



Crofton Bowling Club

General Data Protection Regulations (GDPR) Policy

Introduction

This document is the policy statement of Crofton Bowling Club in respect of its statutory obligations under the General Data Protection Regulation (GDPR) introduced as the UK Data Protection Act 2018.

The policy is owned by the Executive Committee of the Club.

In the event of any conflict between the Constitution of the Bowling Club and this GDPR policy, the Constitution of the Club will prevail, other than if any such outcome would jeopardise the Club's lawful obligations or position under the General Data Protection Regulations. In such a situation, a change to this GDPR Policy Statement, or to the Club Constitution, as appropriate, would also be required.

The policy statement covers four main areas:

1. What data does the Club collect about its Members?
2. What does the Club use that data for?
3. How is the data stored, processed, and managed?
4. How does the Club meet its obligations toward each Member's rights under GDPR

It's useful to note that GDPR regulations, particularly around data storage, are not confined to electronic data – data stored on paper (hard-copy) may also be included:

GDPR applies to the processing of personal data that is:

- wholly or partly by automated means; or
- the processing other than by automated means of personal data which forms part of, or is intended to form part of, a 'filing system'¹.

This document is the 'parent' document, from which the '[Data Privacy Notice to Members](#)' is derived. That formal notice is the club's statement to its Members, explaining the data protection policy as it affects each Member's personal data.

In the context of this document, the phrase 'Club Members' is deemed to include all Member types, whether regular, temporary or 'Friends of Crofton'.

¹ No GDPR-specific definition of a 'filing system' has yet been identified

Overview

The Club is committed to ensuring compliance with the principles and provisions of the General Data Protection Regulations', below:

- Meet the Club's legal obligations under the General Data Protection Regulations.
- Ensure that data is collected and used fairly and lawfully.
- Process personal data only in order to meet its operational needs
- Take steps to ensure that personal data is current and accurate.
- Establish appropriate retention periods for personal data.
- Provide Members with access to their personal information upon request.
- Adhere to Article 17 granting a Member the right to have their personal information erased.
- Provide adequate security measures to protect personal data.
- Ensure its relevant officers' computer security software is current.
- Ensure its relevant officers' computers containing personal information have that information password-protected and that the password is changed on a regular basis.
- Ensure that a nominated Committee Member is responsible for advising the Committee on its responsibilities for data protection compliance and provides a point of contact for all data protection issues.
- Ensure that all Members are made aware of good practice in data protection.
- Provide adequate training for all Members responsible for personal data.
- Ensure that queries about data protection, internal and external to the Club, are dealt with effectively and promptly.
- Regularly review data protection procedures and guidelines within the Club
- Ensure that everyone handling personal data knows how/where to find further guidance.

GDPR Management System

General

A 'Data Controller' is the person (or entity) that defines and controls how the data is used and processed. A 'Data Processor' is a person (or entity) who processes the personal data in accordance with the instructions of the Data Controller.

Formal definitions are:

- A Data Controller is defined as 'a natural or legal person, public authority, agency or *other body*, which, alone or jointly with others, determines the purposes and means of the processing of personal data'
- A Data Processor is defined as 'a natural or legal *person*, public authority, agency or *other body* which processes personal data on behalf of the Data Controller'.

A Data Controller is typically appointed or designated, whereas a Data Processor typically has such a role by virtue of their position/role/responsibilities. There may be several Data Processors but only one Data Controller.

The Club's Operational Management System

The 'Data Controller' is the Executive Committee of the Club, responsible for the Club's Data Protection policy and practices. It owns this Policy Statement, the [Data Privacy Notice to Members](#) and directs Data Processors.

Essentially, a sports organisation such as the Club will always be the data controller of the personal data relating to its Members (and its representatives and its staff / employees / volunteers).

- Occasionally however, if, for example, it is giving presentations for, or arranging workshops or training sessions on behalf of, other organisations, the Club (or its representatives) might only be a data processor of the personal data of the attendees/participants on behalf of that other organisation, who would, in that case, act as the Data Controller.
- An example of this could be where the District Association or County Bowls organisation holds contact information provided via the Club, with its Member's approval and acceptance, about selected Club Officials or all affiliated Club Members, or about Club Members who attend a course, or enter a competition, run by such organisation.

In practice, there is a primary contact and lead adviser to the Executive Committee in its role of Data Controller, and on all GDPR matters; this adviser is appointed by the Executive Committee, and will typically also be a Member of that Executive Committee, in addition to having subject matter expertise.

