

Broomfield Cricket Club DATA PROTECTION POLICY

The Governing Committee of this Club has overall responsibility for ensuring that records are maintained, including security and access arrangements, in accordance with General Data Protection Regulation and all other statutory provisions.

The Governing Committee of this Club will comply fully with the requirements and principles of the General Data Protection Regulation. All volunteers involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities within these guidelines.

1. Enquiries

1.1 Information about the Club's Data Protection Policy is available from the BCC website: <https://broomfieldcc.secure-club.com>. General information about GDPR can be obtained from **the Data Protection Commissioner (Information Line 01625 545 745 website www.ico.gov.uk)**

2. Fair Obtaining and Processing

2.1 BCC undertakes to obtain and process data fairly and lawfully by informing all data subjects of the reasons for data collection, the purposes for which the data are held, the likely recipients of the data and the data subjects' right of access. Information about the use of personal data is printed on the appropriate collection form. If details are given verbally, the person collecting will explain the issues before obtaining the information.

3. Data Integrity

The Club undertakes to ensure data integrity by the following methods:

4. Data Accuracy

4.1 Data held will be as accurate and up to date as is reasonably possible. If a data subject informs the Club of a change of circumstances their computer record will be updated as soon as is practicable. The data record will be reviewed periodically to ensure accuracy.

4.2 In circumstances where a data subject challenges the accuracy of their data, the Club will immediately mark the record as potentially inaccurate, or 'challenged'. In the case of any dispute, we shall try to resolve the issue informally, but if this proves impossible, disputes will be referred to the Governing Committee for their judgement. If the problem cannot be resolved at this stage, either side may seek independent arbitration. Until resolved the 'challenged' marker will remain and all disclosures of the affected information will contain both versions of the information.

5. Data Adequacy and Relevance

5.1 Data held about people will be adequate, relevant and not excessive in relation to the purpose for which the data is being held. In order to ensure compliance with this principle, the Club will check records regularly for missing, irrelevant or seemingly excessive information and may contact data subjects to verify certain items of data.

6. Length of Time

6.1 Data held about individuals will not be kept for longer than necessary for the purposes registered. It is the duty of the nominated person to ensure that obsolete data are properly erased in accordance with the Federation Document Retention Schedule.

7. Subject Access

7.1 GDPR extends to all data subjects the right of access to their own personal data. In order to ensure that people receive only information about themselves it is essential that a formal system of requests is in place. Where a request for subject access is received from a User, the Club's policy is that:

- Requests will be processed as any subject access request as outlined below and the copy will be given directly to the requester, unless it is clear that the individual does not understand the nature of the request.
- Requests from minors who do not appear to understand the nature of the request will be referred to their parents or carers.
- Requests from parents in respect of their own child will be processed as requests made on behalf of the data subject (the child) and the copy will be sent in a sealed envelope to the requesting parent.

7.2 Processing subject access requests

(i) Requests for access must be made in writing.

(ii) Players, parents or individuals may ask for a Data Subject Access form, available from the Club Office. Completed forms should be submitted to Robin Baker (*the nominated officer*). Provided that there is sufficient information to process the request, an entry will be made in the Subject Access log book, showing the date of receipt, the data subject's name, the name and address of requester (if different), the type of data required (e.g. Player Record, Personnel Record), and the planned date of supplying the information (normally not more than 30 days from the request date). Should more information be required to establish either the identity of the data subject (or agent) or the type of data requested, the date of entry in the log will be date on which sufficient information has been provided.

8. Authorised Disclosures

8.1 The Club will, in general, only disclose data about individuals with their consent. However there are circumstances under which the Club's authorised officer may need to disclose data without explicit consent for that occasion.

These circumstances are strictly limited to:

- User data disclosed to authorised recipients related to education and administration necessary for the Club to perform its statutory duties and obligations.
- User data disclosed to authorised recipients in respect of their child's health, safety and welfare.
- User data disclosed to parents in respect of their child's progress, achievements, attendance, attitude or general demeanour within or in the vicinity of the Club.
- Data disclosed to relevant authorities e.g. in respect of payroll and administrative matters.
- Unavoidable disclosures, for example to an engineer during maintenance of the computer system. In such circumstances the engineer would be required to sign a form promising not to disclose the data outside the Club.
- Only authorised and trained Volunteers are allowed to make external disclosures of personal data. Data used within the Club by administrative volunteers and will only be made available where the person requesting the information is a professional legitimately working within the Club who **need to know** the information in order to do their work. The Club will not disclose anything on Users' records which would be likely to cause serious harm to their physical or mental health or that of anyone else – including anything where suggests that they are, or have been, either the subject of or at risk of child abuse.

A "**legal disclosure**" is the release of personal information from the computer to someone who requires the information to do his or her job within or for the Club, provided that the purpose of that information has been registered.

An "**illegal disclosure**" is the release of information to someone who does not need it, or has no right to it, or one which falls outside the Club's registered purposes.

9. Data and Computer Security

9.1 BCC undertakes to ensure security of personal data by the following general methods (precise details cannot, of course, be revealed)

10. Physical Security

10.1 No IT is kept at the Club pavilion.

11. Logical Security

11.1. Only authorised users are allowed access to the computer files and password changes are regularly undertaken.

12. Procedural Security

12.1 In order to be given authorised access to the computer, Volunteers will have to undergo checks and will sign a confidentiality agreement. All Volunteers are trained in their Data Protection obligations and their knowledge updated as necessary. Computer printouts as well as source documents are shredded before disposal.

12.2 Overall security policy for data is determined by the Committee and is monitored and reviewed regularly, especially if a security loophole or breach becomes apparent. The Club's security policy is kept in a safe place at all times.

12.3 Any queries or concerns about security of data in the Club should in the first instance be referred to Robin Baker (the person responsible).

12.4 Individual members or Volunteers can be personally liable in law under the terms of GDPR. They may also be subject to claims for damages from persons who believe that they have been harmed as a result of inaccuracy, unauthorised use or disclosure of their data. A deliberate breach of this Data Protection Policy will be treated as disciplinary matter, and serious breaches could lead to dismissal.

Access to Personal Data Request

Name:

Address:

Telephone Number:

Are you the person who is the subject of the records you are enquiring about **YES / NO**

If **NO**,

Do you have parental responsibility for a child who is the "Data Subject" of the **YES / NO**

If **YES**,

Name of child or children about whose personal data records you are enquiring

1)

2)

3)

Description of Concern / Area of Concern:

Description of Information or Topic(s) Requested:

Additional information.

Please despatch Reply to: *(if different from enquirer's details as stated on this form)*

Name:

Address:

Postcode:

Data Subject Declaration

I request that the Club search its records based on the information supplied above under GDPR and provide a description of the personal data found from the information described in the details outlined above relating to me (or my child/children) being processed by the Club.

I agree that the reply period will commence when I have supplied sufficient information to enable the Club to perform the search.

I consent to the reply being disclosed and sent to me at my stated address (or to the Despatch Name and Address above who I have authorised to receive such information).

Signature of "Data Subject" (or Subject's Parent)

Name of "Data Subject" (or Subject's Parent) (PRINTED).....

Dated