ESMBA UK GDPR Guidance for Clubs and County Associations

Introduction

The English Short Mat Bowling Association (ESMBA) is committed to protecting the privacy and personal information of all members.

All clubs, county associations and affiliated organisations have both a legal and ethical responsibility to handle personal information appropriately.

In the United Kingdom, personal data is governed by the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

Personal data means any information that identifies, or could identify, a living individual, including:

- Name
- Postal address
- Telephone number
- Email address
- Date of birth
- Membership number
- Photographs where an individual can be identified
- Health or disability information
- Emergency contact details
- Online identifiers (such as IP addresses)

Organisations collecting personal information must ensure it is:

- Processed lawfully, fairly and transparently
- Collected for specified and legitimate purposes
- Limited to what is necessary
- Accurate and kept up to date
- Kept only for as long as necessary
- Stored securely
- Protected against unauthorised access or loss

Lawful Basis for Processing

Organisations must have a lawful basis for processing personal information.

For most bowls clubs and county associations , which are not for profit organisations, this will usually be:

- **Contract** – administering membership and competitions.
- **Legitimate Interests** – managing the organisation, communicating with members and administering the sport.
- **Legal Obligation** – complying with legal or regulatory requirements.
- **Vital Interests** – where necessary to protect someone's life or wellbeing, for example if they are unconscious and unable to respond to attending medical teams.
- **Consent** – where an individual has freely agreed to a specific use of their information.

Consent is generally **not required** for normal membership administration where another lawful basis applies.

However, consent should normally be obtained before:

- Publishing members' personal contact details.
- Using personal information for marketing or promotional purposes.
- Sharing personal information with third parties where there is no other lawful basis.
- Using photographs where consent is appropriate under the club's photography policy.

Consent should always be freely given, specific, informed and capable of being withdrawn.

Members' Rights

Individuals have rights under UK GDPR, including the right to:

- Know how their information is used.
- Access the personal information held about them.
- Request inaccurate information is corrected.
- Request deletion of information where appropriate.
- Object to certain processing.
- Restrict processing in certain circumstances.
- Complain to the Information Commissioner's Office (ICO) if they believe their information has been handled unlawfully.

Good Data Management

Clubs and County Associations should:

- Collect only the information they genuinely require.
- Explain clearly why information is collected.
- Keep information accurate and up to date.
- Store information securely, whether electronically or on paper.
- Limit access to those who need it.
- Delete or securely destroy information when it is no longer required.
- Report any significant personal data breaches in accordance with UK GDPR requirements.

Action Plan for Clubs and County Associations

Clubs and County Associations should:

1. Carry out regular reviews of the personal information they hold.
2. Record why personal information is collected and the lawful basis for processing.
3. Collect only information that is necessary for administering the club.
4. Ensure members receive a clear Privacy Notice explaining how their information is used.
5. Obtain consent where required (for example publishing contact details or photographs).
6. Use Blind Carbon Copy (BCC) when sending group emails unless members have agreed otherwise.
7. Keep passwords and electronic records secure.
8. Lock away paper records containing personal information.
9. Remove or securely archive information relating to former members in accordance with the club's retention policy.
10. Ensure parents or legal guardians receive communications on behalf of junior members where appropriate.
11. Ensure anyone handling personal information understands their responsibilities under UK GDPR.

Good Practice

Examples of good practice include:

- Holding members' postal addresses where required for membership administration.
- Communicating with members by email or telephone regarding club or county activities.

- Holding Members date of birth for accurate identification on a nationwide database, and to ensure correct eligibility for competitions.
- Holding emergency contact details where appropriate.
- Recording relevant medical information where necessary to protect the member during bowls activities.
- Holding DBS and safeguarding information only where appropriate and in accordance with safeguarding requirements.
- Reviewing records regularly to ensure information remains accurate.

Poor Practice

Examples of poor practice include:

- Keeping personal information that is no longer required.
- Sending communications unrelated to club or county business without consent where consent is required.
- Sharing membership lists with third parties without a lawful basis.
- Publishing members' contact details without permission.
- Failing to remove former members from mailing lists.
- Leaving personal information unsecured or accessible to unauthorised people.
- Holding excessive information that has no clear purpose.

Safeguarding Information

Safeguarding records should be treated as highly confidential.

Information relating to safeguarding concerns, DBS checks or disciplinary matters should only be shared on a strict need-to-know basis and in accordance with the ESMBA Safeguarding Policies, UK GDPR and the Data Protection Act 2018.

Further Information

Further guidance is available from:

- Information Commissioner's Office (ICO)
- ESMBA Privacy Notice
- ESMBA Data Protection Policy
- ESMBA Safeguarding Policies

Approved by ESMBA committee on 8th August 2026