

Our Data Collection, Retention, Sharing and Privacy Policy v.1.1 March 2018

Our Purpose

Lee Valley Paddlesports Club Ltd is a Private Company Limited by Guarantee and without share capital. The registered Company Number is 8905366 and it has been registered in England and Wales. As we are the resident club for the Lee Valley White Water Centre, our registered address is Lee Valley White Water Centre, Station Road, Waltham Cross, Hertfordshire EN9 1AB.

Lee Valley Paddlesports Club Ltd is a community-focused club run by volunteers to promote participation in paddle sports and to provide paddle sports opportunities.

In fulfilling our aims and objectives we need to collect, retain, and in some cases, share personal data. We are an organisation that only processes data for a recreational purpose. This policy document describes the data we use, how we use it, and how we manage privacy.

Data Collection

We collect data from:

- Enquirers ~ who want to know about us, what we can provide as a Club or want to confirm how to join us.
- Applicants ~ who are joining our club and providing membership application information.
- Members ~ who are making enquiries; renewing their membership; ordering kit; engaging in specific club activities that require additional information or payments; involved as a member of our general committee, its sub-committees or any working groups; participating in activities that support the management of Lee Valley Paddlesports Club Ltd and the Club including administration, financial, training and disciplinary processes.
- Volunteers ~ who are supporting the activities of the Club either generally on an ongoing basis or for one-off events.
- Visitors ~ who are visiting our website (and for whom analytics are recorded) or are visiting our events and register data to engage in activities or receive communication from us, or for whom data is recorded so that we can provide statistical data to governing bodies or funding organisations.

We receive data via:

- Paper-based forms ~ for new memberships, membership renewals, events (including trips). Most of this data will be converted and held in digital format.
- Email ~ we have our own email server for leevalleypaddlesportsclub.org and any emails received by or sent by our Club email addresses are stored on the server to help us respond to messages in the carrying-out of our activities. If any member of our committee or a person approved as a volunteer needs to communicate with an Enquirer, Applicant, Member or other

Volunteer via their private email i.e. not a Club email address, they will first seek permission of the data owner to do so. If permission is refused, the data will not be used or held.

- We monitor emails sent to us, including file attachments, for viruses, malicious software, malicious intent. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. We will delete any emails we are suspicious of and may do so without reading any or all of the content they contain.
- Our website ~ www.leevalleypaddlesportsclub.org:
 - Our website is privately hosted to support the activities of Lee Valley Paddlesports Club Ltd and to provide means of communication between the Club, Enquirers, Applicants, Members and Volunteers.
 - Analytics ~ On our website we use analytics and web enhancement facilities provided by Jetpack, Wordpress. Jetpack is a plugin that connects our self-hosted WordPress website to WordPress.com's infrastructure to enable some WordPress.com features. To function, Jetpack may scan our website and compile aggregated anonymised statistics.
 - URL shortening ~ we use Bitly to shorten our website urls and make it easier to direct people to specific pages on our website. Bitly provides us with usage data on each link, but no traceability to individuals.
 - Membership and Renewal Forms ~ We have forms on our website to enable online membership and renewal application. The data entered is stored on our server and it is emailed to our club email server so that the application or renewal can be processed by our membership team and Treasurer. Copies of the membership list may be downloaded from the server to enable checks on membership to be carried out; reconciliation with the Club bank account; the keeping of a formatted list of registered paid-up members; and, the compilation of statistical returns.
 - Event forms ~ From time to time we publish events on our website and include forms for registering for the event. The data entered is stored on our server and it is emailed to our club email server so that the event registration can be processed by our event team(s) and any fees payable can be managed by our Treasurer.
 - Contact Us ~ Any person with access to our website can complete the contact form. The data contained (name, email address and message) is automatically sent to our email server and held until the matter is dealt with and up to 3 years thereafter in case there is any follow-up communication.
- Social media:
 - We have a public-facing Facebook page, a private members-only Facebook page, we use a Twitter account and an Instagram account.
 - We will not disclose personal information on external social media sites other than names and event information for which the event has a publicity/sharing disclaimer or for which we have prior approval of the data subject, and, unless we gain express permission to use more data than name and event identifier. An event identifier may be the date, venue and event time, an event class, or an event race number/bib number.
 - We receive messages via our public-facing Facebook page. We will use the data received to help us respond to the message and we will retain the message for up to a month in case the conversation is re-opened. We will delete all conversations we consider to be closed.
- Survey questionnaires

- From time to time we will run surveys of our members to help the Club develop.

