

Chester le Street Ltd Golf Club
EU General Data Protection Regulation

Policy Information

This policy applies to:

- Chester le Street Golf Club Ltd;
- All sections under the control of Chester le Street Golf Club Ltd;
- All staff operating on behalf of Chester le Street Golf Club Ltd.

It applies to all members, paid staff and volunteers.

Policy operational date;	25-05-2018
Policy prepared by:	Data Protection Officer – C Henderson
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Introduction

The purpose of this policy is to enable Chester le Street Golf Club Ltd to:

- Comply with the law in respect of the data it holds about individuals
- Follow good practice
- Protect Chester le Street Golf Club Limited's employees, volunteers, players, members, website users, app users, and any information that could be used to identify any living individual
- Protect the organisation from the consequences of a breach of its responsibilities

GDPR Key Principles

Principle 1: Process data fairly, lawfully and transparently

Personal data must always be processed fairly, lawfully, and with transparency at the forefront of all processing

Principle 2: Purpose Limitation

Personal data may be collected for specified, explicit and legitimate purposes and must not be further processed in a manner that is incompatible with those purposes

Principle 3: Data Minimisation

Personal data must be adequate, relevant and limited to what is necessary for the purpose for which they are collected

Principle 4: Accuracy

Personal data must be accurate and, where necessary, kept up to date

Principle 5: Data Retention

Data must be kept in a form that permits identification of individuals for no longer than is necessary

Principle 6: Data Security

Personal data must be processed in a manner that ensures appropriate technical and organisational security of those data

Lawful Processing

Data we hold and why:

In some instances we act as Data Controller and in others we act as Data Processor.

Most data are held in the ICT system. Some are held, or duplicated, in paper form and organised in folders. These are stored in a locked cupboard.

The sole key holders to the locked cupboard are the Honorary Secretary, the Honorary Treasurer, and the Office Administrator.

The cupboard is located in the administrative office. The sole holders of keys for the office are the Honorary Secretary, the Honorary Treasurer, the Office Administrator, and the Club Captain.

We are required to disclose information regarding playing members to England Golf – so that England Golf may provide the full benefit of membership. This does not require the consent of the individual, as it is necessary for the fulfilment of the membership contract. In addition, England Golf requires personal data regarding club members, such as name, gender, year & date of birth in order to monitor and run the central database of handicaps (CDH). England Golf has a legitimate interest in receiving handicap information, which typically outweigh an individual's privacy interests regarding handicap information. Therefore consent is not required where these grounds apply.

We are also required to disclose information to Durham County Golf Union on member numbers, which are broken down by gender and age categories. This information is used to account for the levies, which are due to DCGU and the portion that is passed on to England Golf. Information on individuals is not shared with DCGU other than we provide names of individuals who are members of the various County & National membership schemes.

We do not hold any bank details in computer systems (Other than SAGE for payroll purposes for current employees only and for reimbursement of any expenses).

If an individual has a finance arrangement with Fairway Credit their bank details are recorded by the club and shared with Fairway Credit. The application form is stored in folders in the locked office cupboard.

A breakdown of data held for categories of individuals is provided below:

If you are an employee

Data we hold	Use	Lawful Purpose	Repository
Name	Paying of Salary, expenses, Pension, and collection of PAYE	The processing is necessary for performing a contract the individual is party to	Payroll System/archive
Address			Payroll System/archive
NI Number			Payroll System/archive
Tax Code			Payroll System/archive
Bank Account Number			Payroll System/archive
Date of Birth			Payroll System/archive
Historical data pertinent to payroll requirements			Payroll System /archive
Contract	Defines terms of employment		Admin Server & Secure Document Storage

If you are a social member

Data we hold	Use	Lawful Purpose	Repository
Name	Definitive data used to identify a member, to send invoices and to collect payments	The processing is necessary in performing a contract the individual is party to	Admin Server & Secure Document Storage
Address			
Telephone Numbers			
Email address			
Date of Birth			
Membership Number			
Gender			
CHIPS number	For door access and to manage member's bar account		

If you are a playing member

Data we hold	Use	Lawful Purpose	Repository
Name	Definitive data used to identify a member, to send invoices and to collect payments	The processing is necessary in performing a contract the individual is party to	Admin Server & Secure Document Storage
Address			
Telephone Numbers			
Email address			
Date of Birth			
Membership Number			
Gender			
CHIPS number	For door access and to manage member's bar account		
Handicap	Admin of Handicaps and Competitions, Shared with the Central Database of Handicaps		

If you are a playing member and blue badge holder

Data we hold	Use	Lawful Purpose	Repository
Name	Definitive data used to identify a member, to send invoices and to collect payments	The processing is necessary in performing a contract the individual is party to	Admin Server & Secure Document Storage
Address			
Telephone Numbers			
Email address			
Date of Birth			
Membership Number			
Gender			
CHIPS number	For door access and to manage member's bar account		
Handicap	Admin of Handicaps and Competitions, Shared with the Central Database of Handicaps		
Blue Badge Registration and confirmation of a medical condition	To ensure adherence to health & safety guidelines for the use of buggies in certain conditions	Consent	Secure Document Storage

If you are a playing member and JLO volunteer

Data we hold	Use	Lawful Purpose	Repository
Name	Definitive data used to identify a member, to send invoices and to collect payments	The processing is necessary in performing a contract the individual is party to	Admin Server & Secure Document Storage
Address			
Telephone Numbers			
Email address			
Date of Birth			
Membership Number			
Gender			
CHIPS number	For door access and to manage member's bar account		
Handicap	Admin of Handicaps and Competitions, Shared with the Central Database of Handicaps		
Details of DBS checks	Need to provide information about individuals to the Disclosure & Barring Service	Complying with a legal obligation	Secure Document Storage