There are several 'Data Processors' of the Club's data.

The primary 'Data Processors' are:

- Club Assistant Secretary, responsible for Club Membership, including Membership applications, maintaining a register of Members (whether regular, temporary or 'Friend').
- Club Lead Coach(es), responsible for recording names and contact details of temporary Members or non-Members attending introduction and/or coaching sessions
- Club Secretary, responsible for preparation and publication of direct communications to Members (soft-copy via e-mail/website and hard-copy mailing), meeting minutes, annual signing-on documentation, posting of many different types of document on club notice-boards
- Club Webmaster, responsible for preparing and posting documentation on the website

Other 'Data Processors' include, but are not limited to:

- Club Treasurer, receiving and processing payment information
- Club Team Captains, holding membership contact lists, recording availability, team selections and records of members who may have played a series of matches
- Club Competitions Secretary, recording participation and progress of Members in club competitions
- Club Coaches, when recording information on new bowlers attending 'come-and-try' days or similar, and/or bowlers attending introductory coaching sessions and becoming temporary Members, or if maintaining a record of grades, assessments, achievements of Club Members
- Any Executive Committee Member currently holding Membership list details
- All former Executive Committee Members, who may still retain such data listed above
- Organisations providing data storage or back-up services to any of the Data Processors.

- Our Banking services provider partner (Lloyds Bank), whose facilities we use to store and process members' bank account data for payment types such as cheques and EFT.
- Our Website-provider partner (the HugoFox organisation), whose facilities we use to store and process data under the direction of the Club Webmaster, including
 - the messages and forms facilities, enabling a web-site user to contact the Club,
 - a range of Club documentation and images.
- For those who access, or may additionally subscribe to the 'e-mail alert' notifications service from, our website, such use and GDPR compliance is governed by a specific '[Website Privacy and Use](#)' Policy, accessible from each website page. No individual-level user information or subscriber information/e-mail address collected by HugoFox is held by, or is available to, the Club, other than personal information from messages specifically submitted by a website-user to be transmitted to the Club (via such pages as '[Contact Crofton Bowling Club](#)', or similar methods) which then becomes known to the Club, on receipt, in the same way as information in any regular e-mail.

What data does the Club collect, store and process?

The Club typically collects, for storing and processing, Members' following personal information:

- Name
- Address
- Phone number(s)
- E-Mail address
- Date of Birth / Age
- Occupation
- Previous Bowling Official/Playing roles
- Bank Account information
 - on member-submitted cheques to be deposited or when making EFT² payments
- Images of Members, from Club bowling events
- For junior players or vulnerable adults, additional information required under Safeguarding Legislation and practices, and supplied by parent/guardian or responsible adult.

How does the Club collect such data from Members?

We typically collect such data from each Member's original membership application form, as provided by the Member.

We collect modifications of such data but usually direct from the Member.

A Member's bank account information comes on a cheque submitted by the Member, or is provided by the Member to receive an EFT² payment.

Any images (photographic and/or videographic) of a Member are typically taken at a Club event, and made available to the Club by one of its Members.

² EFT: Electronic Funds Transfer (also known as 'Bank Transfer' or 'BACS')

How does the Club store and process such data?

This is a list of stored personal data and its media, identified to date; others may exist:

1. Membership Application Forms
 - name, address, contact³, occupation, age/date of birth⁴, previous bowling (and/or club official) experience
2. 'Friend' Application/Conversion Forms
 - name, address, contact³, age/date of birth⁴
3. Annual Signing-on documents for each Member
 - League Team Preference form
 - Contact information changes
 - Payment Transactions (Subscription & Competitions page)
4. Membership lists
 - name, address, contact³
 - soft-copy/hard-copy managed, and used, by Asst Sec
 - soft-copy/hard-copy held, and used, by Secretary
 - soft-copy/hard-copy (excludes address) held by Team Captains
 - soft-copy held by Webmaster
 - soft-copy (excludes address) stored on Website
 - hard-copy (excludes address) available in Clubhouse Documents case
5. Membership subscription consolidation lists
 - name, subscription type, amount, date
6. Members' cheques submitted to the Club for depositing
 - bank account information
 - hard-copy, held mainly by Treasurer for the duration of each deposit process
7. EFT payment request/consent
 - bank account information
 - soft-copy (typically), held by Treasurer for the duration of each payment process
8. Expense Reimbursement claim
 - name, reimbursement bank account payee name
 - soft-copy/hard-copy held by Treasurer
9. Exec Committee Minutes
 - individual names/attributes
 - soft-copy managed by Secretary
 - soft-copy held by Executive Committee Members
 - soft-copy held by Webmaster
 - soft-copy stored on Website
 - hard-copy held by Executive Committee Members
 - hard-copy – available in Clubhouse Minutes book
10. Ladies' Section Meeting Minutes
 - individual names/attributes
 - soft-copy managed by Ladies' Secretary