Data Retention and Sharing

The Table in Appendix A lists data we hold, the purpose for which we hold it and, if it is shared, the reason for sharing. It is our objective to hold and share the minimum amount of data necessary in order to deliver our overall aims and objectives as a registered company and as a community-based, volunteer-based paddle sports club.

We retain data to:

- Hold a registered list of the members of Lee Valley Paddlesports Club Ltd as required by our Memorandum and Articles of Association and relevant provisions of the Companies Act.
- Manage our annual membership process and records.
- Communicate with our members regarding Club activities.
- Communicate with our members regarding their membership.
- Communicate with our members in the case of an emergency.
- Communicate with our members' Emergency Contact(s) in case of an emergency while the Club Member is engaged in a Club Activity.
- Run Club activities (for example using and maintaining rotas).
- Keep incident and injury records.
- Manage our income, receipts and payment processes, including the ordering and supply of club-related items for our members.
- Manage events for our members and for non-members.
- Provide statistical data to our governing bodies and funding bodies to promote paddle sports and paddle sport participation.
- Provide statistical data to British Canoeing to maintain our Affiliation and any certifications we may hold from time-to-time.
- Coaching and volunteer records for the maintenance of standards and safeguarding in accord with our national governing bodies, our Constitution and our Operating and Safety Procedures.
- Safeguarding records for the protection of our members, volunteers and visitors.
- Disciplinary records for the protection of our members, volunteers and visitors.

We share some personal data:

- The Directors and officers of the Club require access to data held by Lee Valley Paddlesports Club Ltd so they may discharge their functions.
- Our coaches and designated trip/event leads use data to enable them to fulfil their remit.
- The Lee Valley White Water Centre to link membership records so that the Centre (Vibrant Partnerships) can:
 - Collect participation income on our behalf.
 - Provide members discounts and privileges to our Club Members as members of the Resident Club.
 - Help us ensure that only Club members are enjoying member-only Club facilities.
 - Help us ensure that members are only accessing the water courses for which they have been assessed (by the Centre).

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- National governing bodies (for paddle sports) and those to whom they have delegated for the operation of competitions, events and courses, that require the Club to validate (with details) a Club Member's membership.
- Independent investigators or arbitrators ~ appointed by us or a national governing body to proceed on an incident, complaint or disciplinary matter.
- Emergency responders ~ may need data from our records to act effectively.
- Our insurers ~ we will not share information without the express consent of the data subject.
- Companies House: we may be required to provide a register of members under the provisions of the Companies Act.

We share aggregated anonymised statistical data:

- We may be required to supply aggregated anonymised statistical data to our governing bodies and funding bodies to promote paddle sports and paddle sport participation.
- In particular we share statistical data each year with British Canoeing to maintain our Affiliation and any certifications we may hold from time-to-time.

Privacy

We respect the privacy of our Club members, enquirers, applicants, volunteers and visitors. We will not share the data that we hold for any purpose other than stated in this policy unless we have the express permission of the individual to whom the data relates.

We will not share personal details amongst our members unless we have permission to do so. We do not require any member to participate in any of our social media channels, but should they choose to do so, their privacy is proportionate to the media they engage with.

