



## **BAVirtual Policy**

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## 0 Preface

Rev. No	Date Entered
1	August 2021

### 0.1 Revision Highlights

#### Aug 2021

BAVirtual Policy superseded the BAVirtual SOP with a full rewrite, and reflects the new rank structure.

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# 1 Membership

## 1.1 Recruitment

Only a Windows 10 operating system running at least one of the following flight simulation applications are supported.

- a) Microsoft Flight Simulator 2004.
- b) Microsoft FSX (including Steam Edition).
- c) Microsoft Flight Simulator 2020.
- d) Prepar3D (v1-5).
- e) X-Plane (v9-11).

On the date of application, applicants must be 16 years of age or over.

Applicants must provide the following details in their application.

- Full legal name.
- A valid e-mail address.
- Date of birth.
- Active VATSIM CID number.

An examination must be successfully completed during the recruitment process.

Applicants who fail the entry examination may resit it once, after 48 hours has elapsed from the unsuccessful attempt.

In the event an applicant fails the examination twice on the same application, the process will terminate. The unsuccessful applicant may not re-apply until 14 days have elapsed from the time of the second examination failure.

New members must join one of the following fleets.

- Airbus A320.
- Airbus A350.
- Airbus A380.
- Boeing 777.
- Boeing 787.
- ERJ (BA CityFlyer).
- BAV Flight Training

Concurrent membership of BAVirtual and other virtual airlines that model themselves on the operations of British Airways is not permitted.

## 1.2 Records

Members are required to maintain their account details ensuring all details remain correct.

Members may hold only one account, irrespective of its status.

## 1.3 Activity Requirements

New accounts will be automatically deleted unless at least one PIREP is filed within 14 days of members passing the entrance exam.

In the event that a new member does not file at least one PIREP within this prescribed period, the account will be terminated and no re-application to join may be submitted until 31 days have elapsed from this time.

Members may log up to 135 duty hours within a rolling 30 day period.

Members who hold the rank of Captain may waive this hour cap for their account.

Members will transfer from an active, to an inactive status 30 days after they last filed a PIREP.

Inactive members will immediately forfeit their seniority number. Upon re-activation, the least senior number will be assigned to the account.

Inactive members will be demoted by one rank every six months until the rank of First Officer is reached.

## **1.4 Administration**

Each member will be allocated a unique BAW identification number upon registration.

Experience points are accrued by members for each PIREP that is filed, based on various criteria including proportion of the flight flown online VATSIM and length of time on-duty. Experience points are passive and do not directly contribute to a member's progression through each rank.

Management may administratively suspend accounts indefinitely where accuracy or completeness is in doubt, until satisfied that the details comply with this policy.

## 2 Discipline

### 2.1 Conduct

Conduct requirements apply to:

- All BAVirtual resources, including but not limited to:
  - The website and forum.
  - The Discord server.
  - Social media accounts or pages.
  - In-person events and meetings connected with BAVirtual.
  - Places where management reasonably believes that BAVirtual may be brought into disrepute.
  - Circumstances that occur in other places, but where management reasonably believe there is a connection to membership with BAVirtual, including but not limited to instances of harassment or bullying.

### 2.2 General requirements

Members must be courteous and polite to others at all times.

Members must not share:

- Pornographic links or material of any kind.
- References or links to illegal software.
- Information that is political in nature.
- Comments or remarks made to intentionally offend, but especially, though not limited to those made in the context of religious preferences, sexual orientation and preferences, gender, local customs and race.
- Content that could reasonably be considered as an advertisement for another virtual airline.
- Training material, without prior management approval.

Members must take all reasonable steps to ascertain the answer to questions they may have using the resources available, prior to asking for help from others.

While flying:

- Members are expected to conduct their flights in a reasonably realistic way and in accordance with normal aviation practices, including and not limited to flight and fuel planning, gate usage and aircraft operation.
- Members must follow the rules of online flying networks (e.g. VATSIM).

Members must take all reasonable steps to follow the published rules for each BAVirtual event, including but not limited to:

- Not disregarding event slot times.
- Not creating an artificial advantage over others in competitions.
- Flying to and from specified airports in approved aircraft types.
- Persistently failing to honour booked slots.

