

A Quick Guide to GDPR for Halliwick Clubs

a few key points to start with ...



Remember Transparency

- be clear about who's and what data you are processing and why you are processing it
- have a legitimate reason for processing the data and use the data only for that reason
- tell people what data you are processing and why - tell them in your privacy policy



Remember Lawfulness

- be clear about the basis on which you are processing the data and be able to demonstrate that there is one
- if it is data of a special category (eg disability information) or if it concerns direct marketing (eg a newsletter sent to members) make sure you have the individual's consent



Remember Accountability

- have policies in place so you can demonstrate compliance with the principles of the GDPR (privacy policy, data retention policy etc)
- document what you do - if you make a decision, be able to back up that decision and why you made it



Remember Security

- have appropriate technical and organisational measures in place - they don't necessarily have to be sophisticated but the more information there is or the more sensitive the information, the more secure it needs to be
- make sure everyone who handles data knows and works to your policies - provide training

before you work through the processes here, we recommend that you read the presentation slides to give you a basic overview of what GDPR means for Halliwick clubs



draft your privacy policy and data retention policy and take the chance to update your club membership application form

(see examples as to how you might tie in your policies with the application form so that there is a clear process when someone applies for membership)



if you have a website, have the privacy policy prominently accessible
you might also consider providing a link to it in email footers, particularly if you are emailing an enquirer for the first time for example

existing members

- send to all including committee and volunteers
- at the same time, obtain necessary consents

new members/enquirers

- send to all at the first opportunity
- where a prospective member is given an application form for membership, give them a copy of your privacy policy and obtain necessary consents

remember, for general personal data (like name, address etc), consent is not usually needed (you can usually rely on legitimate interest as your lawful basis as the information is not in a special category and you need it to run your club) BUT to process special category personal data (eg concerning someone's disability) or if you send out a club newsletter or similar circular information (which is a form of direct marketing), you will need consent to do this

it may also be prudent to obtain consent to conduct a DBS check re possible new helpers - not strictly necessary perhaps but if someone refuses consent to a DBS then you should be concerned and, at the very least, a discussion may be appropriate

whilst the privacy policy and data retention policy (the example here combines the two) are a good starting point, you may consider developing your policies and procedures internally, for example think about things like:

- who has overall responsibility for processing data in your club? (it will be the management committee/trustees but do you nominate one person to oversee compliance/policies etc?)
- what is your procedure when there is an enquiry/when there is an application for new membership? (what documents are sent and/or completed and returned?)
 - what happens in the event of a data access/rectification/erasure request and who decides what happens?
 - what happens in the event of a breach and who decides what happens?
 - what training is provided to existing and new volunteers who deal with data in your club, who provides it and what are your general policies on data security?