³ Phone number(s) and e-mail address

⁴ If under 18

- soft-copy held by Webmaster
 - soft-copy stored on website
 - soft-copy held by most Lady Members
 - hard-copy held by selected Lady Members
 - hard-copy available in Clubhouse Minutes book
11. Minutes of 'all-Member' meetings⁵
- individual names/attributes
 - soft-copy managed by Secretary
 - soft-copy held by Webmaster ○
- soft-copy stored on website
- soft-copy held by most Members
 - hard-copy held by selected Members
 - hard-copy available in Clubhouse Minutes book
12. Names and Contact Information of (selected) Club Officials
- soft-copy Website
 - hard-copy Club Fixtures booklet
13. Competition Draw/Progress/History
- soft-copy Competition Secretary
 - soft-copy Webmaster
 - soft-copy Website
 - hard-copy Clubhouse notice board
14. Team Squad lists, including availability
- soft-copy originator (Club Captain)
 - soft-copy held by Team Captains
 - soft-copy held by Webmaster ○
- soft-copy stored on website ○ hard-copy
Club notice board
15. Tea / Catering / Cleaning rotas
- soft-copy originator (Ladies' Sec / Asst Sec)
 - soft-copy held by Webmaster ○ soft-copy
stored on website ○ hard-copy Club notice
board
16. Images (photographic/videographic) of Members
- soft-copy held by Originator / First Recipient Club Official
 - soft-copy held by Webmaster
 - soft-copy stored on website
 - hard-copy stored in Clubhouse
17. Archive storage of previous years' documentation
- soft-copy held by Originator ○
- soft-copy held by Webmaster ○ soft-
copy stored on website
- hard-copy stored in Clubhouse
 - hard-copy stored at residence of relevant Club Official(s)
- ~~18. Back-up and/or remote storage of files~~

⁵ Includes Annual General Meetings, Pre-Season Meetings, etc

- soft-copy stored under the account of relevant Club Official(s)

Why does the Club collect, store and process such data?

The Club's purpose in collecting such data is, as the Member might reasonably expect, to perform effective administration of the club on behalf of the Members (jointly and severally)

- managing Membership applications and registration
- maintaining a Membership register, including subscription payment records, to manage Club Membership and the Club's activities
- communicating Club information to the Members
- providing selected contact information of Members to enable contacts between Members, typically for the purpose of arranging matches

This is known, under GDPR, as 'legitimate interest' and is the legal basis on which the Club mostly collects, stores and processes Members' personal information.

For personal bank account information provided to the Club by the Member, typically via a cheque submitted to the Club for depositing or to enable an EFT payment from the Club to the Member, the legal basis under GDPR on which the Club collects and processes such information from Members (temporarily, until the deposit or payment process is complete) is that of 'consent'.

- Consent is taken as implicit in the submission of a cheque to the Club by a Member, but will be specifically requested of the Member for each outbound EFT payment.

For photographic/videographic images held by the Club and which may individually identify a Member, and which may be posted on the Club's website or clubhouse noticeboard, for promotional or celebration purposes, the Club will not display, nor continue to hold such an image, without the subject member's specific approval. The legal basis under GDPR on which the Club collects, stores and processes such images of Members is that of 'consent'.

How does the Club protect such data?

This section describes how the Club will 'protect' such data.

- The Club will not sell personal data
- The Club will not pass on personal data to non-Members or external organisations, other than to the Club's service-provider partners or to related Bowling organisations and Associations as part of normal Bowling-related activities
 - to meet the Club's operational needs
 - to register or enter Members, at their request, in competitions or on courses managed by other Bowling organisations
- Much content of the Club's website is 'open' (i.e. content is not protected)
 - names and contact (phone and e-mail) information of Club Officials is openly available on the Club's website, primarily for the purpose of enabling Officials and Members of other Bowls Clubs and Bowls Associations, and other organisations having dealings with the Club, to contact the appropriate official of the Club.