## 2.3 Disciplinary Process

Directors, Chief Pilots and Human Resources Managers (authorised persons) are empowered to initiate investigations and disciplinary action against members if they suspect that the terms of this policy have been breached by another member of BAVirtual. Those persons authorised to take action by this policy must endeavour to minimise potential conflicts of interest and preserve the integrity of the process.

Other Managers are entitled to advise members of the rules and proper conduct, and at their discretion may refer issues to authorised persons for review and action, if the authorised person deems appropriate.

Editorial review of content, such as, but not limited to, the editing, removal, or closure of posts and removal from voice channels on BAVirtual media is not considered a disciplinary action in its own right, and may be undertaken by any Management representative who has been granted access for those purposes.

Action may be informal, or formal.

Informal action may be taken where it is judged that the breach is minor or where formal action may not be appropriate and does not require the direct involvement of the Human Resources Department.

Formal action may be taken where the breach is major, or where several breaches over a period occurred. All cases of formal action require the involvement of the Human Resources Department.

On every occasion informal, or formal action is initiated, the initiator must e-mail the relevant details to:

- The member's registered e-mail address.
- The [disciplinary@bavirtual.co.uk](mailto:disciplinary@bavirtual.co.uk) email account for review and administration purposes.

All disciplinary action must be recorded on the member's record.

When informal action is taken, it may result in any of the following outcomes:

- Cancellation, in light of new information.
- A warning.
- Disconnection from the Discord server.
- Having access to the forum, Discord server, and/or other media modified or temporarily suspended for up to seven days.
- Removal of a PIREP if relevant to the breach.

When formal action is taken, it may result in the following outcomes:

- Cancellation, in light of new information.
- A warning.
- Modification or removal of access to any BAVirtual.co.uk systems, accounts or groups for any period of time, including permanently.
- Demotion to any rank.
- Loss of seniority number.
- Removal of hours and/or PIREPs.
- Removal from a fleet, for example, Concorde.

- For co-pilots, or in the case of a Captain demoted to First Officer or Senior First Officer, categorisation as Category C for a specified minimum length of time.

The process of formal action against a member is as follows:

- The authorised person shall conduct an investigation (the investigator) in the first instance to establish the facts. This may involve speaking to the member who may have breached this policy, and any other person who may have relevant information.
- If the investigator believes that temporary suspension of the member suspected of the breach is required to preserve the integrity and/or security of BAVirtual, they are authorised to make a suspension of up to 21 days.
- When the investigation is complete, or within seven days of a temporary suspension being applied, the result of the investigation must be e-mailed to [disciplinary@bavirtual.co.uk](mailto:disciplinary@bavirtual.co.uk).

A member of the Human Resources Department shall either:

- Personally take the case, unless a member of HR has personally triggered the action.
- Allocate the case to another authorised person in this policy to take disciplinary action. The authorised person must be of the same staff rank as the investigator, or higher.

The authorised person conducting the review (the independent reviewer) must conduct an independent review of the following, and may make requests for further information from any party related to:

- Which part of the policy is alleged to have been breached.
- The strength of the evidence that supports the allegation.
- The prior disciplinary history of the member alleged of breaching the policy.
- That due process has been followed.

The independent reviewer shall then determine and document the outcome within 14 days of a temporary suspension being applied, and any penalties to be applied, communicating it to:

- The member is subject to disciplinary action.
- The authorised person who initiated the disciplinary action.
- [disciplinary@bavirtual.co.uk](mailto:disciplinary@bavirtual.co.uk) such that the HR Department may remove or apply any outcomes to the account within 21 days of the temporary suspension being applied.

Members who are subject to formal disciplinary action are entitled to make an appeal against the outcome (final review).

Appeals must be made by the member within seven days of being notified of the outcome, and must be made by e-mailing [disciplinary@bavirtual.co.uk](mailto:disciplinary@bavirtual.co.uk).

The Chief Executive Officer shall hear all appeals except those where the Chief Executive Officer has prior involvement as investigator or independent reviewer. In such cases, the Human Resources Department shall allocate the appeal to another member of the Board of Directors.

The Chief Executive Officer or other nominated person hearing the appeal is entitled to request any further information as may be required to confirm if the outcome is sound. At



their sole discretion the outcome may be upheld, modified to a reduced penalty, or overturned.

The person hearing the appeal shall document the outcome, and after ratification by the Board of Directors (where applicable) communicate it to:

- The member subject to disciplinary action.
- The initiator of the disciplinary action.
- The independent reviewer of the disciplinary action.
- [disciplinary@bavirtual.co.uk](mailto:disciplinary@bavirtual.co.uk).

