



ENGLISH SHORT MAT BOWLING ASSOCIATION

WHY DATE OF BIRTH INFORMATION IS ESSENTIAL.

At the 2026 AGM in July, an oversight was identified: the ESMBA does not currently collect members' dates of birth. This matter was discussed, and it was agreed by those present that registration with the Association should, in future, include each member's date of birth.

Clubs and Counties are therefore asked to support this requirement by collecting members' dates of birth as part of the 2026/27 registration data.

For those who were unable to attend the AGM, and to help everyone understand the reasons for this requirement and answer any questions that may arise we have compiled from the authorities who oversee our sport and our Association, information which explains the legal basis and security surrounding the collection of this information.

In addition, a simple information poster has been produced which Clubs and Counties are encouraged to circulate to members.

INFORMATION COMMISSIONERS' OFFICE. (ICO)

The **ICO** is the **Information Commissioner's Office**, the UK's independent regulator responsible for upholding information rights and enforcing data protection law. Its role is to ensure organisations and Associations comply with legislation such as: UKGDPR and the Data Protection Act 2018

The ICO recognises that organisations may process personal data where it is necessary for a legitimate interest, provided there is no less intrusive way to achieve the purpose and the individual's rights are not overridden. Organisations must be able to demonstrate why the information is needed, ensure the processing is proportionate, and explain this clearly in their privacy information.

When relying on **Legitimate Interests** as the lawful basis for processing, the ICO advises organisations such as the ESMBA to consider three key questions:

1. Do we have a legitimate purpose?

Yes.

The **Purposes** include Safeguarding, accurate identification of members, preventing mistaken identity, responding to police and statutory agencies, and administering age-related competitions.

2. Is collecting the information necessary to achieve that purpose?

Yes.

The **Necessity** arises to prevent unnecessary intrusion caused by mistaken identity, as names alone are often insufficient where members share the same or similar names. Police, Probation Services and

safeguarding agencies routinely request us to check a person's **name**, date of birth and address to accurately identify the correct individual. Information will only be shared where there is a lawful basis or legal obligation to do so.

3. Does that purpose outweigh the individual's privacy impact?

Yes.

A date of birth is **personal data**, but it is **not special category data**. It is collected solely for legitimate membership, safeguarding and administrative purposes, stored securely, and accessed only by authorised officers when necessary.

Sport England is a public body sponsored by the UK Government through the Department for Culture, Media and Sport (DCMS). Its purpose is to invest in and promote sport and physical activity across England, helping more people become active regardless of age, background or ability.

One of its key roles is **Supporting National Governing Bodies (NGBs)**. For the ESMBA, Sport England is important because it influences many of the standards expected of recognised National Governing Bodies. Areas such as safeguarding, governance, equality, diversity and inclusion, and member welfare are all strongly supported by Sport England's policies.

Sport England makes clear that safeguarding is the responsibility of every governing body and that organisations must have appropriate systems and procedures to protect participants and work effectively with statutory agencies. Accurate membership records, including sufficient information to correctly identify individuals form an essential part of those safeguarding responsibilities.

The **Ann Craft Trust** (often abbreviated to **ACT**) is the UK's leading specialist safeguarding charity for **adults**.

Its mission is to help organisations protect adults who may be at risk of abuse, neglect or exploitation. It does this by providing expert guidance, training, research and support to organisations working with adults, including sports organisations, charities, local authorities and care providers.

The Ann Craft Trust's Safeguarding Adults in sport framework which Sport England signpost as best practice expects organisations to have effective safeguarding arrangements and information management.

The **Bowls Development Alliance** (BDA) is the organisation that brings together the National Governing Bodies (NGBs) of bowls in England to work collaboratively on the development of the sport. Its vision is to help more people enjoy bowls by supporting clubs, coaches, volunteers and governing bodies through shared initiatives and best practice.

The BDA's Safeguarding Manager, Craig Scott, has confirmed that "collecting members' dates of birth is an important safeguarding measure. It enables governing bodies to accurately identify individuals, supports safeguarding referrals to and from statutory agencies, and is lawful under UK GDPR where it is processed under **Article 6(1)(f) – Legitimate Interests**. This includes purposes such as age verification, safeguarding arrangements and competition eligibility, provided the information is used only where it is necessary and proportionate for safeguarding and other legitimate purposes."