

GDPR

Frequently asked questions (FAQ's)



ENGLAND
HOCKEY

NOTE: This will developed and expanded as further guidance becomes available. It should not be taken as individual legal advice.

Do I need consent for everything?

Guidance from the Information Commissioners Office, which is the agency set up to oversee data protection, is suggesting that consent should focus on the transfer of data and where you might be using data in ways that aren't essential to the running of the club. Where you are using their data in a way they would expect as a normal part of their club membership and any privacy concerns are minimal you can do so without specific additional consent. However it is good practice to set out to your members how you intend to use the data.

Can I still hold individual's data in spreadsheets?

Yes but beware. They allow data to be easily passed around in ways that might not be allowed and are often unsecure. They tend to sit on pc's long after they were needed and therefore the potential to breach GDPR is much higher than a secure, central system like Club Buzz, Pitchero, SportsLomo and Teamer.

What about Whatsapp groups and other means of communicating with members?

Whatsapp is just a method of communicating so the issue here is around what consent you have gained re communicating. If you are simply making routine messages to arrange teams etc then the guidance suggests additional consent is not required as long as the privacy concerns are minimal.

What are subject access requests?

An individual can request details of the data held about them. Subject access requests will need to be responded to within one calendar month rather than the current 40 calendar day period. It is also no longer possible to charge £10 for dealing with the request. They are often contentious. Individuals only make requests if they have something to complain about. Make sure you keep a log of how and when you respond and that you apply the exemptions from disclosure carefully.

Do I need to delete the data of ex-members?

Almost certainly yes. Unless you can demonstrate a good reason to keep it, the information should be securely deleted when they leave. Don't forget to delete old spreadsheets that might have been created over the years and are now no longer needed.

What about the club's social media accounts such as Facebook and Instagram?

This is a separate issue. Those services have to take their own steps to be GDPR compliant and deal directly with the individuals. However if you collect personal data for your own systems through them you need to treat it in the same GDPR compliant way that you would treat other personal data.