All outcomes that after final review have penalties lasting longer than 12 months will be automatically treated as if an appeal had been made, and require a vote by the Board of Directors for it to be upheld.

- The final review must have been conducted first.
- The outcome of the appeal and relevant information must be transmitted to the Board of Directors prior to the next scheduled formal Board meeting and a corresponding item added to the agenda.
- A majority of the Board must vote to uphold the penalty, if no majority exists, the member shall be immediately restored to full member status.

If at any stage of the formal disciplinary process the member subject to action requests their account to be closed, or details to be deleted from BAVirtual, we reserve the indefinite right to refuse any request to re-join.

## 3 Operations

### 3.1 Rank Structure and Seniority

#### 3.1.1 Ranks

The following ranks are utilised by BAVirtual:

- First Officer (FO) - two epaulette stripes.
- Senior First Officer (SFO) - three epaulette stripes.
- Captain (CPT) - four epaulette stripes.

Without exception, on registration all new members will be allocated the rank of First Officer and the lowest available seniority number.

Seniority numbers are regularly automatically re-calculated and new numbers assigned in order of each member's length of active service when they become available.

#### 3.1.2 Promotion

Members will be automatically promoted to the rank of Senior First Officer when the following criteria are met:

- Twelve continuous months as an active member.
- 150 flying hours have been logged.

Promotion to Captain is dependant on the following criteria being met:

- Twelve continuous months as an active member.
- 150 flying hours have been logged.
- 100 sectors have been flown.
- Allocation of Category A status.
- The Moodle command course has been passed.

#### 3.1.3 Pilot Categorisation

All members will be categorised as follows:

- **Category A:** Meets all the requirements for promotion to Captain, subject to completion of the command course.
- **Category B:** Has not yet met the criteria for promotion to Captain.
- **Category C:** Is unsuitable for promotion to Captain for disciplinary or other reasons.

Categorisation shall be managed by the Chief Pilot responsible for the member's allocated fleet.

Chief Pilots are empowered to allocate First Officers and Senior First Officers to and from Category C. This must be justified and provided in writing to:

- The member.
- The Chief Executive Officer.

Members may appeal the allocation of Category C to the Flight Operations Director whose decision shall be final. The outcome of the appeal must be provided in writing to:

- The member.
- The Chief Pilot.

### 3.1.4 Reactivation Following a Period of Inactivity

Members who have been subject to demotion due to inactivity shall be subject to the following criteria to achieve promotion back to the rank they held at the time they went inactive.

Senior First Officers who were demoted to First Officer must maintain 3 months of continuous active status to achieve their original rank.

Captains who have been demoted to First Officer or Senior First Officer shall require:

- 37 hours to be logged.
- 25 sectors to be flown.
- Allocation to Category A.
- Re-completion of the Moodle command course.

The Moodle command course may only be sat when all other criteria have been met, and the member has been allocated to Category A.

### 3.1.5 Co-pilots' Restrictions

First Officers and Senior First Officers are restricted from operating to or from certain more challenging airfields. This list of airfields is maintained by the Operations Department within the BAVMS website and may be amended from time to time based on operational feedback and SESMA data.

## 3.2 Administrative Fleets

The Airbus Chief Pilot is responsible for members allocated to the:

- Airbus A320 fleet.
- Airbus A350 fleet.
- Airbus A380 fleet.

The Boeing Chief Pilot is responsible for members allocated to the:

- Boeing 777 fleet.
- Boeing 787 fleet.

The BA Cityflyer Chief Pilot is responsible for members allocated to the Embraer E190 fleet.

The Concorde Chief Pilot is responsible for members allocated to the Concorde fleet.

Each member's fleet represents their administrative team and the corresponding Chief Pilot their line manager.

Members may apply to transfer fleet 12 months after their last request was made.

Chief Pilots are empowered to accept or refuse transfer requests. Refusal of a fleet transfer for any reason other than a member not meeting the transfer time criteria must be justified, and communicated in writing to:

- The member.

- The Chief Executive Officer.

Members may appeal the refusal of fleet transfer requests to the Flight Operations Director whose decision shall be final. The outcome of the appeal must be provided in writing to:

- The member.
- The Chief Pilot.

