



**Dawlish Lawn
Tennis Club**

DATA PROTECTION POLICY

DOCUMENT TITLE	DATA PROTECTION POLIC.
DOCUMENT OWNER	THE OWNER OF THIS DOCUMENT IS ROBERT ELVER.
DOCUMENT LOCATION	THE ELECTRONIC COPY OF THIS DOCUMENT IS LOCATED WITH THE OWNER. COPY LOCATED IN THE CLUB H&S FILE. COPY ON THE CLUB NOTICEBOARD. COPY ON THE CLUB WEBSITE.

Revision History

Version number	Revision date	Summary of changes	Date Approved by DLTC Management Team
1.0	OCT 2022	Original Document from 2017 updated.	OCT 2022
2.0	MAR 2022	Updated branding (MAR 2024).	MAR 2024

Policy Statement

Dawlish Lawn Tennis Club regards the lawful and correct treatment of personal information as very important to its successful operation and to maintaining the confidence of those with whom we deal. We will always do our utmost to ensure that our organisation treats personal information lawfully and correctly.

To this end we fully endorse and adhere to the Principles of Data Protection as enumerated in the Data Protection Act 1998.

Policy

Dawlish Lawn Tennis Club ("the club") membership records are held electronically and by joining the Club members (and visitors/guests) agree to have their records maintained in this way and accept to receive Club correspondence via e-mail. Dawlish Lawn Tennis Club publishes photographs with names for Club related activities such as the club website, closed Facebook page, newspaper reports, and clubhouse displays. When joining the Club you/your parent/guardian agree to you being included in such photographs/reports. Any members wishing to opt out of this arrangement must do so by electing to not ticking their consent on the club's membership form.

Dawlish Lawn Tennis Club collects and uses personal information about its members and members of the public who make use of the facilities. This information is gathered in order to enable the club to operate for the benefit of its' members. In addition, there are legal requirements to collect and use information to ensure that the club complies with its statutory obligations, particularly in relation to its status as a Community Amateur Sports Club (CASC) and Equality and Diversity standards.

Dawlish Lawn Tennis Club is not required to be registered with the Information Commissioner's Office (ICO) however all data that is held by the club will be stored and processed as per the requirements of the ICO. Requests for information relating to the data that Dawlish Lawn Tennis Club holds on individuals should be made in writing to the Club.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998 (DPA), and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

What is personal data?

The DPA defines personal data as data which relate to a living individual who can be identified:

- a) from those data, or
- b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

The principles of data protection

The DPA gives people the right to know what personal information is held about them and why. When people give information they should be told what it will be used for, and to whom it will be passed. This means that in practice, the Act provides a way in which individuals can enforce the control of information about them. It imposes obligations on those who record and use personal information to be open about how information is used and to follow data protection principles to ensure that the information is handled properly.

The DPA sets out the rules for processing personal information. The eight principles of the DPA are:

- 1) Personal data shall be processed fairly and lawfully.
- 2) Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
- 3) Personal data shall be adequate, relevant and not excessive in relation to the purposes for which they are processed.
- 4) Personal data shall be accurate and where necessary kept up to date.
- 5) Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.
- 6) Personal data shall be processed in accordance with the rights of data subjects under the Act.
- 7) Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction.
- 8) Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Compliance with the Act is overseen by the Information Commissioner's Office (ICO), which is an independent government authority set up to promote access to official information and protect personal information.

Scope

All Dawlish Lawn Tennis Club volunteers and staff who process personal data have a responsibility to ensure that they understand the principles of the Data Protection Act (DPA) 1998. The club is committed to maintaining the principles of the DPA, as such the club will:

- 1) Ensure that all data is held securely and responsibly
- 2) Data will only be processed by those staff/volunteers with a demonstrated need to do so.
- 3) Ensure that all information held is accurate and up to date.
- 4) Review the data that it holds, on an annual basis, to ensure that it is still appropriate to be retained.
- 5) Ensure that all obsolete data is destroyed in a secure manner.

Data controller

As an organisation that is not required to register with the ICO we do not have a registered data controller. Instead this role will be shared by the club Chair, Secretary, Membership Secretary and Head Coaches as these members of the management team have regular unmonitored access to member and guest information.

Review

This policy will be reviewed every three years or as it is deemed appropriate by the Dawlish Lawn Tennis Club Management Team (or if governing legislation changes).