing how and why it was obtained, as directed by the appropriate Officer's Handbook(s). For example:
  - 5.4.1. Backup for attendance data from gate at an event would be the sign-in sheets.
  - 5.4.2. Backup for a donation at gate would be a note from the person who either made the donation or the person who received it, including at least the name of the person who received the donation on behalf of the group if the donation was anonymous (the name of the donor would be preferred).
- 5.5. Retrieval, duplication, manipulation, and sharing of data is permitted only to support administration to conduct the business of the SCA. For example:
  - 5.5.1. It is not permitted to look up contact information for personal reasons not related to carrying on the business of the SCA.
  - 5.5.2. It is not permitted to retain information on the eye colour of people attending an event, as that information is not relevant to any business purposes of the SCA.
- 5.6. Data shall be retained and disposed of in an appropriate manner in accordance with the SCA Privacy Policy, the SCA Data Policy, and associated procedures as outlined the appropriate Officer's Handbooks, all of which can be found online in the SCA Library (<https://www.sca.org/resources/document-library/>).

## **6. Data Security**

- 6.1. Data stored in an electronic format must be protected by appropriate electronic safeguards and/or physical access controls that restrict access only to authorized users.
- 6.2. The clerk-register's office is responsible for keeping Ealdormere up to date on the current trends in data security.

## **7. Issue Management**

- 7.1. In case of an issues regarding data security:
  - 7.1.1. The person who identifies the issue should immediately contact the Kingdom Seneschal.
  - 7.1.2. As per Seneschal guidelines, the relevant officer will work with the Kingdom Seneschal to remedy the situation as quickly as possible, with the goals of:
    - 7.1.2.1. Restoring data security as quickly and efficiently as possible.
    - 7.1.2.2. Dealing with consequences, if any.
    - 7.1.2.3. Making any necessary changes so this issue can be avoided in the future.

## **8. Policy Review**

- 8.1. The Kingdom Clerk-Register will review this Policy every two years, or more frequently as appropriate.
- 8.2. Privy Council will review and approve changes to this Policy.
- 8.3. Persons who wish to discuss or provide feedback regarding this Policy may email the Kingdom Clerk-Register ([ealdormereweb@gmail.com](mailto:ealdormereweb@gmail.com)).