

## Cheltenham Spa Bowling Club

### Club Policy on General Data Protection Regulations (GDPR)

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

The policy is written in response to the **GDPR**, in force from 25 May 2018. It defines the people involved, the data collected by the Club, how it is stored and used internally and externally, and members' rights over their data. The Club uses this data solely for the purposes of the effective running of the Club. It does not share the data with anyone except Gloucestershire Bowls Association (GBA) and Bowls England (BE) for some specific post holders.

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

The **Data Processor** will be the **Club Secretary** who will hold the club membership database on their computer. The Secretary 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 updating of club records including deletion where required.

#### **What Data is Collected and Why**

It is necessary for the personal information to be collected for the effective running of the Club as tabulated below:

Data Collected	Reason for Collection
<b>Name</b>	This is necessary for legal, insurance and licensing purposes. In addition, the Club is entitled to be aware of who is permitted to be on its premises
<b>Address</b>	Required so that club information can be sent to members, not all of whom have an e-mail address. In addition, it facilitates shared transport arrangements
<b>Phone Number</b>	Home and mobile numbers are for competitions, contact purposes and members directory.
<b>E-mail address</b>	The prime means of communication with members over competitions, teams, events, general matters and for the members directory
<b>Date of Birth</b>	Club fees are age dependent. Date of birth is therefore required to establish the correct fees. In addition, some competitions have a specified age range for entrance
<b>Gender</b>	Some competitions are gender specific
<b>Date of Joining</b>	To enable long-serving members to be identified and recognised

The Club does not collect or hold any 'sensitive data' for a member such as health issues.

#### **When is the Data Collected and Reviewed**

This data is captured when a member first joins the Club through a Club Membership Application form. The accuracy of the personal information will be reviewed annually when a member renews their membership.

#### **Who Collects and Holds the Data**

The data is collected by the Club Secretary. To ensure the security of the data held, the Club requires that access to their computer is password protected and that any file holding the information is also individually password protected.

#### **What Data is Shared outside the Club**

**GBA** – The GBA publishes annual handbooks which contain information which may include:

- **Club Secretary** – name, address, phone number(s) and e-mail address;
- Women's Divisional Delegate** – name, address, phone number(s) and e-mail address
- Match Secretary** – name, address, phone number(s) and e-mail address;
- County Two-Rinks Captain(s)** – (Men's Division) name and phone number; and,
- County Inter-Club Competition Organiser** – (Women's Division) name and phone number(s).

The holders of these posts will be required to confirm that they agree to the sharing and publication of this data.

**Bowls England** – BE also publish an annual handbook which contains contact information for the Club, namely

- **Bowling Secretary** – name, phone number and e-mail address.

As above, the individual post holder will be required to confirm their agreement to this.

The Club will require that both 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.

#### **Gloucestershire County Bowls Sunday League**

League contacts will give consent directly to the League Secretary on an annual basis.

Members are also asked to provide some personal information on entry to County Competitions. This area is not a club matter and is therefore dealt with separately by the GBA Policy, a copy of which can be obtained from the appropriate Divisional Secretary.

No data is shared by the Secretary within the Club except e-mail addresses with captains and match organisers so that they may arrange teams for games and contact members over a match should the need arise and with the social secretary and bar member to allow them to fulfil their duties.

The Club will not publish any personal data on the club website (except an email contact with their permission if this is a personal one) unless this is in a separate members-only area which is password protected.

#### ***Member's Rights to their Personal Data***

All members have the right to be provided with a copy of the data held on them by the Club. Any request for this should be made in writing (including e-mail) to the Club Secretary. The Club has one month to reply to any such request. 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 the Members Directory.** Any member requiring contact with a young person should approach the Secretary 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 the Club Chairman 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 Management Committee.

Where a breach is likely to result in a serious risk to the rights and freedoms of individuals (say involving health or financial issues), the Club Chairman 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. Specifically, membership lists containing personal data will not be displayed on notice boards or the website for public viewing.

#### ***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 contact them through mail, e-mail and/or phone as outlined. Such communications will be restricted to matters such as: GBA and BE issues; club meetings, minutes and events; availability for and selection of teams; and other such club related material. In addition, they will be asked to consent to the publication of their name, address and phone number(s) in the Members Directory for communications and so that they and other members can arrange matches as part of Club Competitions.

The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

#### ***Reviews***

It is expected that a member will update their personal information if it changes during the year. At the annual meeting, members will be asked to confirm the accuracy of the data held on them. At least every four years, members will be asked to reconfirm their consents as described above.