



Data Protection Policy

1. Introductory Statement

The club's data protection policy aims to set out the manner in which personal data on members are kept and how the data concerned is protected.

This policy has been drafted by the Secretaries and adopted by the Management Committee. It is reviewed regularly at least every 12 months and in conjunction with any changes to UK (European) legislation.

Clubs are obliged to comply with the General Data Protection Regulation (GDPR) enforceable from 25th May 2018.

2. Scope

The policy applies to the keeping and processing of members' personal data, both in manual form and on computer.

Data: means information in a form which can be processed. It includes automated data (information on computer or information recorded with the intention of putting it on computer) and manual data (information that is kept as part of a relevant filing system).

Personal data: means data relating to a living individual who is or can be identified from the data that is likely to come into the possession of the data controller.

Data Controller: A data controller is the individual or legal entity which controls the contents and use of personal data. The Management Committee can be considered to be the data controller, with the Club Secretaries and Treasurer principally acting for the Management Committee in exercising the functions involved.

3. Rationale

To be able to keep members up to date with information, and advise in respect of specific requirements they may undertake, the club must maintain a register of all current members.

The data controller may need to supply personal data to the data controller of another prescribed body if they are satisfied that it will be used for a "relevant purpose" only.

The data controller may need to supply personal data to another member of the club for the purpose of arranging a specific action related to the objectives of the club.

4. Objectives

The objectives are:

- To ensure that the club complies with the GDPR.
- To ensure compliance by the club with the eight rules of data protection as set down by the Data Protection Commissioner.
- To ensure that the data protection rights of club members are safeguarded.

5. Key measures

A. The personal data records for members held by the club either digitally on computer and/or manually on paper may include:

- Name, postal address, telephone numbers, email address, date of birth.
- Date joined club and membership type (Playing, Associate, Vice President, Temporary)
- Emergency contact number in case of accident/emergency
- Original records of membership application
- Membership renewal records
- Members bank details
- Details of complaints and/or grievances including discussions and actions/sanctions
- Photos from events of club members
- Competition and match information containing members names displayed on Club Noticeboards
- Records in relation to appointments to the various Committees.
- Minutes of the various Committee meetings and associated correspondence which may include references to particular individuals.

B. Details of arrangements in place to ensure compliance with the 8 rules of data protection

The policy sets out the arrangements in place to ensure that all personal data records held by the club are obtained, processed, used and retained in accordance with the following eight rules of data protection (based on the Data Protection Acts):

1. Obtain and process information fairly
2. Keep it only for one or more specified, explicit and lawful purposes
3. Use and disclose it only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up-to-date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it for no longer than is necessary for the purpose or purposes
8. Give a copy of his/her personal data to that individual on request.

The minimum age at which consent can be legitimately obtained for processing and disclosure of personal data under rules 1 and 3 above is not specifically defined. However, guidance material published on the Data Protection Commissioner's website states the following:

“As a general rule, a member aged eighteen or older may give consent themselves. A student aged from twelve up to and including seventeen should give consent themselves and, in addition, consent should also be obtained from the parent or guardian. In the case of junior members under the age of twelve consent of a parent or guardian will suffice.”

1. Obtain and process information fairly:

- Procedures are in place to ensure that members, parents/guardians or carers are made fully aware when they provide personal information, of the identity of the person who is collecting it, the purpose in collecting the data, the persons or categories of persons to whom the data may be disclosed and any other information which is necessary so that processing may be fair.
- Personal information is processed fairly in accordance with the GDPR, with consent being obtained from members, or parents/guardians where required.

2. Keep it only for one or more specified, explicit and lawful purposes:

- People whose data is collected know the reason/s why it is collected and kept
- The purpose for which the data is collected and kept is a lawful one
- The Management Committee are aware of the data kept and the specific purpose

3. Use and disclose it only in ways compatible with these purposes:

- The data is used only in ways consistent with the purpose/s for which it was obtained
- The data is disclosed only in ways consistent with that purpose
- Some personal data can be disclosed to third parties for the purpose of undertaking a match or competition.

Exceptions to disclosure rule:

- Data can be disclosed when required by law
- Data can generally be disclosed to an individual himself/herself or with his/her consent (see 8 below).

4. Keep it safe and secure:

Appropriate security measures are taken against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction.

- Access to the information (including authority to add/amend/delete records) is restricted to authorised Club Officers on a “need to know” basis
- Control on access to information is based on this “need to know” policy
- Computer systems are password protected
- Computer systems contain up to date Virus protection
- Back-up procedures are in operation for computer held data
- All reasonable measures are taken to ensure that Club Officers are made aware of the security measures, and comply with them
- All waste papers, printouts etc. are disposed of carefully
- Steps are taken to ensure that no unauthorised person can access data from computers or manual records
- There is a designated person responsible for security i.e. Security Controller
- There are periodic reviews of the measures and practices in place
- The premises are secure when unoccupied

5. Keep it accurate, complete and up-to-date:

- Clerical and computer procedures are adequate to ensure high levels of data accuracy
- Appropriate procedures are in place, including periodic review and audit, to ensure that each data item is kept up-to-date

6. Ensure that it is adequate, relevant and not excessive:

- The information held is adequate in relation to the purpose/s for which it is kept
- The information held is relevant in relation to the purpose/s for which it is kept
- The information held is not excessive in relation to the purpose/s for which it is kept

7. Retain it for no longer than is necessary for the purpose or purposes:

- Personal data is only kept for the period of time the person is a member and 12 months after in case circumstances have prevented renewal of membership

8. Give a copy of his/her personal data to that individual on request

On making an access request any member (subject to the restrictions in Notes A and B above) about whom you keep personal data, is entitled to:

- a copy of the data which is kept about him/her
- know the purpose/s for processing his/her data
- know the identity of those to whom the data is disclosed
- know the source of the data, unless it is contrary to public interest
- know the logic involved in automated decisions
- a copy of any data held in the form of opinions, except where such opinions were given in confidence.

To make an access request, an individual must:

- apply in writing or by email to the Ladies or Mens Secretary
- give any details needed to help identify him/her and locate the information we may keep.

Handling access requests:

- The Club Secretaries are responsible for handling access requests
- Procedures are in place to provide members with access to personal data about themselves within 1 month of the request in accordance with the Data Protection Acts as detailed above. Identity may be requested.
- Procedures are in place to rectify or erase any inaccurate information as identified by the individual on whom the data is kept, within 1 month of the request being made

6. Implementation Date

This policy was implemented on 2 May 2018

7. Reviewing and evaluating the policy

The policy will be reviewed and evaluated every 12 months by the Club Secretaries and Management Committee