Protection, in context, means how the Club limits visibility/access to such data to those with a reasonable need to see or to access it, and to avoid inadvertent unauthorised disclosure.

Techniques deployed by the Club and its Officials for various types of personal data documents/records include:

1. Soft-copy documents

- password protection of any club-held soft-copy document controlled by the Club and containing a Member's personal data.
 - the use of a common club password for such files is to be used both during document development, and for final version, whether published generally (typically website, or e-mail distribution) or just held by one or more Club Officials.
 - much of the personal data, primarily name and contact information (excluding address and/or "special categories" of more sensitive personal information) is valid to be shared within the Club Membership.
 - other personal data, such as address, is not to be made generally available to all Members, nor to Committee Members other than those directly responsible for membership records (Assistant Secretary), and/or hard-copy mailing (Secretary).
 - this password should be reapplied immediately by anyone further manipulating or converting such a file.
- Any personal computer of a Club Official on which such data is held shall have current security software, or the equivalent for any 'smart' device.

2. Hard-copy documents (where such documents constitute a 'filing system', managed by each such official), whether

- Clubhouse-located
 - clubhouse notice boards, contacts list, minutes book, archive books
- Member-residence located
 - at residence of Club Official or any Club Member

Such hard-copy document is required to be

- kept 'under lock and key' at private residences
- kept 'under lock and key' in the clubhouse
 - key/combination code available only to Members
 - this element particularly applies to list of Members' contact numbers

It is acknowledged that many notice-board documents which may contain only Member's names in the way of personal information could not be secured in this way.

3. Images

- Soft-copy individual-identifying images (typically soft-copy, but occasionally hard-copy) are intended for use under open display on the club website or clubhouse noticeboard, but will not be posted without specific approval from the subject individual.
 - Image files (or hard-copy) of photographs/videos are typically obtained and held without such identifying information.
 - Text identifying information (tag, label, etc) will be added to any such soft-copy image (either to the image file itself, or as a separate 'label') held by a Club Official only once the specific approval for display has been obtained from the subject.

- If no approval is received, or approval is subsequently withdrawn, then that image will be deleted/destroyed by the image-holding Club Official.

With whom does the Club share such data?

Personal information shared amongst Club Members, including Club Officials, is the contact information allowing communication on general club matters, and participation in competitions, matches, etc.

Personal information may be shared with other Bowling Associations or organisations to which the Club is affiliated where it is needed by those Associations or organisations to allow them to properly administer the sport on a local, regional and national level. Personal information once passed in this way is subject to Data Protection by the receiving Association or organisation.

Personal information may be deemed 'shared' with our website-hosting platform provider, in that a document listing such contact information is held on our website, albeit password-protected for Club Members' use only and its content is not visible to the website-hosting provider's organisation or externally. Photographic/videographic images of club members may also appear on our website.

For those who access, or may additionally subscribe to the 'e-mail alert' notifications service from, our website, such use and GDPR compliance is governed by a specific ['Website Privacy and Use' Policy](#), accessible from each website page.

Some personal (bank account) information may be shared with the Club's bank, for payment purposes.

Members' personal information controlled by the Club is not otherwise shared with external organisations, nor is it sold for marketing purposes.

How long does the Club retain such data?

We retain personal data for as long as it would be consistent with the declared use of that data by the Club.

- The Club will maintain and retain appropriate Membership records for a period after the expiry of the current Membership year, typically for
 - Accounts queries relating to payments or affiliations, etc
 - Insurance claim liability
- The appropriate period may differ between types of data and its means of storage. For example
 - Club 'Honours' boards will retain a Member's name for an extended (potentially unlimited) number of years
 - Club Committee and General Meeting minutes, which may contain a Member's name, and potentially associated information, will be retained for a number of years, consistent with meeting minute record-keeping needs
 - Club income and payment records, but excluding any personal bank account information, will be retained for several years, consistent with financial record-keeping needs
 - Personal bank account information will be held by the Club only until each deposit or payment process is complete.

