

2026 Issue 01

# Bourne End Junior Sports Club

## General Data Protection Policy



Matthew Todd

SPORTS HALL, NEW ROAD, BOURNE END, BUCKS, SL8 5BS

# BEJSC General Data Protection Regulations Policy

## Definitions

<b>CCBS</b>	Means Bourne End Junior Sports & Recreational Club (BEJSC), a registered charitable community benefit society (CCBS).
<b>GDPR</b>	Means the General Data Protection Regulations.
<b>Responsible Person</b>	Means Matthew Todd.
<b>Register of Systems</b>	Means a register of all systems or contexts in which personal data is processed by the CCBS.

## Policy & Privacy Statement

The Trustees of Bourne End Junior Sports Club are committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- ④ Processed lawfully, fairly and in a transparent manner in relation to individuals;
- ④ Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- ④ Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- ④ Accurate and, where necessary, kept up to date. Every reasonable step will be taken to ensure that any personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- ④ Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- ④ Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## General provisions

- ④ This policy applies to all personal data processed by the CCBS.
- ④ The Responsible Person shall take responsibility for the CCBS’s ongoing compliance with this policy.

- ⦿ This policy shall be reviewed at least annually.
- ⦿ The CCBS shall register with the Information Commissioner's Office as an organisation that processes personal data. Our registration number is Z4917935.

## Lawful, fair and transparent processing

- ⦿ To ensure its processing of data is lawful, fair and transparent, the CCBS shall maintain a Register of Systems.
- ⦿ The Register of Systems shall be reviewed at least annually.
- ⦿ Individuals have the right to access their personal data and any such requests made to the CCBS shall be dealt with in a timely manner and free of charge.

## Lawful purposes

- ⦿ All data processed by the CCBS must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- ⦿ The CCBS shall note the appropriate lawful basis in the Register of Systems.
- ⦿ Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data (our membership forms)
- ⦿ Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the CCBS's systems.

## Data minimisation

- ⦿ The CCBS shall ensure that any collected personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- ⦿ Personal Data will be collected via the annual BEJSC membership form (as attached to this policy), by completing a tournaments entry form or by signing up to receive information via the BEJSC website only.

## Accuracy

- ⦿ The CCBS shall take reasonable steps to ensure personal data is accurate.
- ⦿ Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- ⦿ Personal data records will be updated annually as per the data collected on the approved membership form.

## Archiving / removal

- ⦿ To ensure that personal data is kept for no longer than necessary, the CCBS shall put in place an archiving process for each area in which personal data is processed and review this annually.
- ⦿ The archiving process & periods of record keeping is as follows: -
  - Personal data (inc. health & medical notes) collected via membership form – 5 years
  - Personal data (inc. health & medical notes) collected via tournament entry form – 1 month post event

- iii. Awards received (Name & Award Received) – Indefinite
  - iv. Accident book record – 10 years
  - v. Child Protection Records – 15 years
- ⦿ When data is either deleted, destroyed or removed it shall be done in such a way as to be irrecoverable and a record of what was deleted, when it was deleted and who undertook the action will be kept.

## Security

- ⦿ The CCBS shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- ⦿ Access to personal data shall be limited to personnel who need access and appropriate security shall be in place to avoid unauthorised sharing of information.
- ⦿ When personal data is deleted this should be done safely such that the data is irrecoverable.
- ⦿ Appropriate back-up and disaster recovery solutions shall be in place.

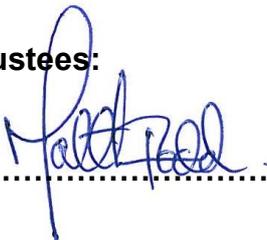
## Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the CCBS shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

**This policy was adopted on:** 9<sup>th</sup> April 2018 **(Date)**

**& Reviewed on:** 1<sup>st</sup> September 2025 **(Date)**

**On behalf of the Trustees:**

(Chairman).....  ..... **(Signed)**

**This policy will be reviewed annually by the Trustees**



# As stored on Website

## BEJSC Privacy Notice 2026

### About this notice

This notice (the “Privacy Notice”) provides information about how and why Bourne End Junior Sports & Recreational Club (BEJSC) Ltd (“we”, “us”, “our”, “BEJSC”) requests, processes, and retains your personal data. BEJSC is a Community Benefit Society registered under the Co-operative and Community Benefit Societies Act 2014, registration number RS009393.

