



# GDPR Help Guide for Affiliated Clubs and Groups

We have taken information from the ICO official website, and summarised the key points for you. For fuller information and help, please visit the ICO site: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

## Information you hold and how you use it

You should document **what** personal data you hold, **where** it came from and **who** you share it with. You should also create a list that details **how** you use the specific information; for **how long** you keep it; and **how** and **when** you **delete** it. This list will be written proof that you are complying with GDPR. As you write this list, be mindful that you must have valid reasons for storing and using specific information e.g. *Is it important to store the DOB of volunteers?* **Only store and use information that is reasonably justified.**

### Example of data list

WHAT	SOURCE	SHARED WITH	HOW USED	DURATION KEPT	HOW DELETED
Name, address, sex, email address	Adult members (players)	Badminton Scotland; club committee	Affiliation info for BadScot; to communicate with members – share info & advertise events	As long as they are affiliated to club. Deleted after one year of non-affiliation	Electronically deleted. Paper copies either redacted or shredded.
Name, address, sex, parent/carer contact details, emergency contact details, DOB, medical conditions	Junior members (players)	Number and sex of juniors shared with Badminton Scotland; full details shared with lead coach of junior section	Affiliation info for BadScot; pastoral information for lead coach.	As long as they are affiliated to club. Deleted after one year of non-affiliation	Electronically deleted. Paper copies either redacted or shredded.
Name and record of attendance	Junior members (players)	Committee members if required.	E.g. for selection purposes, if selection criteria states that junior players require a minimum attendance rate.	One season	Shredded
Photos of players	Event organisation team (committee/volunteers)	Club website; local newspaper; social media; club archive	Results and news items; archive for posterity	Indefinite, or upon request	Electronically deleted.

## Communicating to your members what information you hold

Once your data list is created and you are happy with it, you should send this out to all adult members to let them see what type of information about them is held, and how you are using it. You should invite them to review their own information that is being held.

You should also review (or create) your current **privacy notice**. A privacy notice should clearly indicate that members could ask to have some or all of their information removed from your database. Your privacy notice

must state that there are particular types of data that, for reasons of safety/affiliation, must be stored, but other types that do not affect their status as a member e.g. *a volunteer must share an emergency contact number in order to safely be enrolled to help; but they might request that their dietary requirements be deleted*. **Irrelevant data cannot be collected as a pre-requisite to affiliation.** However, information that is essential for club operation purposes can be a pre-requisite, and this is detailed in the next section.

### Consent and opt-in to marketing information

GDPR states that members must give consent to their data being stored and processed, and to be given the options to positively opt-in to receive marketing information. For the legitimate purpose of processing club operations (e.g. processing and storing membership details in order to give members information about the club's activities etc.) you can write this into the membership affiliation form i.e. *'by signing this form you agree to your data being processed for legitimate operational purposes of the club'*. **For all your current data, it is acceptable to inform current members and volunteers that their data will be used for legitimate operational purposes, and to opt-out of receiving marketing information.** However, **new members (including existing members if you require fresh membership forms each season) and volunteers must be fully informed of the 'legitimate purposes' consent at the time of completing their form; and they must be given the option to opt-into receiving marketing information.** You should ensure that new affiliation forms reflect this.

For help with creating a privacy notice please visit this site: <https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control/your-privacy-notice-checklist/>

### Individuals' rights – a summary

GDPR provides the following rights for individuals associated with your club/group:

1. The right to be informed of what information about them is stored
2. The right of access to their information
3. The right to rectification of inaccurate information
4. The right to delete their information – either part or all of it
5. The right to restrict the processing of their information

**You should ensure that these rights are reflected in your data list, privacy notice and all communication that you have with your members and volunteers.**

There are other rights for individuals under GDPR too, but these are less relevant for clubs/groups. If you wish to read these, please visit: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### Data controller; data protection officer; and data breaches

You as the club or group are the data controller. You do not need to register with the ICO, however you may wish to take the self-assessment test, just for peace of mind: <https://ico.org.uk/for-organisations/register/self-assessment/> .

Anyone within the club or group who accesses the data is a data processor.

You should designate someone to take responsibility for data protection compliance.

You should make sure you have the right procedures in place to detect, report and investigate a personal data breach. It is **vital** that in the event of a data breach, the individuals affected are immediately informed.