



Cambridge Park Bowling and Sports Club Ltd Data Protection Policy

- Contents

SCOPE OF THE POLICY	1
WHY THIS POLICY EXISTS	1
DATA PROTECTION PRINCIPLES	2
JUSTIFICATION FOR PERSONAL DATA	2
Accountability and Governance	3
Lawful, Fair and Transparent Data Processing	3
Accuracy of Data and Keeping Data up to Date	3
Adequate, Relevant and Limited Data Processing	4
Processed for Specified, Explicit and Legitimate Purposes	4
Sharing Data	4
Special Categories of Personal Information	5
General Guidelines for Board Members, Committee Members and Team Captains	6
Secure Processing	7
Subject Access Request	7
Data Breach Notification	7

SCOPE OF THE POLICY

This policy applies to the work of Cambridge Park Bowling and Sports Club Ltd hereafter called the Club. The policy sets out the requirements that the Club must meet to gather personal information for membership purposes.

It details how personal information will be gathered, stored, and managed in line with data protection principles and the General Data Protection Regulation.

The policy is reviewed on an ongoing basis by the Club Board to ensure that the Club is compliant. This policy should be read in tandem with the Cambridge Park Bowling and Sports Club Ltd Privacy Policy.

WHY THIS POLICY EXISTS

This data protection policy ensures that the Club:

- Complies with data protection law and follows good practice.
- Protects the rights of members, staff, customers and partners.
- Is open about how it stores and processes members data.
- Protects itself from the risks of a data breach.



DATA PROTECTION PRINCIPLES

The General Data Protection Regulation identifies 8 data protection principles.

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner.

Principle 2 - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.

Principle 4 - Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.

Principle 5 - Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

Principle 6 - Personal data must be processed in accordance with the individuals' rights.

Principle 7 - Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against.

JUSTIFICATION FOR PERSONAL DATA

- The GDPR requires organisations to justify why they use your personal data and specify which of the six 'Lawful Basis for Processing@ they are assigning to each task.
- The six justifications are:
- To serve your group's legitimate interest.
- Because you have explicit consent from the person whose data it is.
- To fulfil a contract.
- To meet a legal obligation.
- To protect someone's life.
- To perform a public task



Accountability and Governance

The Club Board is responsible for ensuring that the Club remains compliant with data protection requirements and can evidence that it has.

For this purpose, those from whom data is required will be asked to provide written consent. The evidence of this consent will then be securely held as evidence of compliance.

The Board shall ensure that new members joining the Boards and Committees receive an induction into how data protection is managed within the Club and the reasons for this.

Board Members and Committee Members shall also stay up to date with guidance and practice within the Club and should any uncertainties arise appropriate action can be taken. The Board will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

Lawful, Fair and Transparent Data Processing

The Club collects personal information from potential members and members for the purpose of sending communications about their involvement with the Club. It does this by way of a paper membership form. We will hold your personal data for as long as you are a member of the club.

Your personal data is held on paper membership forms held securely in the locked office. Personal Data is also held on the web-based accounting system and the electronic point of sale system used to process membership fees. Pictures and names may be held on the Club Website.

The forms used to collect personal information will contain a privacy statement informing potential members and members as to why the information is being requested and what the information will be used for.

The Club members will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once a Club member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken.

Accuracy of Data and Keeping Data up to Date

The Club has a responsibility to ensure members' information is kept up to date. Members will be informed to let the membership secretary know if any of their personal information changes.

In addition, on an annual basis the membership renewal forms will provide an opportunity for members to resubmit their personal information and reconfirm their consent for the Club to communicate with them.



Adequate, Relevant and Limited Data Processing

Members of the Club will only be asked to provide information that is relevant for membership and club management such as registering and administering your membership and informing you of statutory items, such as AGM notices.

The data we require is as follows:

- Name.
- Postal address.
- Email address.
- Telephone number.
- Date of Birth or age bracket.
- Car details
- Payment details

The lawful basis for processing this information is Legal obligation and Contract.