BEJSC is required to comply with the legal requirements as set out in the Data Protection Act 2018 and are regulated by the Information Commissioner’s Office (ICO) under registration number Z4917935. The ICO provide guidance to firm’s on how to comply with the Act’s requirements.

BEJSC having its registered office at The Sports Hall, New Road, Bourne End, SL8 5BS, is the ‘controller’ of your personal data for the purposes of the Data Protection Act 2018. This means we are responsible for determining the purpose for which your personal data is used. Our staff and third-party service providers are ‘processors’ of your personal data. Should you have any questions or concerns about this Privacy Notice or the processing of personal data we hold about you, please contact us at Matthew Todd at [office@bejsc.co.uk](mailto:office@bejsc.co.uk).

### Our commitment

We are committed to respecting the confidentiality of the personal data you supply to us. Your personal data will be held securely and all data provided will be processed in accordance with this Privacy Notice and Data Protection Act 2018. We will never sell your personal data and you may opt out of marketing options by contacting [office@bejsc.co.uk](mailto:office@bejsc.co.uk)

### What is Personal Data

The terms ‘personal information’ or ‘personal data’ are interchangeable and means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, telephone number, email, ID, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## Lawful Basis

BEJSC may only process your personal data with a valid 'Lawful Basis'. There are six lawful bases for processing which are consent, contract, legal obligation, vital interests, public task, and legitimate interests.

BEJSC will process your personal data using the lawful bases of consent, contract, legal obligation, and legitimate interests. BEJSC will process and retain your personal data for specific 'purposes' which are aligned to the lawful bases, which are as follows.

Purpose	Activity	Lawful Basis
To become a member	To set up members on our systems to provide sporting activities.	Contract
To improve our website	To tailor our website with information which is appropriate and relevant for clients and prospective clients.	Contract
To administer legal rights	To establish, exercise or defend legal claims and provide proof, in the event of a dispute, of event or any communication.	Legitimate interest

## Personal data we collect

The data we collect will depend on our relationship with you, but in general the personal data we will require includes but not limited to the following and we collect your information either in writing, in person, via our website, by telephone, at events or through third party service providers.

- Personal Information such as name, date of birth, photographs, identification numbers
- Contact information such as email addresses, telephone numbers, postal addresses.
- Financial Information such as bank account details.

## Who we share information with

So that we may provide you with sporting activities relating to your membership we may share your personal data with third parties such as:

- Regulatory and Law enforcement bodies
- Sporting associations such as the English FA or Swim England
- Information technology firms in respect of storage for instance
- Third party service providers such as payment services for subscriptions

- Other similar clubs for events like tournaments

## Personal data security

We have put in place appropriate measures to safeguard the personal data we collect in connection with our sporting activities. In addition, we limit access to personal data to those employees, volunteers, contractors and other third parties who have a business need to receive and process your data. They will only process personal data on our instructions and are subject to a duty of confidentiality.

We maintain an incident response plan in the event of a physical or technical incident to handle this in a timely manner and limit any negative effect of such an incident. However, please note that although we take appropriate steps to protect personal data no device, computer system, transmission of data or wireless connection is completely secure and therefore we cannot guarantee the absolute security of your personal data.

## Your rights

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights in respect of your data.

If you do not agree with our use of your personal data as set out in this Privacy Notice, you should not submit your personal data to us. However, if you do not wish to submit your personal data, or if you wish to exercise your rights to prevent us using your data, you should be aware that we may not be able to do business with you.

Under the Data Protection laws, you have rights including:

Your right of access	You have the right to ask us for copies of your personal information.
Your right to rectification	You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
Your right to erasure	You have the right to ask us to erase your personal information in certain circumstances.
Your right to restriction of processing	You have the right to ask us to restrict the processing of your personal information in certain circumstances.
Your right to object to processing	You have the right to object to the processing of your personal information in certain circumstances.
Your right to data portability	You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any fee for exercising your rights. If you make a request, we will

aim to respond to you within 28 days. If your request is complex, we may take up to 3 calendar months to respond but in any event will keep you updated to manage your expectations.

## Retaining personal data

We will only retain your personal data for as long as necessary but are also required to retain personal data for specific time periods to fulfil regulatory obligations and will use the legal and legitimate lawful bases to retain personal data appropriately.

Your personal data will be retained on third party servers within the United Kingdom. However, there may be circumstances where your data will be retained in other jurisdictions due to reasons such as business continuity and disaster recovery.