### **3.3 Permitted Aircraft Types**

#### **3.3.1 General**

BAVirtual is primarily concerned with the operations of the real world airline British Airways. Other schedules are made available as secondary choices to provide members with additional points of interest. Permitted aircraft types are associated with these schedules.

#### **3.3.2 Substitutions**

Some aircraft may be substituted with others on mainline schedules. Permitted substitutions are controlled and listed via the BAVMS website. Substitution is not available for Historic Fleet aircraft.

#### **3.3.3 Mainline Permitted Aircraft Types**

The Mainline Permitted Aircraft Types comprise the following aircraft, when flown in a British Airways livery on a corresponding scheduled flight:

- Airbus A319.
- Airbus A320.
- Airbus A321.
- Airbus A350-1000.
- Airbus A380-800.
- Boeing 777-200ER.
- Boeing 777-300ER.
- Boeing 787-8.
- Boeing 787-9.
- Boeing 787-10.
- Dornier 328, 328Jet.
- Embraer E190.

In the event British Airways lease in capacity from other carriers, these aircraft are also permitted but are restricted to the routes allocated in the schedule database. Best endeavours will be made to keep this up to date.

#### **3.3.4 Concorde Fleet**

The Concorde fleet consists of the BAC/Aerospatiale Concorde flown in British Airways livery.

#### **3.3.5 Historic Fleet**

The Historic Fleet comprises the following aircraft, when flown in a British Airways, BOAC, or BEA livery (as applicable):

- ATR 72-300.

- BAe ATP.
- BAe 146-200.
- BAe 146-300.
- BAC 1-11.
- Boeing 707-320.
- Boeing 737-200.
- Boeing 737-300.
- Boeing 737-400.
- Boeing 747-100.
- Boeing 747-200.
- Boeing 747-300.
- Boeing 757-200.
- Boeing 767-300.
- Bristol Britannia 175.
- Britten-Norman Islander.
- de Havilland Comet 4.
- de Havilland Canada DHC-6 Twin Otter.
- Dash 8-100.
- Dash 8-300.
- Hawker Siddeley Trident.
- Hawker Siddeley HS 748.
- Lockheed L1011 TriStar.
- McDonnell Douglas DC-10.
- Vickers VC10.
- Vickers Viscount 800.

### 3.3.6 Other Aircraft Types

Other aircraft may be permitted for some BAVirtual events, including:

- Global Supply System (BA Cargo Subsidiary) B747-400F.
- Global Supply System (BA Cargo Subsidiary) B747-8F.

### 3.3.7 Aircraft Restrictions

With the exception of the BAC/Aerospatiale Concorde, all members may fly any aircraft type that is associated with the relevant scheduled flight in the BAVMS database.

The BAC/Aerospatiale Concorde is restricted to members who have met competency standards controlled by the Concorde Chief Pilot and have been accepted into the Concorde Fleet.

## 4 Management

### 4.1 Board of Directors

The Board of Directors (BoD) is the most senior management group within BAVirtual, and is collectively responsible for:

- Financing the organisation.
- Strategic leadership and delivery of a professional simulation of airline operations based on the real world airline British Airways.
- Upholding our reputation and values.

It consists of Directors, each of whom are responsible for a specific operational area:

- Chief Executive Officer (CEO), responsible for overall vision, strategy and day-to-day running of the Board of Directors and the VA in general, and the treasurer responsible for monitoring and maintaining the BAV bank account.
- Operations Director, responsible for all scheduling, route and fleet utilisation matters.
- Training Director, responsible for all fleet operational, flight training and flight technical matters and development, and the VATSIM ATO CFI post holder.
- Human Resources Director, responsible for oversight of all recruitment and membership queries.
- Technical Director, responsible for overseeing and driving current and future development of all software, web, server hardware and other technical resources.
- Merlin Developer (Director), responsible for maintaining the BAV ACARS/Merlin software.
- Marketing Director, responsible for all external communications and publicity.
- Events Director, responsible for oversight and implementation of a comprehensive programme of events and encouraging community participation.

The Chief Executive Officer may remove Directors from their roles at their sole discretion.

The Chief Executive Officer may be removed by a two-thirds majority vote of all other serving Directors.

The appointment process for new Directors must include:

- A recruitment process open to all members of BAVirtual.
- A vote by the Board of Directors, where the candidate with a simple majority of votes is deemed to be the successful candidate.

