

Information Governance Policy

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Background

The Birmingham Bulls (The Club) considers the safety and security of our members to be a priority. This includes the information that we hold about them.

As well as data about our members The Club may also hold data that may be of a commercially sensitive nature either that of our sponsors or suppliers. It will treat this data in a similar way.

This policy covers

- What information we hold and how The Club uses it.
- Processes for keeping information secure
- Corporate record keeping

Use of Information

In order for the club to run, it needs to hold certain information about our members. At all times the use of this information will comply with the data protection principles.(See Appendix 1).

We share membership information with England Rugby via their Game Management System. This is done as England Rugby provide the catastrophic injury insurance for The Club. Other services may be used to record information.

If information is required to be shared with other organisations e.g. tournament organisers, it will be done so for those members taking part as long as the information required does not appear excessive or unwarranted. If so this will either be challenged or explicit permission sought.

Despite the nature of the club we do not hold data on any protected characteristics, except those given as part of the medical information. Should there ever be a need for this data, an anonymised collection exercise should be undertaken.

Membership of the Birmingham Bulls is no indication of sexuality.

Club Officers will need to be aware of the requirements of the Gender Recognition Act (2004)

Registration with Information Commissioner

The Club has self assessed as not needing to register with the Information Commissioner. We are currently exempt as a not for profit organisation. See Appendix 2 for terms of exemption.

Document Retention

Membership forms will be kept for 6 years following on from the latest date out of

- Date player trained with the club
- Date player played with the club
- Date player's membership terminated.

Data We Hold About You - Current and Past Members

The Club requests and holds the following data about its members. An overview of the use of the data is also given. There will be some other ways in which we may use this data detailed further on.

Basic Demographics

The following data is classed as the basic demographics, and will allow us to contact you with information about the club, or your membership. Supporters registered through Pitchero do not have to provide this information to The Club, but it is expected that members will do so to allow us to manage the club.

- Name
- Address
- Phone Number
- e-mail address
- Date of birth

NB Rugby players take a great amount of pride in representing their club, it is therefore accepted custom and practice that clubs publish the names of their team members.

The Club recognises that due to discrimination that still exists in society, some people may wish to keep their name private. In these instances the person can use a pseudonym on the public facing website, however their real name will still be stored. To request this please contact The Club Secretary

Emergency information

This information is only used in case of an emergency. The committee are able to view it, but should only do so in order to prepare next of kin lists for matches. Members may withhold information if they wish, but should be aware that this may adversely affect any treatment they receive in an emergency.

- Next of kin name
- Next of kin number
- Medical history
- Allergies

Membership Information

This information includes details of last date subs were paid, joining date, payment method, and any notes that are related to your membership.

How we store this data

The data will be stored on the membership database of the club site, Pitchero. Pitchero has it's own privacy policy which can be viewed [here](#).

This membership database can be accessed by the committee, and nominated individuals such as coaches or physiotherapy/first aid staff.

Additionally subsets of this information may be stored on

- The Club's google drive
- The Club's dropbox account
- Services that we use in order to run the business of the club e.g. newsletter or text messaging services.
- England Rugby's Game Management System.
- Mailchimp to send email newsletters.

Additional Uses

The Club seeks to be an active member of the sporting and LGBT communities. There may be times when we share a summary of our membership in order to inform planning, population profiling, or need analysis. This will be deemed to be appropriate use as part of our function as a sporting organisation.

The club will not sell or pass any data that could identify its members to other organisations.

Data We hold about you - Others

People who are not club members, but have expressed any interest in The Club may have their name and e-mail address added to our newsletter subscription list. This is hosted on Mailchimp, and allows an opt out to occur. After opting out your e-mail address is only stored to record this opt out information.

This information will only be used to keep people updated with what is happening in The Club and will not be used to specifically or majorly market a product or service.

Keeping Data Secure

Data will only be downloaded from the membership database in order to prepare next of kin details, data cleansing, or other exceptional circumstances. It will mainly be the club secretary that does this. Any data downloaded should be deleted when no longer needed.

Storage of records

Paper records should be kept in a secure location and protected from damage or destruction. They should not be conveyed unnecessarily and if so should not be left unsecured. When stored where other people may be present (either home or office) then consideration should be given to some form of locked storage.

System Access, Usernames, and Passwords

There are a number of different services that The Club uses. When there is any change in committee access to these should be reviewed and updated with passwords being changed.

Where possible committee members should have their own username and password for a service.

Passwords should be complex and of a suitable length.

Appendix 1 - Data Protection Principles

The Data Protection Act 1988 contains the following principles which must be adhered to

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –
 - (a) at least one of the conditions in Schedule 2 is met, and
 - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
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 purpose or 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 or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
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.

Appendix 2 – Terms of Exemption under The Data Protection Act

Your organisation was established for not-for-profit making purposes and does not make a profit. Or if it makes a profit for its own purposes, as long as the profit is not used to enrich others. You must:

- only process information necessary to establish or maintain membership or support;
- only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
- only share the information with people and organisations necessary to carry out the organisation's activities. Important - if individuals give you permission to share their information, this is OK (you can still answer 'yes'); and
- only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration.