

HEYES LANE TENNIS CLUB

("The Club")

Heyes Lane Tennis Club, The Circuit, Alderley Edge, SK9 7LT

Community Amateur Sports Club

Privacy Policy

THIS PRIVACY POLICY

This policy sets out how The Club will use and process personal data about individuals, who include the Management Committee, current members, past members, prospective members, in the case of juniors their parents guardians and carers, together the Extended Membership.

Data Protection Law gives individuals the right to understand how their data is used and processed.

Staff, parents and members are all encouraged to read this Privacy Policy and understand the club's obligations to its entire membership.

This Privacy Policy also applies in addition to the club's other relevant terms and conditions and policies, including:

- ✓ any contract between the club and its staff or the parents of members;
- ✓ the club's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded;
- ✓ Anyone who works for, or acts on behalf of, the club (including staff, volunteers, management committee, and parents) should also be aware of and comply with this Privacy Policy, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

Heyes Lane Tennis Club has appointed Jonathan Hare as Data Protection Officer who will deal with all your requests and enquiries concerning the club's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

Heyes Lane Tennis Club is a Data Controller in the context of the Law.

THE PURPOSES FOR PROCESSING PERSONAL DATA

In order to effectively manage The Club on behalf of all the club needs to process a limited amount of personal data about the Extended Membership as part of its daily operation.

Some of this activity the club will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its members.

Other uses of personal data will be made in accordance with the club's legitimate interests provided no personal data is shared with any third party other than for legal and statutory purposes.

The following uses will fall within the category of “**legitimate interests**”:

- ✓ For the purposes of team selection.
- ✓ For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- ✓ For the purpose of contacting members, potential members, past members or junior members’ parents or guardians about their membership and to inform about club activities;
- ✓ To enable relevant authorities to monitor the club’s performance and to intervene or assist with incidents as appropriate;
- ✓ To enable members to take part in national matches and team sports with other members of the club;
- ✓ To safeguard members' welfare and provide appropriate pastoral care;
- ✓ To make use of photographic images of members in club publications, on the club website and (where appropriate) on the club’s social media channels. In accordance with the club’s policy taking, storing and using images of children will require specific permission;
- ✓ To carry out or cooperate with any club or external complaints, disciplinary or investigation process; and
- ✓ Where otherwise reasonably necessary for the club’s purposes, including to obtain appropriate professional advice and insurance.

In addition, the club will on occasion need to process sensitive information and in particular criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- ✓ To safeguard members' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes;
- ✓ In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- ✓ As part of any club or external complaints, disciplinary or investigation process that involves such data;
- ✓ For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED

This will include by way of example:

- ✓ names, addresses, telephone numbers, e-mail addresses and other contact details as required;
- ✓ personnel files in connection with employment or safeguarding;
- ✓ where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- ✓ correspondence with and concerning staff, members and parents past and present;
- ✓ images of members (and occasionally other individuals) engaging in club activities;

HOW WE COLLECT DATA

Generally, the Club receives personal data from the individual directly (including, in the case of junior members, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email).

WHO HAS ACCESS TO PERSONAL DATA

Occasionally, the Club will need to share personal information relating to its Extended Membership with third parties, such as:

- ✓ professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- ✓ government authorities (e.g. HMRC, DfE, police or the local authority); and
- ✓ appropriate regulatory bodies e.g the Information Commissioner, British Tennis.

The Club will not share personal data with other third parties.

Personal data collected by the club will remain within the club, will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of medical issues and allergies.

PERSONAL DATA RETENTION

The Club will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Personal data may be retained by the club for 5 years following departure. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you wish to request personal data that you no longer believe to be relevant is considered for erasure, please contact Jonathan Hare by email info@heyeslanetennis.co.uk.

A limited and reasonable amount of information will be kept for archiving purposes for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

Records are held securely in electronic form.

YOUR RIGHTS

Individuals have various rights under Data Protection Law to have a copy of personal data about them held by the Club, and in some cases ask for it to be erased or amended or have it transferred to others, or for the Club to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to have a copy of, or amend, their personal data, or who has some other objection to how their personal data is used, should contact the Club's Data Protection Officer at info@heyeslanetennis.co.uk. We will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by the club, or documents prepared in connection with a legal action).

"right to be forgotten" - You have this right under current legislation however, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Policy. All such requests will be considered on their own merits.

Consent

Where the club is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent include the use of images. Please be aware however that the club may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Policy or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment contract), or because of a purchase of goods, or services contract.

Interpretation of Rights

The rights under Data Protection Law belong to the individual to whom the data relates. However, the club will often rely on parental authority or notice for the necessary ways it processes personal data relating to the Wider Membership – for example via a form. Parents and members should be aware that this is not necessarily the same as the club relying on strict consent.

In general, the club will assume that members' consent is not required for ordinary disclosure of their personal data to team managers. That is unless, in the club's opinion, there is a good reason to do otherwise.

However, where a member seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the club may be under an obligation to maintain confidentiality unless, in the club's opinion, there is a good reason to do otherwise; for example where the club believes disclosure will be in the best interests of the junior member or other members, or if required by law.

Members are required to respect the personal data and privacy of others, and to comply with the club rules. Staff are under professional duties to do the same covered under the relevant staff contract.

DATA ACCURACY AND SECURITY

The club will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the club of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

The club will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to club systems.

THIS POLICY

The club will update this Policy from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries about this policy should be directed to the Data Protection Officer.

If an individual believes that the club has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should contact the Data Protection Officer or any other member of the Management Committee.

You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the club before involving the regulator.

July 2018