The Board of Directors must meet at least once per Quarter, and:

- An agenda must be published at least seven days before the day of the meeting.
- The minutes of the meeting, any actions raised, and the names of those who attended must be documented.

A simple majority of serving Directors must be present for a quorum to be reached.

### 4.2 Other Staff

Staff are defined as members who hold an official status that permit them to make decisions or contribute to the operations of BAVirtual, whereas Management are defined as those who

hold significant decision-making responsibility for delivering visibly and owning processes and outcomes, and have been granted Management status by the relevant departmental Director.

Staff positions may be created and filled in the event that certain criteria (the criteria) are met, namely:

- Each staff member's activity should be directly experienced by members and be visible to them.
- Staff positions should be created only when:
- New requirements are identified and cannot be fulfilled by existing staff, or
- There is too much demand on a particular function and active staff are at capacity.
- Staff positions should be created at the lowest practicable level in the organisation.

Directors are responsible for identifying and filling staff positions within their Department, and may proceed with recruitment campaigns subject to no-objection by the Chief Executive Officer who must confirm that the criteria are met.

Management position vacancies must be filled following a recruitment process open to all members of BAVirtual.

All staff roles must have accompanying objectives against which performance must be periodically reviewed. A reasonable and pragmatic approach towards this is required given the volunteer status of all roles at BAVirtual, however it is expected that persons unable to fulfil the objectives of the role vacate the position such that another member can contribute to the organisation's operations and development. The outcome of each review must be submitted by the responsible Director by the Chief Executive Officer.

## 5 Conduct

All staff are responsible for closely following the terms of this Policy, and are required to be held to a more stringent standard of conduct.

Management are expected to be critical friends to BAVirtual and provide appropriate challenge and comment on the organisation's operation via official Management communication channels.

All staff are expected to take note of and comply with Appendix B - Data Protection and Handling Policy.

**A Appendix A - Privacy Policy**

1. BAVirtual is committed to protecting your privacy and compliance with the Data Protection Act 1998 and its relevant subordinate legislation when handling any personal information. In addition, BAVirtual will ensure it complies with the General Data Protection Regulation which came into effect from 25th May 2018. Subject to the provisions of this policy we will treat any information we obtain about you arising from your use of the BAVirtual website as confidential.
2. Use by you of the BAVirtual website constitutes an acceptance of this policy which forms part of the use of the BAVirtual website.
3. This Privacy Policy only extends to this website and does not extend to your use of, provision to and collection of any data on any website to which you may link to by using the hypertext links within the BAVirtual website.
4. We collect information when you complete an application to join BAVirtual, use the BAVirtual website, when you register and log in, and when you respond to requests to submit personal information about yourself in order to collate data about our users which assists us in the future development of our website and services.
5. When you visit our website we issue a cookie or unique code that allows us to identify your computer. A cookie is used to note the different areas of the services recently accessed through your computer - this can only be done in relation to this website service and not in relation to any other sites you visit. Cookies in themselves do not identify the individual user, just the computer used.
6. We will ensure that all personal information supplied is held securely in accordance with the Data Protection Act 1998 and its relevant subordinate legislation and we will comply with the principles set out in that Act, and from the 25th May 2018 the General Data Protection Regulation (GDPR).
7. When you supply any personal information to us we will meet our legal obligations towards you in the way that we deal with that information. In accordance with the data protection principles we have to collect the information fairly and to let you know how we will use it (see paragraph C).
8. We do not supply your personal information to third parties except where required by law. We will ensure that any information will be held only as long as is necessary to ensure that our service runs smoothly. We use up to date industry procedures to keep personal data safe and secure as possible and to protect against loss, unauthorized disclosure or access.
9. We reserve the right to request a copy of a formal form of ID in order to verify your details given on your BAVirtual account should any discrepancies come to light with the details we hold for you. This should take the form of a scan of a passport or other official form of ID issued by a Government department in your country of origin.
10. We may edit this Privacy Policy from time to time. If we make any substantial change we will notify you by posting a prominent announcement on the BAVirtual forum page under the heading "Changes to the Privacy Policy".
11. As with all internet activities, BAVirtual advises all pilots to respect the first rule of internet usage and to ensure that they are using unique passwords for all internet sites requiring user login. Utilising the same password throughout your online life opens you up to security issues and potential abuse.



