Telford Sailing Club Data Protection Policy

General Data Protection Regulation (GDPR)

Version 1.1: 20th Nov 2026.

Version Control

Version	Changes	Changes made by	Approved by / date
1.0	New Document	Manuel Greenwood	25/01/2025
1.1	Secure handling, use, storage, retention and disposal of DBS information	Manuel Greenwood	20/11/2026

1. About this Policy

1.1 This policy explains when and why we collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website telfordsailingclub.co.uk or our Club noticeboard regularly for any amendments (amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (https://ico.org.uk). For the purposes of the GDPR, Telford Sailing Club will be the "controller" of all personal data we hold about you.

2. Who are we?

2.1 We are Telford Sailing Club. Our postal address where we can be contacted is; 9 Springhill Road, Dawley, Telford, Shropshire, TF4 3DG and via our website telfordsailingclub.co.uk

3. What information we collect and why.

Type of Information	Purposes	Legal Basis for Processing
Member's name, address, telephone numbers, email address(es).	Managing the Member's membership of the Club. Managing the duty roster. The collection of appropriate fees	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of the Club	Performing the Club's contract with the Member.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
Gender	Provision of adequate facilities for members. Reporting information to the RYA.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
The Member's name, boat name and sail number	Managing race entries and race results. Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media. Allocating compound spaces.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club. For the purposes of our legitimate interests in promoting the Club. For the purposes of our legitimate interests in operating the Club
Photos and videos of members and their boats	Putting on the Club's website and social media pages and using in press releases.	Consent. We will seek the Member's consent on their membership application form and the Member may withdraw their consent at any time by contacting us by email or letter.
The Member's name and email address	Creating and managing the Club's Membership Directory.	We will seek the Member's consent on their membership application form and each membership renewal form. The

		Member may withdraw their consent at any time by contacting us by email or letter to tell us that they no longer wish their details to appear in the Membership Directory
Member's name and email address.	Passing to the RYA for the RYA to conduct surveys of members of the Club (and members of other clubs affiliated to the RYA). The surveys are for the benefit of the Clubs (and other clubs) and / or the benefit of the RYA.	For the purposes of our legitimate interests in operating the Club and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating
On occasion Telford Sailing Club will obtain and store medical data.	To ensure the safety of participants in sailing or other activities. The appointed organisers of these activities are responsible for the correct treatment of this data.	To protect the interests of the participant.
Vetting for Positions of Trust through the Disclosure and Barring Service.	To help assess applicants' suitability for positions of trust, Telford Sailing Club. Disclosure information will be reviewed by the welfare officer and the document references recorded. The DBS document itself will not be retained by the club. **Handling** In accordance with Section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information have been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it. **Usage** Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given. The Committee will determine if occasional helpers or the parents	For the purposes of our legitimate interests in operating the Club and protecting our members.

	of participating juniors require DBS checks.	

4. How we protect your personal data.

4.1 We will not transfer your personal data outside the EU without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the Internet this can never be guaranteed to be 100% secure.

4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However , we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer than need it.

7. Responsibility

Responsibility for data protection lies with the officer responsible for the activity.
As guidance responsibilities are as follows:

Membership: Membership Secretary
Data on Website: Webmaster
Payment and Financial Data: Treasurer
DBS and Child Welfare: Child Welfare Contact
Club Contacts can be found on our website here; telfordsailingclub.uk/committee

8. Your rights

8.1 You have rights under the GDPR:

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- to have your personal data transferred to yourself or to another business in certain circumstances.

8.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner: https://ico.org.uk/concerns Tel: 0303 123 1113.
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our postal address or email the commodore at commodore@telfordsailingclub.co.uk.

9. Secure handling, use, storage, retention and disposal of DBS information

9.1 Purpose and availability

Telford Sailing Club uses the Disclosure and Barring Service (DBS), through the RYA where applicable, to help assess suitability for eligible positions of trust. The Club will comply with the DBS Code of Practice, the Data Protection Act 2018, UK GDPR, and other applicable law when handling DBS certificates and certificate information. This section forms the Club's written policy on secure handling of DBS information. It will be provided to applicants when they are asked to complete a DBS application and will also be available on request.

9.2 Storage and access

DBS certificates and certificate information will be kept securely, either in lockable non-portable storage or within appropriately protected electronic systems. Electronic records must have strong access controls and be accessible only to authorised people who need them for their duties. They must not be kept in shared, unprotected folders or sent using insecure channels. The Child Welfare Contact is the officer responsible for DBS and child welfare information under section 7 of this policy, working with other specifically authorised role-holders where necessary.

9.3 Handling and disclosure

In accordance with section 124 of the Police Act 1997, certificate information must only be disclosed to people authorised to receive it in the course of their duties. The Club will keep a record of each person to whom certificate information is disclosed. Information will not be shared with other club members, instructors, committee members or third parties merely because they hold those positions. Any permitted sharing with the RYA or other authorised recipient must be secure and limited to what is necessary.

9.4 Use

DBS information will only be used for the specific purpose for which it was requested and for which the applicant has given appropriate consent, including deciding suitability for an eligible role. The information must not be used for unrelated membership, disciplinary or other purposes.

9.5 Retention

The Club's normal practice, as recorded in section 3 of this policy, is to review disclosure information and record the relevant document references without retaining the DBS certificate itself. If certificate information must exceptionally be held while a recruitment decision, dispute, complaint or safeguarding audit is completed, it will be retained only for as long as strictly necessary, normally no longer than six months after the decision unless a justified legal or regulatory reason requires otherwise. The Club will document any longer retention and seek DBS advice where required. Secure storage and restricted access will apply throughout.

9.6 Disposal and permitted administrative records

When no longer necessary, certificate information will be securely destroyed, for example by cross-cut shredding of paper or secure deletion of electronic files. It must not be placed in ordinary bins or insecure waste containers. The Club will not retain photocopies, scans, photographs, or other representations of DBS certificates or their contents. It may retain a limited administrative record of the applicant's name, the date of issue, the level/type of check, the role checked, the certificate reference number, and the decision taken, subject to the Club's retention and data protection requirements. This record must not reproduce conviction or caution details.

9.7 Responsibility and review

The Child Welfare Contact will oversee compliance with this section and ensure that people authorised to view DBS information understand their duties. Any suspected loss or unauthorised disclosure must be reported promptly under the Club's data protection procedures. This section will be reviewed alongside the Data Protection Policy and whenever relevant DBS or RYA guidance changes.