



Policy Relating to Control and Privacy of Data

Introduction

1. This policy concerns the personal information (**data**) held by the Eltham Bowling Club, its security and use. The policy is written with regard to the **Data Protection Acts (DPA), General Data Protection Regulations (GDPR) and The Information Commissioners Office (ICO)** guidelines. 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. Whilst the Club is bound by **DPA** and **GDPR** and the guidelines of the **ICO**, it has been established that due to registration exemptions, the Club does not need to register with the **ICO**. For the remainder of this document Eltham Bowling Club will be referred to as the 'Club'.

Use of Data

2. The Club uses this data solely for the purposes of the effective running of the Club. It also shares certain data with the North West Kent Bowls Association (NWKBA), Kent County Bowling Association (KCBA) and Bowls England (BE) for their purposes in administering our sport.

Control of Data

3. 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 **Membership Secretary** who acts as the Data Controller. A copy of the membership data will be held by the **Club Secretary**. The Membership Secretary will be responsible for the collection of the data; for its security; for ensuring that permission for the data to be held, used, and shared as described below is given; and for updating of club records including deletion where required.

What Data is Collected and Why

4. We collect membership details to enable us to properly manage and administer your membership with us. These details include your contact details, date of birth, gender, and details of a contact in case of emergency. This information is required and collected as a standard part of your application to join or re-join our Club. Parts of the collected data may be shared with other Club officers to ensure the smooth running of the club; for example Team Captains and Club Social Media Administrators. Emergency contact details will be kept securely in the bar area accessible to club officers only. Some of these details may be shared with the NWKBA and BE for registration and insurance purposes.

5. We may also need to collect ethnicity and certain health information for the purposes of equal opportunities monitoring and because we must promote an environment that is inclusive, fair, and accessible to all. The Club does not collect or hold any other ‘sensitive data’.

6. The table below summarises the types of data collected and the reasons for collection.

Data Collected	Reason for Collection
Name	This is necessary for member identification, insurance and licensing purposes. The Club is entitled to be aware of who is permitted to be on its premises.
Address	Required so that club information can be sent to members, who do not have an e-mail address. It also facilitates shared transport arrangements.
Phone Number	Home and mobile numbers are requested for contact purposes.
E-mail address	Prime means of communication with members over teams, events, general matters.
Date of Birth	Date of Birth is required to ensure that members pay the correct membership fee and are qualified to enter certain competitions. Will also facilitate analysis for Club eligibility for Council grants, etc.
Gender	Some competitions are gender specific.
Date of Joining Club	To enable long-serving members to be identified.
Disability	To allow the Club to fulfil its safeguarding duties and make necessary adjustments. Also requested by BE and NWKBA for statistical analysis and equal opportunity monitoring.
Emergency Contact Details	In case of accident or sudden illness of a member.
Parent Contact Details	Required for any junior member under 18.

When is the Data Collected and Reviewed?

7. This data is captured when a member first joins the Club through a Club Membership Application form and will be reviewed annually when a member renews their membership.

Who Collects and Holds the Data?

8. The data is collected by the Membership Secretary. The data is held on the club’s secure membership dataset. The dataset is protected by a password known only to the Membership Secretary and the Club Secretary. The Club requires that access to their computers is password protected and that any file holding the information is also individually password protected.

Sharing Personal Data outside the Club

9. Some data is shared with the NWKBA and with BE, so that they too can properly manage and administer a member’s affiliated membership with them. These organisations have their own similar data protection policies.

10. Neither the Club, nor the NWKBA, nor KCBA, nor BE permit the sharing of personal data to any third party whatsoever. Specifically, personal data will not be released to any other organisation for marketing or communication purposes.

11. Where direct consent is given by a member having an identified responsibility or role within their Club, specific and limited information may be published by the Club 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 the Club 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

12. Each individual member has the right to view their personal data held on the Club's membership dataset, which they may request from the club's Data Controller. The Data Controller must supply the required data within one month and they must immediately amend or delete data, when requested to do so by an individual member. There will be no charge for such access to data. The data held on a member will be deleted at the end of the relevant membership year. An exception to this would be in relation to disciplinary issues, but only relevant identification details need to be kept.

Young People's Data

13. 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. Any member requiring contact with a young person should approach the Club Secretary or Membership Secretary to seek agreement for the release of contact details.

Breaches of Data Security

14. 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 Executive Committee, who is responsible for investigating breaches of security, determining the resultant degree of risk and deciding on the action to be taken.

15. 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 Data Controller has 72 hours to report the incident to the Information Commissioners Office (ICO). This is required even though the Club is not registered.

16. 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 to the Holding and Use of the Data

17. On applying to join the Club, a member will be asked to confirm that they have read and accepted an endorsement that the Club may use the personal data in the proper pursuance of managing their relationship with the member.

18. In addition, members will be asked to consent to the publication and use of photographs.

19. The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

Reviews

20 It is expected that the Club data processors will update individuals' personal information if a change is notified during the year. At the annual subscription renewal, members will be asked to confirm the accuracy of the data held on them. At that time members will be asked to reconfirm their consents as described above.

21 Revision dates will be recorded at the end of this document.

Executive Committee Eltham Bowling Club

Revision History

Date	Version	Description of change
30/11/2025	V0.1	Policy draft
09/12/2025	V0.2	Addition of KCBA to para 2
06/01/2026	V0.3	Additions to para 4 and 15.
13/02/2026	V1.0	Approved by Committee