## **B Appendix B - Data Protection and Handling Policy**

### **B.1 Introduction**

#### **B.1.1 Purpose of this policy.**

This policy has been put in place to achieve the following aims:

- To comply with the law, particularly the EU General Data Protection Regulation
- To ensure good data protection practice.
- To protect members, staff, and other individuals.
- To protect the organisation.

#### **B.1.2 Types of data.**

BAVirtual collects a range of personal data on members at the time of joining. This data includes:

- The date of your application.
- Your full name as registered with VATSIM.
- Your date of birth and therefore your age determined from that date of birth.
- Your email address.
- Your VATSIM network ID. You must be a VATSIM member to join BAVirtual as outlined in the BAVirtual Policy.
- Your country and city of residence.
- Your IP address from the location where the application is submitted.

In addition, whilst connected to our server via Merlin, information specific to their simulated aviation operation at that time is collected. The only personal information that is visible is behind password protection and is not publicly visible. Whilst the ACARS system is visible publicly, only membership IDs are stated and no personal details can be seen related to the visible ID unless you logged in. Once logged in, member's names and ID are visible on the ACARS system, being linked to details of the flight being conducted by each member.

#### **B.1.3 Policy Statement.**

BAVirtual has an unequivocal commitment to:

- Comply with both the law and good practice.
- Respect individuals' rights including:
  - The right of access.
  - The right of rectification.
  - The right to object.
  - The right to suspend protest.
  - The right of erasure
- Be open and honest with individuals whose data is held.
- Provide training and support for staff who handle personal data, so that they can act confidently and consistently.
- Notify the relevant data protection authorities voluntarily, even if this is not required.

Key Risks Key risks are detailed in Section C.e of this Annex in the Specific Risks paragraph.

## **B.2 Responsibilities**

### **B.2.1 The Board of Directors.**

Overall responsibility for ensuring data protection and overall compliance with the relevant standards and legislation rests collectively with the BAVirtual Board of Directors.

### **B.2.2 Data Protection Officer.**

There is no appointed Data Protection Officer within BAVirtual as the organisation does not regularly process data on a large scale, due to the nature of the data that is collected and controlled, and the circumstances in which it is collected.

### **B.2.1 Specific Directors with access to personal details.**

Several members of the Board of Directors have specific responsibilities requiring access to membership details. They also oversee other staff members accessing personal data collected by BAVirtual:

CEO – The CEO, as the leader of the VA, has access to member's details which may be required when carrying out his duties in overseeing the running of the VA.

Director of Human Resources – in order to process applications to join BAVirtual and manage membership issues for existing members, he has full access to all personal details held about existing members and people who apply to join BAVirtual.

Technical Director –oversees all technical aspects of running BAVirtual including managing member's accounts and the permissions of staff members to those accounts. Other members of the Board of Directors may from time to time be tasked with specific responsibilities pertaining to the control and storage of data.

### **B.2.2 Staff & Volunteers.**

All staff members are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work within BAVirtual as detailed in this policy. BAVirtual expect the highest standard of probity of all staff at all levels. No access to data is to take place unless there is a valid network related reason for such access.

### **B.2.3 Enforcement.**

BAVirtual has a zero-tolerance policy towards inappropriate access to data stored on our secure server. Any such access will result in the individual concerned being prohibited from having further access for a minimum period of 10 years. This may result in the member being excluded from BAVirtual.

## **B.3 Security**

### **B.3.1 Scope**

BAVirtual's Security policy applies to all the servers belonging to BAVirtual, including, but not limited to Data Servers, Statistic Servers, or Web Servers.

### **B.3.2 Setting security levels.**

BAVirtual operates on a segmented security approach, where only the access required with approval by the BAVirtual Board of Directors to complete a required job function is granted. BAVirtual employs access monitoring systems to ensure that access is not being abused and can be tracked back to a specific individual.

### **B.3.3 Security measures.**

BAVirtual employs standard SSL and TLS encryption to safeguard data. BAVirtual also implements additional change-audit scripts and monitors to provide visibility into server and network activity. IP Address and Key based security settings are used to only allow server access to authorized personnel. Passwords are stored as hashed encrypted data wherever possible. As a general principle passwords are not to be stored as plain text.

### **B.3.4 Business continuity.**

In order to ensure business continuity, BAVirtual retains data backups of relevant systems to ensure a speedy recovery of impacted systems while maintaining data integrity and security. Access to these backups are granted only to authorized individuals.

