

# **Baslow Sports Field Charitable Incorporated Organisation – (BSFCIO): General Data Protection Regulations (GDPR) Policy Document**

## **1. Introduction**

GDPR replaces the existing data protection legislation and necessitates changes in how BSFCIO collects, stores and processes the personal data of users and supporters. It will come into force even though Britain is leaving the European Union.

Personal Data means any information relating to our members which can be used to identify them.

In order to function BSFCIO, and its affiliated clubs (Bowls, Cricket, Football and Tennis) need to collect and use certain types of information about the Individuals or Service Users with whom we come into contact in order to carry on our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material.

The GDPR legislation ensures safeguards to protect this data. This policy document outlines BSFCIO GDPR responsibilities.

## **2. Implications of GDPR for BSFCIO:**

- a. Members of affiliated clubs are also members of BSFCIO. For constitutional reasons, the CIO will occasionally need access to members' personal data
- b. The CIO has to keep a record of its few "Direct Members"
- c. The CIO is required to provide the Charities Commission with Trustees' personal data
- d. BSFCIO has CCTV. Thus it is required to register with the Information Commissioners Office (ico).
- e. From time to time the CIO uses select photographic images of sports people of all ages who use its facilities
- f. BSFCIO has a responsibility to ensure that its affiliated clubs, and other clubs and groups, who use its facilities are GDPR compatible

Each of the above will be dealt with in the following paragraphs

## **3. Members** (see constitution Para 9 a 1)

- a. Put simply, membership of BSFCIO is open to anyone who is also a paid-up member of an affiliated club and lives within a ten-mile radius of the sports field
- b. On rare constitutional occasions (e.g. Annual General Meeting, Emergency General Meeting) it will be necessary for the CIO to have access to membership details. This does not necessitate the need for the CIO to maintain personal data – just to have access to that data when the need arises – so that members

can be verified as bone fide members of the CIO and thus legitimately participate in the constitutional process

- c. Additionally there will be occasions when the CIO wishes to circulate marketing material to its members. When this need arises the CIO will request the necessary personal data from its affiliated clubs.
- d. In neither of the above two examples is there a requirement for the CIO to collect and maintain the personal data of its members on a long-term basis. Any personal data collected to meet the short-term needs of the CIO must be deleted as soon as the initial requirement has been met.
- e. However, there is a requirement for affiliated clubs to ensure that BSFCIO is a third party who occasionally will request access to the personal data of their members

#### **4. Direct Members** (see constitution Para 9 a 2)

- a. A Direct Member of BSFCIO is a person who pays a direct membership fee to the CIO. For such members the Secretary of the CIO will collect and manage personal data as follows: full name, D o B, address, date of becoming a Direct Member and fee paid. This data should be kept on a secure computer and deleted as soon as the person in question ceases to be a Direct Member.
- b. Although the number of Direct Members is likely to remain very small good practice should be followed.

#### **5. Charities Commission – Trustees**

- a. The Charities Commission requires that BSFCIO provides personal data of Trustees as follows: Name, address and D o B. This data is collected on paper and submitted electronically to the Charities Commission who are the Data Controllers in this matter. Once submitted and verified then there is no need for the CIO to hold this data.

#### **6. CCTV**

- a. BSFCIO operates a CCTV system. This is formally registered with the ico. The policy document can be found at:  
<https://baslownetballclub.files.wordpress.com/2016/11/cctv-policy-290616.pdf>

#### **7. Photographic Images**

- a. From time to time BSFCIO uses appropriate photographic images to promote its interests. When doing so it is essential that correct procedures are followed to obtain the permission of any person shown in the photographs or, in the case of children, the permission of a responsible adult.

**8. Affiliated clubs** and other clients who use our facilities

- a. BSFCIO has a duty of care to ensure that its affiliated clubs and other groups who use its facilities follow GDPR guidelines. To this end the CIO should appoint one of its Trustees with responsibility for Data Protection. Their prime responsibility is to ensure that the CIO and affiliated clubs abide by GDPR requirements. To this end there will be an annual audit of the CIO and its affiliated clubs assessing GDPR compliance. The outcome of this audit will be reported to the BSFCIO AGM each year.

**BSFCIO Data Protection Policy**

**May 2018**