

HENLEAZE BOWLING CLUB

CLUB POLICY ON GENERAL DATA PROTECTION REGULATIONS (GDPR)

Introduction – This policy concerns the personal data (data) held by the Club, its security and its use.

The policy gives effect to **GDPR**, which came into force on 25 May 2018. It defines the people involved, the personal data (data) collected by the Club, how it is stored and used internally and externally, and a Member's rights over his or her data.

The Club uses this data solely for the purposes of the effective running of the Club. It also shares the data with the Gloucestershire Bowls Association (GBA) and with Bowls England (BE) for their purposes in administering the sport of bowls and with the City and County of Bristol Bowling Association (C & C) and the Bristol and District Bowls League (BDL) for the facilitation of its relationship with these organisations.

The **Data Controller** for the purposes of GDPR will be the **Club** through the General Committee (GC). GC will be responsible for the implementation and review of this policy. Given the nature of data held and size of the Club, the appointment of a **Data Protection Officer** is not seen as required; any concerns relating to data protection should be addressed to the **President** who will fulfil this role.

The **Data Processor** will be the **Honorary Secretary** (Hon Sec) who will hold the membership database on a Desktop computer. Hon Sec will be responsible for the collection of the data, its security, ensuring that permission for the data to be held, used, and shared as described below is given, and the updating of club records, including deletion where required.

What Data is Collected and Why

The Club collects contact and membership details to enable it properly to manage and administer your membership with us, the GBA and BE. These details include contact details, date of birth, gender, and details of a contact in case of emergency, if provided. This information is lawfully required and collected as a standard part of your application to join or re-join our Club.

GBA and BE also need to collect ethnicity and disability information for the purposes of equal opportunities monitoring to help promote an environment that is inclusive, fair, and accessible. The Club does not collect or hold any 'sensitive data', such as health issues, for any Member.

The Club will communicate with Members in the most appropriate way, based on the data provided by the Member. The Contact list available within the Clubhouse will contain only names and telephone contact details. A full Membership list will be made available to Members individually. The Fixture List will include the names, addresses and telephone contact details of Officers and other Post Holders as appropriate. For the purposes of arranging matches, competitions and functions, the names of those responsible, together with contact details, may be posted on the Notice Boards; this data will be kept to the minimum commensurate with the effective operation of the Club.

When is the Data Collected and Reviewed

This data is captured when a Member first joins the Club through a Membership Application form and during the joining process. The accuracy of the data will be reviewed annually when a Member renews his or her membership.

Security of the Data

To ensure the security of the data, the Club requires that access to the computer record is password protected and that any file holding the information is also individually password protected. The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

Sharing Data outside the Club and the National Members Register

Data is shared with GBA and with the national governing body, BE, so that they too can properly manage and administer affiliated membership with them. The data is shared via a *National Membership Register*, the content of which is controlled at all levels by limited and authorised access.

Neither the Club, nor GBA, nor Bowls England permits the sharing of personal data held on the Membership Register to any third party whatsoever. Specifically, personal data will not be released to any other organisation for marketing or communication purposes.

Where direct consent is given by a member having an identified responsibility or role within their organisation, specific and limited information may be published by the Club, GBA, BE or C & C in annual handbooks or on their websites and other social media for the purposes of effective appropriate communication within the sport. The

holders of posts within one or more of these organisations will be required to formally consent to the use of specified personal information in this way, and such consent will be recorded by the relevant organisation. The Club will require that these organisations do not further share the data or use it for any purpose except communications and publications as specified above. The Club will not release the data to any other organisations for marketing or other purposes. The data is not used in any form of automated decision making or profiling.

Member's Rights to their Personal Data

All Members have the right to be provided with a copy of their data held by the Club. Any request for this should be made in writing to Hon Sec. The Club has one month to reply to any such request. All Members further have the right see their *National Members Register entry*, either on line through the facility provided within the register or by post. There will be no charge for such access to data. The data held on a Member will be deleted within one month of notice that the member has left or is not re-joining the Club.

Young People's Data

GDPR will set an age for a young person to give their own consent to the collection and storage of their personal data. However, given the BE requirements concerning young people, if any club member is below 18, permission for the collection and use of their data will be sought from the parents/guardians of the young person. Only the name of a young person will be given in Club documents. Any Member requiring contact with a young person should approach Hon Sec to seek agreement for the release of contact details.

Breaches of Data Security

If at any point a breach of data security is suspected or identified, then that suspicion or fact must be reported immediately (verbally if necessary and confirmed in writing) to Hon Sec who is responsible for investigating breaches of security, determining the resultant degree of risk and deciding on the action to be taken, reporting this at the first opportunity to the General Committee.

Where a breach is likely to result in a serious risk to the rights and freedoms of a Member (say involving health or financial issues), Hon Sec has 72 hours to report the incident to the Information Commissioners Office (ICO). The Club recognises that the requirements of the GDPR apply as much to paper files and records as it does to digital ones and will ensure that any paper records are similarly securely treated. As security issues are much more problematic for paper records, the Club will seek to reduce the use of paper files to the minimum possible.

Consent on the Holding and Use of the Data

On applying to join the Club, a Member will be given a copy of this policy and asked to confirm that they have read and accept it and that the Club may use the data in pursuance of managing the relationship with the Member. In addition, they will be asked to consent to the publication of their data where appropriate.

Reviewing Consent

At least every four years, Members will be asked to reconfirm their consents as described above.

T M LOGAN
Hon Sec

June 2020