### **B.3.5 Specific risks.**

The main specific risks to the security of data are:

- Phishing attacks to gain account access
- Access by means of Trojan or keylogging programmes on member's systems, and
- Access by upset staff members who have been granted access is also a risk.

Mitigation of the first two risks is by encouraging members who have a higher level of access to ensure they adhere to good security practices on their personal systems. The last risk is mitigated by access logging and reverting changes made by those who misuse access.

## **B.4 Data recording and storage.**

### **B.4.1 Accuracy**

BAVirtual data is deemed to be accurate across all systems. However due to the nature of Network Operations, some human-led mistakes may occur.

### **B.4.2 Updating.**

A BAVirtual member may request an update of his/her retained information by making a request in writing to the Director of Human Resources ([membership@BAVirtual.co.uk](mailto:membership@BAVirtual.co.uk)). The final authority to update such information shall be at the sole discretion of the Director of Human Resources.

### **B.4.3 Storage.**

Data is stored in standard relational databases. Access is via a custom-built web based interface.

### **B.4.4 Retention periods.**

BAVirtual data is retained indefinitely unless removal is requested from a BAVirtual member, as outlined in this policy.

#### **B.4.5 Archiving**

BAVirtual does not archive any data at this point in time, as data is currently retained indefinitely.

### **B.5 Transparency.**

#### **B.5.1 Commitment.**

BAVirtual is committed to ensuring all members are aware of what data is collected and why we do so. As outlined in the statement of legitimate interests, data is collected for the purpose of ensuring the provision of and smooth operation of BAVirtual as a VA so that members can jointly enjoy the simulated aviation environment it provides. Data will not be shared with third parties unless we are required to do so in law.

#### **B.5.2 Procedures.**

Details on how to exercise rights in relation to the data held is detailed in the relevant sections of this policy.

#### **B.5.3 Responsibility.**

All staff within BAVirtual are responsible for member's data at all times. The various departments most closely associated with members data are the BAVirtual Directors as highlighted in section B.c, and their associated staff. Where staff require to use data for statistical and management purposes aggregated pseudonymised data should be used where possible.

### **B.6 Right of Access**

#### **B.6.1 Responsibility.**

Requests for personal data under the Right of Access are the responsibility of the Human Resources Team. Such requests are required to be complied with within one month of the request being received. If circumstances prevent this from occurring, an extension of a further two months may be instituted by BAVirtual, providing that the member making the request is informed of this fact before the expiration of the original one month deadline.

#### **B.6.2 Procedure for making request.**

Right of access requests must be in writing (this includes via electronic mail to [membership@bavirtual.co.uk](mailto:membership@bavirtual.co.uk)). If a staff member at a lower level receives anything that might reasonably be construed to be a request for access they have a responsibility to pass this to the Director of Human Resources without delay.

#### **B.6.3 Provision for verifying identity.**

Where the person managing the access procedure does not know the individual personally there should be provision for checking their identity before handing over any information.

#### **B.6.4 Charging.**

BAVirtual will not, and cannot charge any fee for providing data for requests under the Right of Access.

### **B.6.5 Procedure for granting access.**

The Director of Human Resources is responsible for handling requests under the Right of Access provisions. Requests will be made via email to the Human Resources Department ([membership@bavirtual.co.uk](mailto:membership@bavirtual.co.uk)), who will then proofread the data and send it to the member making the request. Because of the potentially sensitive nature of comments on a members record, as well as ensuring there is no retaliation or harassment against BAVirtual Staff, and to protect the privacy of staff members, names of those staff who have made entries on a members record, along with any security measures adopted by BAVirtual, are redacted before sending it to the member.

## **B.7 Right of Rectification**

### **B.7.1 Responsibility.**

Accurate data is in the best interests of both BAVirtual and the membership. BAVirtual members are responsible for the management of such requests.

### **B.7.2 Procedure for making requests.**

Right of rectification requests should in the first instance be made via email to [membership@bavirtual.co.uk](mailto:membership@bavirtual.co.uk) by the member making the request. If staff at a lower level receive anything that might reasonably be construed to be a request for rectification they have a responsibility to direct the member to send an email to the Human Resources Department.

### **B.7.3 Disputes.**

Where there is a dispute between a member and BAVirtual over the accuracy of data, the member shall be empowered to make any final decision on whether to alter data or not. This decision should be communicated to the member making the request within one calendar month of the request having been made.

