DURSLEY BOWLS 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 also shares the data with the Gloucestershire Bowls Association (GBA) and Bowls England (BE) for their purposes in administering our sport.

The **Data Controller** for the purposes of the GDPR will be the **Club** through the Management 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 Processors** will be the **Club Secretary** aided by the **Membership Officer** who will hold the club membership database on their computer. The Data Processors 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

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

We also need to collect ethnicity and disability information for the purposes of equal opportunities monitoring because we must promote an environment that is inclusive, fair, and accessible. For this information alone, we need your consent to collect it.

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 and / or Membership Officer. 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.

Sharing Personal Date outside the Club

Data is shared with the Gloucestershire Bowling Association and with the national governing body, Bowls England, so that they too can properly manage and administer your affiliated membership with them. In the County the data is shared via the GBA Software Management System, the content of which is controlled at all levels by limited and authorised access.

Neither the Club, nor the GBA, nor Bowls England permits the sharing of personal data held in the GBA Software Management System 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.

Member's Rights to their Personal Data

Each individual member has the right and the facility to directly access and manage their personal data held on the Club's Membership Database. They may also register as an individual user of the GBA Software Management System but may only see and modify their own details (other than seeing contact information for the purposes of arranging County Competitions).
No one else other than the Club Data Processors have the facility to add or modify personal data in either database. 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 and should routinely be deleted by the Club Data Processor if held within the GBA Software Management System.
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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 club handbook.** Any member requiring contact with a young person should approach the Club 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 use the personal data in the proper pursuance of managing their relationship with the member.

In addition, members will be asked to consent to the publication of their name and contact details in the Club Contact Details sheet for club communications and so that they and other members can arrange matches as part of Club Competitions.

Reviews

It is expected that either a registered individual member or the Club Data Processors will update individuals' personal information if it changes during the year. At the annual subscription, 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.

I have read, understand, and accept the Club's GDPR policy, and I consent to the collection of my ethnicity and disability data and to the use of my contact details in the Club Contact Sheet. You will be asked to sign to this affect when you complete your membership joining / renewal application form.

Please retain a copy for your own records