



Hucknall Titchfield Park Bowls Club

Privacy and GDPR Policy

Date	Content	Author	Position
01/02/2024	Policy Creation	Committee	N/A
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1. **Introduction**

1.1 This policy is written in response to the General Data Protection Regulations that came in to force on 25th May 2018.

1.2 The policy defines the data collected by the Club, how it is used and stored and provides Members with an understanding of their rights regarding the processing of their data.

1.3 The Club must only use the data collected from Members to ensure the running of the Club. Member's data is not shared with anyone outside of the Club with the exception of Bowls England and affiliated leagues, and then for affiliation purposes only.

1.4 The 'Data Controller' for the purposes of GDPR will be 'the Club' through the Committee. Given the nature of the data held and the Club size (as at review of this Policy), the appointment of a 'Data Protection Officer' (DPO) is not mandatory. Data protection concerns should be addressed to the Club Secretary.

1.5 The 'Data Processor' will be the Club Secretary. The Club Secretary will be responsible for overseeing 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.

2. **Collection and Purpose**

2.1 Table of Data:

Data Collected	Purpose
Name	Collected for legal, insurance and affiliation purposes.
Address	Required as the Club offers a facility to have written responses to enquiries by members. This also facilitates shared transport.

Telephone Numbers	Both landline and mobile used for competitions and contact purposes. Allows for members to be part of the club WhatsApp and social media groups where Club specific information is shared.
E-mail address	The Club's preferred means of communication for sharing information with members over competitions, teams, events, general matters, meeting dates and changes in personnel.
Age	To ensure the correct fees are charged. Additionally this is held due to the nature of consent required for young people.
Gender	Competition specific information.
Length of Service	To ensure the Club recognise long-serving members.
Next of Kin	In the event of an emergency or immediate Safeguarding issue.

2.2 The Club does not collect or hold any 'sensitive data' for a member such as health at this current time. Sensitive data requirements are reviewed annually.

3. **Information Collection and Review**

3.1 Data is collected from Members at the point of joining the Club through the Club membership form (season registration beginning at the AGM).

3.2 Where a Member is renewing their membership and before the season commences, information of membership forms is used to ensure accuracy of previously held data.

3.3 The data is held by the Club Secretary and the Club has an expectation that the Club Secretary password protects their computer. In the event that a hard copy is held by the Club Secretary or Club Membership Secretary should the club facilitate the role, the Club has an expectation that the documentation is kept in a locked cabinet.

4. **Data Accessible to other Members and Third Parties**

4.1 Specific post-holding members of the Club may require limited access to member data. These members will only be given the information required to carry out their role and only with explicit permission from the Club Secretary. These include but are not limited to Club Captains, Committee Members, Club Welfare Officers and internal competition organisers.

Role	Information shared
Club Committee Members	Name, Address, Phone Number(s), E-mail Address, Next of Kin
Club Captains and Welfare Officers	Name, Phone Number(s), E-mail Address

4.2 It may be necessary for the Club to share information with parties outside the Club in certain circumstances. In the event that information would be shared, the owner of that information must confirm they agree to the information being shared. The Club anticipates this will only be organisations the Club is affiliated with, however permission will always be sought from the persons named, irrespective of the party making the request.

4.3 The Club insist that external organisations do not further share the data or use it for any other purpose except communications (or publications if agreed). The Club will never release Member data to any other organisation for marketing or other purposes.

4.4 Members may be asked to provide information on entry to County or District Competitions. This area is not a matter covered by the Club and is therefore dealt with by the Policy of the respective competition.

4.5 The Club will not publish any personal data on the club website except names and positions of Club officers and competition winners.

5. **Member's Rights**

- 5.1 All Club Members have the right to be provided with a copy of the data held by the Club relating specifically to them. Any request should be made in writing (e-mail accepted) to the Club Secretary. The Club has one month to reply to any request.
- 5.2 In the event a member leaves or does not renew their membership, the data held on that Member will be kept by the Club until no later than the opening day of the next season, unless that Member legitimately exercises their right to erasure.
- 5.3 In the event a member is being investigated for breaching a Club policy, or has previously breached a policy, their information will be held until the end of the following season.

6. **Young Persons Data**

- 6.1 As the Club maintains affiliation with Bowls England (BE), their requirements concerning young people are taken into consideration. If any club Member is below the age of 18, permission for the collection and use of their data will be sought from the parent/guardian(s) of the young person. Furthermore, the young person themselves will also be required to provide this consent.
- 6.2 Any member requiring contact with a young person should approach the Club Secretary to seek agreement for the release of contact details.
- 6.3 The Club will review this Policy annually alongside the Safeguarding Policy.
- 6.4 Consent forms must be reviewed and updated annually by the Club Secretary. Each season new consent forms should be sought from the young person and from the parent/guardian.