### **B.7.4 Charging.**

BAVirtual will not, and cannot charge any fee for requests under the Right of Rectification.

## **B.8 Lawful Basis**

### **B.8.1 Underlying principles.**

BAVirtual asserts that it has a legitimate interest in collecting and storing the personal data outlined above.

The reasons for this claim are:

- BAVirtual is a voluntary community promoting flight, and all members seeking to join have an obvious interest in such activities.
- The data collected is the minimum required to allow for the smooth and optimal running of the VA, solely for the enjoyment of its members.

- That the data is necessary to allow for BAVirtual staff to properly manage the VA, both in day to day operations, and in circumstances where a member(s) may act in a manner contrary to the BAVirtual Policy.
- That is because all members have a shared interest in these aims that the collection of such data should be reasonably expected by all members.

### **B.8.2 Members under 16 years.**

BAVirtual does not accept membership from any individual under 16 years of age. Members found to have falsified their age will have their account closed immediately. This may result in an inability to re-join BAVirtual in the future, even if the applicant has reached the age of 16 years.

### **B.8.3 Opting out.**

Notwithstanding BAVirtual's claim of legitimate interest, members may at their discretion object to this claim and/or request that BAVirtual cease processing of a member's personal data. These two rights are known as the Right to Object, and the Right to Restrict Processing. Members must be aware that if they choose to exercise either of these rights BAVirtual is obliged to close their accounts in order to comply with their wishes and they will no longer be a member of BAVirtual.

### **B.8.4 Timing of opting out.**

While a notification of an objection to BAVirtual's claim of legitimate interest, or a request to suspend processing may be made at any time, such claims may not be made retrospectively.

## **B.9 Right of Erasure.**

### **B.9.1 Responsibility.**

Requests for deletion of personal data under the Right of Erasure are the responsibility of BAVirtual members. Such requests are required to be complied with within one calendar month of the request being received. If circumstances prevent this from occurring, an extension of a further two months may be instituted by BAVirtual, providing that the member making the request is informed of this fact before the expiration of the original one-month deadline.

### **B.9.2 Procedure for making requests.**

Right of erasure requests should be in writing (this includes via electronic mail to membership@bavirtual.co.uk). On receipt of a verbal request for erasure (in Discord, for example), staff concerned should immediately ask the member making the request to confirm the request in writing. If staff at a lower level receive anything that might reasonably be construed to be a request for erasure they have a responsibility to pass this to the Director of Human Resources without delay.

### **B.9.3 Provision for verifying identity.**

Where the person managing the erasure procedure does not know the individual personally there should be provision for checking their identity before deleting any information.

### **B.9.4 Charging.**

BAVirtual will not, and cannot charge any fee for deleting data under the Right of Erasure.

#### **B.9.5 Procedure for granting erasure.**

BAVirtual shall evaluate all requests for erasure. BAVirtual reserves the right to retain any data that it believes is in its legitimate interest to do so, or that is required to establish, exercise, or defend any legal claims.

### **B.10 Staff training & Acceptance of Responsibilities.**

#### **B.10.1 Induction.**

All staff who have access to any kind of personal data should have their responsibilities outlined during their induction procedures.

#### **B.10.2 Continuing training.**

If there are opportunities to raise Data Protection issues during staff training, team meetings, supervisions, etc. these shall be undertaken.

#### **B.10.3 Procedure for staff signifying acceptance of policy.**

All staff given access to member's details shall receive training on data access procedures via the documents outlined above. All such members are required to acknowledge that they have received this training, that they understand the requirements of them, and their acknowledgement to be bound by them. Electronic mail is an acceptable (and the preferred) method for this acknowledgement. This acknowledgement will be recorded on the member's records.

### **B.11 Policy review.**

#### **B.11.1 Responsibility.**

The responsibility for review of this policy rests with the Board of Directors.

#### **B.11.2 Procedure.**

At a minimum this review shall require:

- Consultation with the full Board of Directors.
- Specific consultation with all Directors with responsibilities under this policy.
- Analysis of all audits of data access during the period of validity of the current policy.
- Analysis of any data breaches during the period of validity of the current policy.
- A new Data Protection Impact Assessment.
- A new Legitimate Interest Assessment.

#### **B.11.3 Timing.**

In order for the required review to be completed by the required date (28 February 2023) such consultation shall commence no later than 28 August 2022.