



# Information Sharing Agreement between the Croquet Association and its Member Clubs

## 1. Purpose of the Agreement

This document provides the basis for an agreement between The Croquet Association (CA) and its member clubs to share some personal details of club members. It has been written following advice from the Information Commissioner's office.

***Once the database being developed has been implemented, all playing members of CA Member Clubs will have the option, at no cost to themselves, to become members of the CA, the sport's governing body. To facilitate this, clubs must share information about those members with the CA.***

The primary benefit of sharing this data between the CA and clubs is that those members will be CA members and receive the benefits of CA membership as defined by the CA Council. It will also help to ensure that the clubs' subscriptions to the CA are accurately calculated on the basis of number of club members.

Secondly, when it has been developed, the CA is intending to offer an on-line database facility to member clubs which may be used by the clubs to maintain their own membership data. This information may include people who will not be members of the CA, and may also include data of interest to the club but not necessarily to the CA, as identified by the club.

## 2. CA Membership Purposes

### 2.1 Scope

This part of the agreement is limited to the data sharing between clubs and the CA to facilitate club members to become CA members. It does not cover any other kind of membership. The agreement covers the sharing of information between the CA and clubs that are identified as holding relevant information for the purposes of ensuring that accurate membership records are maintained.

Information will be personal in nature and may only be shared where ***a club member wishes to be a CA member.*** See Section 4 below about consent.

### 2.2 Purposes of Sharing Information

Under the terms of this agreement, information may be shared for the purpose of maintaining accurate membership records and enabling croquet club members to receive CA member benefits, which may include the following:

- Tournament Entry
- Maintenance of handicap data
- Maintenance of qualification (coaching/refereeing/handicapper) data
- Access to the Members' Area of the CA Website
- Inclusion in the secure online directory
- Access to the online Fixtures Book
- Access to the online Croquet Gazette

This is not an exhaustive list as new or changed member benefits and qualifications may be identified and these will be incorporated into this agreement during the monitoring and

review process.

## 2.3 Information Sharing Requirements

Purpose	Type of Information	Recipients	Data Controllers
Administer membership records; tournament entries; coach, referee, handicapper lists; notified availability for selection events	Specific member information, not anonymised	Club officials, CA staff and officials, relevant tournament managers, other members	Club Croquet Association

## 2.4 Information to be Shared

We require the following minimum set of data from the club for anyone who is or wishes to be a CA member:

- Name
- Address
- Handicaps
- For club members that have a primary club elsewhere, an indication that this is the case
- An indication of whether the member has consented to having their details visible in the CA Members directory:
  - To members of your or any croquet club of which they are a member
  - To all Members of the CA

In addition, for members who the club is claiming as students:

- Date of birth

Note that the CA will retain date of birth once known, even after the member ceases to have student status. It may also collect and hold date of birth directly from individuals for other purposes, such as qualifying for senior or veteran events.

The CA also asks clubs to provide the following:

- email address
- telephone numbers

This greatly helps the CA with communication to its members, and also increases the options available to them - for example members will not be able to log into the CA website without an email address and will therefore not access the electronic gazette and other information.

Other information which will be held by the CA where known:

- Skype Address
- Coaching Qualifications
- Referee Qualifications
- Handicapper Qualifications
- Croquet relevant special needs such as Colour Vision Deficiency

To complete the information provided, we will also need the number of playing members you have which do NOT have a primary club elsewhere, and who do NOT want their information shared with the CA. This then enables us to calculate the levy payable for the club's subscription.

## **2.5 Use of Information**

The information will be held by the CA in a database that is linked to the CA's website to facilitate:

- Accurate assessment of club subscriptions
- Tournament and coaching course entry
- Accessing secure membership area
- Accessing Croquet Gazettes
- Accessing CA Documents
- Use of the CA Directory (members only and in secure area)
- Members maintaining their own personal data including profile

## **2.6 Information Retention**

Information in the online database will be retained for as long as an individual member remains a member of the club or the CA. When an individual ceases to be a member then the record in the online database will be deleted except for the person's name, which may be retained for historical purposes. A copy of the record will be retained for historical and statistical purposes by the CA in an offline database and not used for any other purpose.

# **3 Handling Club Specific Data**

## **3.1 Scope**

This part of the agreement covers the use of CA Database facilities by clubs for their own purposes. The data to be held will be defined by and be the responsibility of the club concerned.

## **3.2 Use of Information**

All information held under this part of the agreement will be kept confidential between the club and CA officers. It will not be used by the CA except for statistical analysis, with any published results being strictly anonymised. It will be the club's responsibility to maintain the data, including removing any data no longer required. The Club is the Data Controller and the CA is the Data Processor.

# **4 Consent**

It is the club's responsibility to seek consent from their members to become members of the CA and hence to share and process information for the purposes identified. Visibility of their details in the online members directory is optional, and thus requires specific consent. Consent must be sought from club members by club secretaries. The EU General Data Protection Regulations, which will replace the Data Protection Act in May, 2018, require that each club member must explicitly have given their consent. Clubs will need to record when that consent was given and the form of words used. The Croquet Association, may, if required request to see this consent.

If a club member does not agree to becoming a CA member, the club should not send their details the CA and the club member will not benefit from being a CA member.

# **5 Data Access and Storage**

Data in transit is encrypted using Secure Sockets Layer (SSL). Stored personal data including backups and logs, except for the subject's name, is encrypted and the CA holds the keys.

A member's record may be accessed and altered by nominated and authorised CA club officers, CA staff and officials, and the CA member to ensure that records are accurate. Other CA members may also access data through the secure area of the website for information purposes only and cannot alter records. Examples of this include tournament managers, handicappers, club team captains, referees, and members looking for doubles partners. This list is not exhaustive but access must be limited to croquet-related matters and only through a secure login process. Members, clubs and the CA may not access the data to use it for any other purpose, which includes passing data to non-member third parties or selling data.

Club contacts details, limited to those which are relevant, are displayed on the CA website.

## **6 Data Transfer**

Data should be transferred electronically between clubs and the CA using the CA website. Clubs that cannot transfer data electronically should send the information on paper to the CA Office using Royal Mail. All information must be labelled with the originator - name of club and person supplying it - and dated.

## **7 Data Quality**

Clubs are responsible for ensuring that all data shared with the CA is accurate and limited only to the information required in this agreement. Clubs should have a process in place to ensure that data is checked for accuracy prior to sharing. Before sharing data, the responsible club officer will check that the information being shared is accurate and up to date to the best of their knowledge. Members whose details have been uploaded will also be able to access and change the data to ensure accuracy and reflect any changes in the data.

## **8 Data Protection Act**

Clubs must ensure that they comply with their own data protection policies where they exist. Clubs that have an exemption from registration with the ICO must still comply with the EU General Data Protection Regulation Act and ensure that they adhere to best data protection practice as outlined on the ICO website.

## **9 Review of This Agreement**

The CA will review and monitor this agreement every three years unless legislation or policy changes dictate otherwise.

New parties to this agreement may be included at any time, the formal arrangements for which will be managed by the CA.

Any proposed amendments or changes to this agreement will be notified to clubs.

## **10 Roles and Responsibilities**

In signing up to this agreement, the signatories agree to the following roles and responsibilities:

<b>Role</b>	<b>Responsibility</b>
Club Officer	Maintenance and transfer of accurate data
CA Staff and Officials	Maintenance and transfer of data, implementing security measures to protect data in online database.