Process for an ex-Club Official no longer ‘in post’, but who would have held Members’ personal information

In such circumstances, on stepping down from that role, it remains that ex-official’s responsibility to

- relinquish ownership of all personal information either to his/her successor in the role, or failing that, to the Club Secretary, or delete/destroy all personally-held copies (hard-copy and soft-copy, including soft-copy back-ups), of that data.
- declare formally to the Club, via the Club Secretary, that s/he has completed that task, with details, and no longer holds any personal information of the Club’s members, as part of the legal obligations of the Club, via its officials, and as a Member of the Executive Committee which is the declared GDPR ‘Data Controller’.

This responsibility will be included in the next modification to the Job Descriptions of Club Officials, and into the Constitution, in a way similar to that of Club Officials with banking/cheque-signing authority ([Constitution 2018, Clause 11c](#)).

How does the Club get permission from its Members to collect and store their personal data, and how does the Club provide Members with its Data Privacy Notice?

- A condition of membership (regular, temporary or ‘Friend’), and which is reflected on each application and renewal form being signed by the Applicant/Member, is that the Applicant/Member accepts and agrees that the club will (continue to) hold and process personal data, as described in the Club’s [Data Privacy Notice](#). The Applicant’s/Member’s signature on the appropriate application/renewal form signifies this acceptance/agreement. The Club will provide a copy of the Data Privacy Notice to new Applicants, or to Members without an online presence, on request; a summary will be on the reverse of each relevant form.
- At each membership renewal (typically in Spring, prior to season-start) existing Club Members and Friends signing their membership renewal form will do so to accept, and agree to, the Club’s [‘Data Privacy Notice’](#) (with a link to this notice provided in each such form) as a condition of membership renewal acceptance by the Club.
- The Club’s [‘Data Privacy Notice’](#) is permanently posted on the Club’s Website. The Club’s specific [‘Website Privacy and Use’ Policy Notice](#), is accessible from each of the Club’s website pages to Users / Subscribers.
- For a Member’s personal bank account information,
 - submission to the Club of a Member’s cheque is deemed implicit consent by the Member to the temporary holding by the Club of the cheque containing bank account information.
 - for an EFT payment from the Club to the Member, a specific consent is required from the Member when providing their bank account details for EFT payment processing by the Club.
- For individual-identifying images, a specific approval request is provided to the individual(s) who are, or would be, identified prior to individual-identifying information being added. If approval is not received, each such image will be deleted/destroyed.

Responding to a Member exercising their right to see, and separately to request deletion of, their personal data records

On receipt of a subject Access Request under GDPR Article 15, the Club will provide the Member with a copy of their personal information that the Club maintains. This request may be subject to a fee not exceeding that prescribed and permitted by law.

On receipt of a subject Deletion Request under GDPR Article 17, the Club will delete the personal data of a Member, but with certain limitations as allowed by the legislation.

- Contemporary records displaying that Member's personal data to other Members would be withdrawn to action such a request.
- For the club's formal records, managed by selected Club Officials but not generally made available to other Members, deletion will be effective after an appropriate period.
 - Such a period is required by the Club in order for it to maintain appropriate and adequate records of its Members for several years.
 - The appropriate period may differ between types of data and their means of storage.

What is the Club's Process for deleting personal data?

Routine deletion of personal data takes place in a managed way, typically after each season end, when 'expired' personal data is to be deleted/destroyed by each responsible Club Official.

Deleting specific personal data as a result of a Member's accepted ('Article 17') request requires an instruction to all identified holders of the subject data to delete that data, and compliance response.

An acknowledgement from all such data holders that the deletion/destruction of relevant records has occurred is required for each type of circumstance (annual or on individual request) and is to be returned on completion to the Club Secretary, on behalf of the Club Executive Committee.

What is the Club's Policy for managing any data breach?

In the event of a data breach posing a threat to the privacy of any Member's personal information held by the Club, becoming known to the Club, the Club will investigate and, within 72 hours, will then inform each identified affected Member.

The Club will take appropriate measures to safeguard other data, to re-protect data identified as involved in the breach, and to minimise the risk of recurrence.

Subsequent Change to this Policy

For any material change to this policy, the policy will be republished with a changed version identifier, and with changes marked. Any such change may require a corresponding change to the Club's [Data Privacy Notice to Members](#), for which the Club will use best endeavours to give Members reasonable notice, unless the Club is prevented from so doing. Where required by law, the Club will seek consent from its Members for changes in the way that Members' personal information is managed and used.

******* End of Document *******

Revision History:

July 2020: Revised provisions for members' bank account details

February 2020: Revised to reflect outbound EFT member payments, and other minor changes

January 2019: First published