



Bishops Cleeve Bowling Club

**CLUB POLICY
ON GENERAL
DATA PROTECTION
REGULATIONS
(GDPR)**

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To comment or feedback on this document please contact the Club Secretary.

Section 1 Introduction

This policy covers the use and security of the personal information (**data**) held by Bishops Cleeve Bowling Club (**Club**).

The policy is written in response to the General Data Protection Regulation (**GDPR**) which comes into force on 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 six privacy principles of the GDPR which the Club must comply with are:

1. Personal data must be processed lawfully, fairly and in a transparent manner;
2. Personal data must only be collected for "specified, explicit and legitimate purposes";
3. Data collected must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Personal data must be accurate and where necessary kept up to date;
5. Personal data that is no longer required should be deleted;
6. Processors should ensure all personal data they hold is secure.

The Club uses this data solely for the purposes of the effective running of the Club. It does not share the data with anyone outside the Club except Gloucestershire Bowls Association (GBA) and Bowls England (BE) for their purposes in administering our sport.

Where the words "Electronic Device" are used within this document this means any device capable of creating, transmitting or receiving text or data e.g. Personal Computer, Laptop, iPad, Mobile Phone etc.

Section 2 Responsibilities

2.1 Data Controller

The Data Controller for the purposes of GDPR will be the Club through the Management Committee. They will be responsible for the implementation and annual 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.

2.2 Data Processor

The Data Processor will be the Club Secretary who will hold the Club Membership details. 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.

Section 3 What Data is Collected and Why

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

Data Collected	Reason for Collection
Name	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
Address	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
Phone Number	Home and mobile numbers are for competitions and contact purposes
E-mail address	The prime means of communication with Members over competitions, teams, events, general matters
Date of Birth	Date of birth is required in some competitions and some team selections which have a specified age range
Gender	Some competitions are gender specific and there are gender specific sections within the Club
Club Membership Status	Type of Club Membership (Full, Social with Green Licence, Social)
Date of Joining Club	To enable long-serving Members to be identified and to be used for handicapping in Club Competitions.
Member of any other Bowling Club	For the Club to be aware of other Bowling Clubs with which a Member is associated in order that there is no breach of rule 5.1 of the Rules and Regulations "No full Member may play for another club against a team from Bishops Cleeve Bowling Club
Emergency Contact	Name & Contact details of a person who needs to be contacted on behalf of a Member in the event of an Emergency

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

3.1 When is the Data Collected and Reviewed

This data is captured when an individual first joins the Club through a Club Membership Application form.

If a Member's personal information changes during the year it is their responsibility to advise the Club Secretary.

At the annual subscription, Members will be asked to confirm the accuracy of the data held on them and will be asked to reconfirm their consents as described above.

3.2 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 any electronic device holding the data is password protected and that any file holding the information is also individually password protected.

3.3 What Data is shared outside the Club

3.3.1 Gloucestershire Bowls Association (GBA)

The GBA publishes annual handbooks which contain contact 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.

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.

3.3.2 Bowls England (BE)

BE also publish an annual handbook which contains contact information for the Club, namely

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

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

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 the GBA, nor BE permits the sharing of personal data held on the National 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 or BE 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 both organisations do not further share the data or use it for any purpose except communications and publications as specified above. A consent form from both organisations will be signed on behalf of the Club by the Club Secretary. The Club will not release the data to any other organisations for marketing or other purposes. The data will not be used in any form of automated decision making or profiling.

Section 4 Consent on the Holding and Use of Personal 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, information and events;
- Availability for and selection of teams;
- Club support activities;

Section 5 Members 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 and where the data is held. Any request for this must 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.

5.1 Right to rectification

An individual has the right to ask for any wrong or incomplete information the Club holds about them to be rectified. Any third parties who have had access to the personal data in question must also be informed about any changes. Any request for rectification must be answered within one month

5.2 Right to delete

Also known as the 'right to be forgotten'. This allows an individual to request the deletion or removal of personal data that is held about them. However, this right can only be applied by an individual for a specific set of reasons, including:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally intended
- When the individual withdraws their consent
- When the individual objects to the Club processing their data and there is no overriding legitimate interest to continue the processing;
- If the Club is in breach of the GDPR;
- The personal data must be erased in order to comply with a legal obligation;
- The personal data is processed in relation to the offer of online services to a child (which requires parental permission).

The Club can refuse a request from a Member to delete their data for the following reasons:

- To comply with a legal obligation
- The exercise or defence of legal claims.

If the erased personal data has been shared with third parties, the data holder must inform those third parties that the data needs to be erased.

5.3 Young People's Data

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. Any Member requiring any contact with a young person must do this through parents/guardians of the young person.

5.4 National Membership Register

Each individual member has the right and the facility to directly access and manage their personal data held on the National Membership Register. No one else other than the Club Data Processor has the facility to add or modify personal data. 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.

Section 6 Sharing of Members Personal Data within the Club

All Club Membership data is shared by the Club Secretary with the Chairman & Treasurer of the Club. This is carried out to provide a backup of the data and to allow Members to be contacted in the event that the Club Secretary is unavailable, for whatever reason.

E-mail addresses, telephone numbers and Club Membership status, will be shared with the Match Secretary, Competition Secretary, Men's & Ladies Section Captains and Secretaries so that Members can be contacted relating to team selection and any changes to a match should the need arise.

Members of the Club will be asked to consent to the publication of their name and contact telephone number(s) being produced on a paper list. A copy of this list will then be provided to all consenting Members, each year, to allow them to arrange matches as part of internal Club Competitions, to allow them to contact other Members for lifts to club matches, replacement players for teams, changes to Club Rotas etc.

Members who indicate at renewal, or when joining the Club, that they are willing to support Club activities e.g. Bar Duty, will have their e-mail addresses and telephone numbers given to the person who is responsible for the activity.

All files containing personal data must only be held on a password protected electronic device. The individual file(s) containing personal data must also be password protected.

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

The Club will not publish any personal data on the Club website or advertise it within the Club.

Section 7 Deletion of Personal Data

Any personal data held, either electronically or on paper must be deleted securely.

If personal data is held in paper format this must be destroyed, shredded or burnt, when no longer required.

If a member of the Management Committee, has had access to personal data, that individual must delete the, electronic and/or paper, data, when an updated version of data is provided after the annual renewal process. This must be confirmed to the Club Secretary in writing and retained by the Club Secretary for a minimum of seven years.

Where an individual is no longer a member of the Management Committee they must confirm that any personal, electronic and/or paper, data which they have had access to have been securely deleted. This must be confirmed to the Club Secretary in writing and retained by the Club Secretary for a minimum of seven years.

All Members will be asked to destroy, shred or burn, the previous year's paper list of Full Members contact details, when they are provided with a new list after the completion of the annual renewal process.

The data held on the National Membership Register relating to a member will be deleted within one month of notice that the member has left or is not re-joining the Club.

Section 8 Breaches of Personal 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 Data Controller, 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, Club Membership lists containing personal data will not be displayed on notice boards or the website for public viewing.

Document Control and Record of Amendments

Version	Reason for amendment	Sections amended	Amended by	Reviewed by/date
1.0	New document to comply with GDPR	All		May 2018
1.1	Amendment to Section	TOC	Terry Poulson	November 2018
1.2	Amendment to cater for the introduction of the National Membership Register	TOC, 1,3,5,7		June 2020