7. Breaches

- 7.1 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 Secretary 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 Club Committee.
- 7.2 Where a breach is likely to result in a serious risk to freedoms of individuals, the Club Secretary has 72 hours to report the incident to the Information Commissioners Office (ICO).
- 7.3 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 a minimum possible.

8. Consent

- 8.1 On applying to join the Club, a member will be signposted to (or given, where practicable) this Policy and asked to confirm that they have read and accept it. The Member will be asked to provide consent for the Club to contact them through mail, e-mail and/or phone. Such communications will be restricted to Club matters only including but not limited to BE issues, club meetings, minutes and events, availability and selection, internal competitions and other Club related material.

9. Safeguarding

- 9.1 Sharing information, with the right people, is central to good practice in safeguarding adults at risk. However, information sharing must only ever be those with a 'need to know'. This does **not** automatically include the persons spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/friends/carers need to know in order to help keep the person safe.

9.2 There are situations in which it is perfectly legal to share information about adult safeguarding concerns outside of the Club. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want the information to be shared. This may be because they fear repercussions from the person cause harm or are scared that they will lose control of their situation to statutory bodies or because they feel embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information. When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them. Those reasons are as follows:

- It is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- You believe they or someone else is at risk, including children.
- You believe the adult is being coerced or is under duress.
- It is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.
- The adult does not have mental capacity to consent to information being shared about them.
- The person causing harm has care and support needs.
- The concerns are about an adult at risk living in Wales or Northern Ireland (where there is a duty to report to the Local Authority).

Further Reading

GDPR UK - <https://ico.org.uk/for-organisations/data-protection-and-the-eu/data-protection-and-the-eu-in-detail/the-uk-gdpr/>

ICO - <https://ico.org.uk/>

HTPBC Website - <https://hucknallbowls.co.uk/>

Bowls England - <https://www.bowlsengland.com/gdpr/>

APPENDIX A

CONSENT FORM – YOUNG PEOPLE

1. Child / Young Persons Details		
Name		
Home Address		
		Postcode
Telephone Number(s)	Home:	Mob:
Date of Birth	/ /	

2. Parent / Guardians Details		
Name		
Home Address		
		Postcode
Telephone Number(s)	Home:	Mob:
Date of Birth	/ /	

3. Emergency Contact Details (if different from above)		
Name		
Home Address		
		Postcode
Telephone Number(s)	Home:	Mob:
Date of Birth	/ /	

4. Additional Questions	
Do we need to provide any extra help, for example because of a disability, or are there any activities that your child cannot participate in?	
Do we need to know about any medical conditions or allergies? (If yes, please provide details of the condition(s) and any medication needed).	

Is there anything else you think we should know?

INFORMATION FOR PARENTS AND GUARDIANS

Hucknall Titchfield Park Bowls Club aims to provide a safe and enjoyable Bowling experience for every child or young person.

To help us do this, please note the following important information.

- All questions on the consent form must be completed and signed by the parent or carer before any child takes part.
- Parents and carers must ensure they notify us of any changes to the information given on the form.
- Parents and carers, where possible, should make arrangements for children to be brought to and from the Club. If a parent or carer is not able to collect their child, the Club needs to know this in advance.
- In the event of the child taking place in an 'away' match, the Captain or named driver will contact the parent or carer and provide full details of transportation to and from the game.
- We cannot take responsibility for any damaged clothing and/or personal items while at the Club.
- Parents and carers should ensure children have sufficient water, food, clothing, sun lotion and medication (where appropriate) for the duration of the games.

I agree to (please tick):

- My child taking part in bowling with Hucknall Titchfield Park Bowls Club.
- HTPBC keeping a record of this form for health and safety reasons.
- Any medical treatment that my child may need to be given in the event of an absolute emergency.
- My child being filmed or photographed during bowls, with the possibility that these photographs/media recording may be used on HTPBC's social media platforms.
- My child attending away matches with the Club

I am aware of the following (please tick):

- The name and contact details of the Club Secretary.
- The name and contact details of the Club Welfare Officer.
- The name of all DBS checked members of the Club.
- A full list of venues that the Club plays at throughout the season.
- If my child is playing in an away match, I will be made aware of where this game is via the fixtures list provided by the Club to me weekly.

Parent/Guardian's Signatures	
Print Name	
Signature	
Date	/ /

INFORMATION FOR CHILD/YOUNG PERSON

I agree to (please tick):

- Taking part in bowls.
- Talk to the Club Welfare Officer (or Captain) if I am not comfortable at any time during the activity so they can help me.
- HTPBC keeping a record of this form so they have the information they need to keep me safe during the activity.
- Receiving any emergency medical treatment that I may need.
- Being filmed or photographed during the activity. I understand that the photographs or film might be used to tell other people about what HTPBC does.

- I understand that enjoying the activity and being safe means I must maintain acceptable standards of behaviour and adhere to safety rules at all times.

Child/Young Person's Signatures	
Print Name	
Signature	
Date	/ /