If you are a playing member with Direct Debit Payments

Data we hold	Use	Lawful Purpose	Repository
Name	Definitive data used to identify a member, to send invoices and to collect payments	The processing is necessary in performing a contract the individual is party to	Admin Server & Secure Document Storage
Address			
Telephone Numbers			
Email address			
Date of Birth			
Membership Number			
Gender			
CHIPS number	For door access and to manage member's bar account		
Handicap	Admin of Handicaps and Competitions, Shared with the Central Database of Handicaps		
Bank Sort Code	Administration of Direct Debit Payments which are collected from members' accounts by Premium Credit		
Bank Account Number			

If you are a playing member and a Director of the Golf Club or Trading Subsidiary

Data we hold	Use	Lawful Purpose	Repository
Name	Definitive data used to identify a member, to send invoices and to collect payments	The processing is necessary in performing a contract the individual is party to	Admin Server & Secure Document Storage
Address			
Telephone Numbers			
Email address			
Date of Birth			
Membership Number			
Gender			
CHIPS number	For door access and to manage member's bar account		
Handicap	Admin of Handicaps and Competitions, Shared with the Central Database of Handicaps		
Details required for assessment of fit & proper person	Required by Companies House and registered on their systems		

This policy applies to information relating to identifiable individuals.

Policy Statement

Chester le Street Golf Club Ltd will:

- Comply with both the law and good practice
- Respect individuals rights
- Be open and honest with individuals whose data are held
- Provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently

Chester le Street Golf Club Ltd has identified the following key risks, which this policy is designed to address:

- Breach of Confidentiality (information being given out inappropriately)
- Insufficient clarity about the range of uses to which data will be put - leading to data subjects being insufficiently informed
- Breach of security by allowing unauthorised access
- Failure to establish efficient systems of managing changes leading to personal data being not up to date
- Harm to individuals if personal data is not up to date
- Insufficient clarity about the way staff or volunteers' personal data are being used e.g. given out to fellow members

Responsibilities

The Board of Directors recognises its overall responsibility for ensuring that Chester le Street Golf Club Ltd complies with its legal obligations.

The Data Protection Officer is currently Colin Henderson, with the following responsibilities:

- Briefing the GP Committee on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection Issues
- Ensuring that Data protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data

All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Significant breaches of this policy will be handled under Chester le Street Golf Club Limited's disciplinary procedures.

Security

This section of the policy only addresses security issues relating to personal data. It does not cover security of the building business continuity or any other aspect of security.

Chester le Street Golf Club Ltd has identified the following risks:

- Staff or volunteers with access to personal information could misuse it
- Poor website security might give a means of access to information about individuals once individual details are made accessible on line
- Staff may be tricked into giving away information, either about supporters or colleagues, especially over the phone, through “social engineering”
- Setting security levels Access to information on the main computer system will be controlled in accordance with our E security procedure

Data recording and storage

Chester le Street Golf Club Ltd will regularly review its procedures for ensuring that its records remain accurate and consistent and in particular:

- ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data
- Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes
- Members data held on website will require the permission of the member before the data become accessible to other members. Permissions will be obtained by way of tick boxes required to be completed by each member when they first log on. These permissions may be withdrawn at any time by the member

Data will be stored on site or any other site owned or in control of Chester le Street Golf Club Ltd. These data will not be retained for longer than 1 year following a member’s resignation or for a period of six years in the case of employees.

CCTV

Chester le Street Golf Club Ltd has;

- Installed a CCTV system which produces clear images which the law enforcement bodies can use to investigate crime and these can easily be taken from the system when required.
- Sited cameras so that they provide clear images.
- Positioned the cameras to avoid capturing images of persons not visiting the premise.
- Sited monitors in a position that provides the staff with the security required whilst restricting as far as is practical the ability of the public to see them.
- Placed visible signs showing that CCTV is in operation.
- A limited number of authorised persons that may access the recorded images from the CCTV system, which are securely stored. The recorded images are held for 28 days and with the exception of law enforcement bodies, images will not be provided to third parties.

Policy Review

The policy is to be reviewed on an annual basis or at such time that the Data Protection Act is amended.

Privacy Statement

When you request information from Chester le Street Golf Club Ltd, sign up to any of our services or buy things from us, Chester Le Street Golf Club Ltd obtains information about you. This statement explains how we look after that information and what we do with it.

We have a legal duty under the EU General Data Protection Regulation to prevent the information of an individual from falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

We only hold the data we absolutely need. We do not hold data on racial or ethnic origin; political opinion; religious or philosophical beliefs; trade union membership; genetic data; biometric data for the purpose of uniquely identifying a natural person; health; and sex life or sexual orientation.

Members e-mail address and/or telephone numbers may be given to other current members of the club for the purposes of facilitating activities pertaining to the club, where the information is not currently available on the members directory via the club website.

Normally the only information we hold comes from you. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, services or goods you need. You do not have to provide us with any additional information unless you choose to. We store your information securely on our computer system, we restrict access to those who have a need to know, and we train our staff in handling the information securely. When not attended, the computers are locked so that unauthorised access is not possible.

We may contact you in future to tell you about other services we provide. You have the right to ask us not to contact you in this way. We will always aim to provide a clear method for you to opt out. You can also contact us directly at any time to tell us not to send you any future marketing material.

You have a right to a copy of the information we hold about you. To obtain a copy, either ask for an application form to be sent to you, or write to the data Protection Officer at Chester le Street Golf Club Ltd. We aim to reply as promptly as we can and in any case, within the legal maximum of 30 days.

If you feel the need to complain about any aspect of the security of your data this may be communicated to the Information Commissioner's Office at:

Helpline: **0303 123 1113**

Web Site: ico.org.uk - look for the 'Report Your Concern' tab