## Cookies

Our website uses cookies and other methods to track your activity when visiting our website. We only use cookies in respect of your membership. This assists us in gaining a greater understanding of the way in which our website is used so that we may provide you with better experiences. No information which personally identifies you (other than as provided by you, such as signing up for our mailing list) will be collected by us through our website. Our website is hosted by an external provider, and we also use Google's analytics service, each have their own privacy policy. You may seek further information at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Transferring personal data

BEJSC will not routinely transfer your data to jurisdictions which do not have the same level of protections as the United Kingdom. Should we need to transfer your personal data outside of the above then we will ensure that the relevant jurisdiction has been assessed as having adequate and equivalent protection in place to ensure the transfer and retention is secure.

## Changes to our privacy notice

From time to time, we may amend our privacy notice of which the latest version will be available on our website. We will notify you and gain consent should we process your personal data for different purposes.

## Data privacy queries or complaints

If you have any questions or concerns about our use of your personal data, please contact Matthew Todd at BEJSC's who is responsible for Data Privacy / Data Protection. You may withdraw your consent for us to process your personal data any time.

Matthew Todd  
The Sports Hall  
New Road  
Bourne End  
SL8 5BS

Email: [office@bejsc.co.uk](mailto:office@bejsc.co.uk)

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's contact details follow.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: [www.ico.org.uk](http://www.ico.org.uk)

## APPENDIX

### Example Membership Form Data that will be captured

Welcome to BEJSC. This form must be completed by EVERY member of the club. If this is not done you will not be entitled to represent the club in any team or be able to use the club's facilities. Most importantly you will NOT be insured. The membership renewal is due each September, however only one membership fee is required per member irrespective of how many sections/sports you participate in.

PARTICIPANT'S FULL NAME (Sorry to repeat ourselves!)

ADDRESS

DATE OF BIRTH

IS PARTICIPANT WITHIN AGE BAND OF SECTION?

(circle one) Badminton - Ages 11 to 18 Basketball - Ages 6 to 12 Canoeing - Ages 8 to 18 Climbing - Ages 4 to 18 Swimming - Ages 4 to 18 Table Tennis - Ages 6 to 18

SCHOOL

DISABILITY / ILLNESS / MEDICAL / SPECIAL EDUCATIONAL NEEDS

EMERGENCY CONTACT NUMBER

ADDRESS

View all club policies, rules and code of conduct please visit <https://bejsc.co.uk/club-policies>

I have read and agree to the terms above

Gift Aid is reclaimed by Bourne End Junior Sports & Recreational Club from the tax you pay for the current tax year. Your address is needed to identify you as a current UK taxpayer. For every pound you give BEJSC gets an extra 25p from the Inland Revenue. This helps make your donation go further to provide the sport and recreation opportunities for children and young people in the area. For example, a gift of £10 can be turned into £ 12.50 and it won't cost you another penny! We claim it on the membership fee you pay for your child to join BEJSC so if you want your donation to go further, Gift Aid it! By completing the boxes below you are effectively signing, dating and declaring that you are a UK taxpayer and understand that if you pay less income tax and/or Capital Gains tax in a tax year than the amount claimed on all your donations in that tax year, it would be your responsibility to pay any difference. You can of course cancel this declaration at any time by writing to us and remember to let us know if you change your name or address whilst the declaration is in force.

Parent / Guardian Name Address (if different from above)

I want to Gift Aid my donation of £ 24.00 to BEJSC yes no

I want to Gift Aid my donation of £ 24.00 and any donations I make in the future or have made in the past 4 years yes no

I confirm (parent or guardian for those members under 16 are accepting on behalf of the child) that I am / wish to become a member of BEJSC and have agreed to the rules, policies and code of conduct for membership.

I understand that by submitting this form, I am consenting to our data being collected, stored and handled by BEJSC for the purposes set out in the BEJSC GDPR Collection and Uses of Data Summary, which can be viewed at <http://www.bejsc-football.co.uk/documents>. In line with the regulations any and

all of the consents you give below can be changed at any time simply by contacting us at [office@bejsc.co.uk](mailto:office@bejsc.co.uk).

If consent is not granted then you will only receive information solely about the members age group activity. BEJSC has adopted the Football Associations recommended guidelines on photography which can be viewed at <http://www.bejsc-football.co.uk/documents>

I want BEJSC to send me details of events, offers and opportunities yes no

I am happy to receive BEJSC club / section information by post, email, MMS, online or by phone yes no

I consent to the use of recorded images of me being used in club or section promotion yes no

I am happy for my achievements to be visible on the BEJSC website yes no