Processed for Specified, Explicit and Legitimate Purposes

Members will be informed as to how their information will be used and the Club will seek to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

For matches and competitions:

- Sharing contact details with club captains, vice-captains, or team managers to help manage team selection for matches.
- Sharing contact details with internal league organisers.
- Sharing contact details with opponents and other bowls clubs to help arrange competitions.

You can ask for details not to be shared, but this would make it difficult for your inclusion in matches and competitions.

For social activities:

- Sending information on Club events, such as social evenings and club competitions
- Sending information on Club news.
- To facilitate coaching

The lawful basis for processing would be Legitimate Interest.

Sharing Data

If you have joined as a playing member, we are required to share your details with the National Governing Bodies and Middlesex Bowling Associations This is to validate your affiliation.

The lawful basis for processing is Consent.



Special Categories of Personal Information

We ask for health information and emergency contact details which are classes as 'Special Category Data' and requires greater protection, because of its sensitive nature. It is optional whether you provide these details. It is used by the National governing Body and Sports England for the purpose of equal opportunities monitoring and to promote a sports environment that is inclusive, fair, and accessible. Medical and Health information is also used by the Club to ensure your health and safety, assess your fitness to participate and to provide appropriate adjustments.

- This includes:
- Emergency Contact name, relationship to member and contact telephone number.
- Ethnicity
- Gender
- Medical and Health Conditions
- Clothing size

The lawful basis for processing this information is Explicit Consent, Contract and legitimate interest.

When next of kin information has been provided, the Club will require the member to gain consent from the identified next of kin. The consent will provide permission for the information to be held for the purpose of supporting and safeguarding the member in question. Were this information is needed as a one off for a particular trip or event, then the information will be deleted once that event or trip has taken place unless it was to be required – with agreement – for a longer purpose. The same would apply to carers who may attend either a one-off event or on an ongoing basis to support a Club member with the agreement of the Club.

There may be occasional instances where a members' data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or the Club and where the Club has a substantiated concern then consent does not have to be sought from the member.



General Guidelines for Board Members, Committee Members and Team Captains

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members of the Club.
- Data should not be shared informally or outside of the Club.
- The Club will provide induction training to Board members, Committee Members and Team Captains to help them understand their responsibilities when handling personal data.
- Board members, Committee Members and Team Captains should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Personal data should not be shared outside of the Club unless with prior consent and/or for specific and agreed reasons.
- Member information should be reviewed, and consent refreshed periodically via the membership renewal process or when policy is changed.

The Club will ensure that team captains are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending Club members marketing and/or promotional materials from external service providers.

The Club will ensure that members' information is managed in such a way as to not infringe an individual members rights which include:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.



Secure Processing

The Board Members and the Committee Members of the Club have a responsibility to ensure that data is both securely held and processed. This will include:

- Board and Committee members using strong passwords.
- Board and Committee members not sharing passwords.
- Restricting access of sharing member information to those on The Board and Committees who need to communicate with members on a regular basis.
- Using password protection on laptops and PCs that contain or access personal information.

Using password protection or secure cloud systems when sharing data between Board Members, Committee Members and/or Team Captains. The Board has scrutinised the Terms and Conditions of each supplier and judge that they are General Data Protection Regulation (GDPR) compliant.

Subject Access Request

Club members are entitled to request access to the information that is held by the Club. The request needs to be received in the form of a written request to the Membership Secretary of the Cambridge Park Bowling and Sports Club Ltd.

On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. The Club will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

Data Breach Notification

Were a data breach to occur, action shall be taken to minimise the harm by ensuring all Board and Committee Members are aware that a breach had taken place and how the breach had occurred. The Board shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches.

The Chairperson of the Club shall contact the Committee within 24 hours of the breach occurring to notify of the breach. A discussion would take place between the Chairperson and the Committees as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The Board shall also contact the relevant Club members to inform them of the data breach and actions taken to resolve the breach.

If a Club member contacts the Club to say that they feel that there has been a breach by the Club, a Board member will ask the member to provide an outline of their concerns. If the initial contact is by telephone, the Board member will ask the Club member to follow this up with an email or a letter detailing their concern.

The concern will then be investigated by members of the Board who are not in any way implicated in the breach. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Policy review date 1st April 2025

Cambridge Park Bowling and Sports Club Ltd