

Lincoln & District Indoor Bowling Club (LIBC)

DATA PROTECTION POLICY – Officials’ Responsibilities

Who Does This Document Apply To?

- Members of the LIBC Board of Directors.
- LIBC Club, Ladies and Over 60s Officials.
- LIBC Team Captains (N.B. CLUB not LEAGUE team captains).
- LIBC Coaches.
- LIBC Staff.
- LIBC Web and SubWeb Editors.
- Anyone else involved in the management and organisation of the LIBC.

What Is Personal Data?

- The GDPR states:
“personal data’ means any information relating to an identified or identifiable natural person “
- As the UK’s Information Commissioner’s Office explains, using an example of “John Smith”:
“By itself the name John Smith may not always be personal data because there are many individuals with that name. However, where the name is combined with other information (such as an address, a place of work, or a telephone number) this will usually be sufficient to clearly identify one individual.”

How Does The Libc Manage Personal Data?

- The LIBC Data Protection Policy document specifies the methods to be used for the acquisition and holding of personal data.

How Does It Affect A Club Member?

- Every member is required annually to sign a Membership Renewal Form. This gives (or refuses!!) their consent for the LIBC to hold and process their personal data, using methods and controls as specified in the LIBC Data Protection Policy document.

How Does It Affect A Club Official?

- The LIBC is responsible for the personal data it holds.
- The GDPR requires the LIBC to know exactly what personal data is held and where.
- This means that no official within the club is allowed to hold members’ personal data unless authorized by the LIBC. The person responsible for issuing this authorization is the Data Protection Officer (DPO) or the person nominated by the LIBC to perform DPO duties (currently the Club Manager).
- The manner of authorization will be by the requestor completing and submitting a LIBC DATA AUDIT form (obtained from the Club Manager or downloaded from the LIBC website). Once authorized, the requestor is responsible for maintaining the document, updating whenever necessary.

Is This All Really Necessary?

- It is the law – GDPR.
- The Information Commissioners Office (ICO) implements the GDPR.
- Their power is similar to the HM Revenue & Customs. Basically, when challenged, you are guilty unless you can prove yourself innocent.
- The GDPR introduced “effective, proportionate and dissuasive” administrative fines of up to 4% of annual global turnover or €20 million – whichever is greater. Ouch.

Will The Ico Ever Investigate Little Old Libc?

- Imagine a dissatisfied member intent on making mischief. One complaint - that’s all it would take.