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Appendix A

Data Item		Primary Use	Retention	Sharing
Membership and Renewals	Name	Identification for membership and communication.	Ten years in accord with Companies Act: register of members.	Management of the Club, membership, fee payments and activities; membership arrangements between LVPC and Lee Valley White Water Centre; email address book of members; Companies Act register of members if requested.
	Address	Identification for register of members (Companies Act); communication not possible by email or phone; family membership status.	Ten years in accord with Companies Act: register of members.	Companies Act register of members if requested.
	Phone	Emergency contact or contact where email is not suitable or is unavailable.	Duration of membership plus 2 years.	Directors and officers of the Club; designated coaches/event leads.
	Email address	Primary means of digital communication.	Duration of membership plus 2 years.	Directors and officers of the Club.
	Club membership number	For use on Club membership card and managing access to Club and Lee Valley White Water Centre activities and facilities.	Duration of membership plus 2 years.	Directors and officers of the Club; Lee Valley White Water Centre.
	Photo – linking details	For matching to and producing Club membership card.	Duration of membership plus 2 years.	Directors and officers of the Club.
	Emergency contact name	In case of emergency while participating in Club activities.	Duration of membership plus 2 years.	Directors and officers of the Club; designated coaches/event leads.
	Emergency contact number	In case of emergency while participating in Club activities.	Duration of membership plus 2 years.	Directors and officers of the Club; designated coaches/event leads.
	Medical conditions relevant to safe participation in paddle sports	For the planning of participation in Club activities, risk assessments and use in emergency situations.	Duration of membership plus 2 years.	Directors and officers of the Club; designated coaches/event leads.

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British Canoeing membership number and renewal date	For statistical returns to British Canoeing on the number of BC and non-BC members. As a minimum this is part of the annual Affiliation renewal.	Duration of membership plus 2 years.	Directors and officers of the Club. British Canoeing on queries relating to membership validity; aggregated statistical returns.
Lee Valley White Water Centre membership number and assessment level	To link Club membership to the membership records of the Centre so access to facilities and benefits can be provided and managed.	Duration of membership plus 2 years.	Directors and officers of the Club; Lee Valley White Water Centre.
Date of Birth	For determining membership categories; event participation eligibility; participation fees; safeguarding requirements; aggregated anonymised statistical returns.	Duration of membership plus 2 years.	Directors and officers of the Club; Lee Valley White Water Centre.
Gender	Safeguarding; participation criteria; diversity monitoring.	Duration of membership plus 2 years.	Directors and officers of the Club; aggregated anonymised statistical returns to national governing bodies and funding providers.
Nationality	Diversity monitoring.	Duration of membership plus 2 years.	Directors and officers of the Club; aggregated anonymised statistical returns to national governing bodies and funding providers.
Ethnicity	Diversity monitoring.	Duration of membership plus 2 years.	Directors and officers of the Club; aggregated anonymised statistical returns to national governing bodies and funding providers.
Disability	Safeguarding; activity planning; diversity monitoring.	Duration of membership plus 2 years.	Directors and officers of the Club; designated coaches/activity leads; aggregated anonymised statistical returns to national governing bodies and funding providers.
Acceptance of condition of membership	Membership record.	Duration of membership plus 2 years.	Directors and officers of the Club.
Acceptance of conditions for data collection, retention and sharing	Membership record.	Duration of membership plus 2 years.	Directors and officers of the Club.

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	Application date	Membership record.	Duration of membership plus 2 years.	Directors and officers of the Club.
	Membership date	Membership record; register of members (Companies Act).	Ten years in accord with Companies Act: register of members.	Companies Act register of members if requested; aggregated anonymised statistical returns to national governing bodies and funding providers.
	Class of membership	Membership record; register of members (Companies Act).	Ten years in accord with Companies Act: register of members.	Companies Act register of members if requested; aggregated anonymised statistical returns to national governing bodies and funding providers.
Accounting information	Name	Receipt or payment identifier on paper record, our online bank account operated by Barclays or our financial spreadsheet records.	For records held by the Club's Treasurer, Club year of the transaction plus 6 years.	Directors and officers of the Club; BACS information as part of the Club's Barclay's account; an independent auditor if used by the Club.
	Account number and/or reference number and payment value	Identifier and sum on paper record, our online bank account operated by Barclays or our financial spreadsheet records.	For records held by the Club's Treasurer, Club year of the transaction plus 6 years.	Directors and officers of the Club; BACS information as part of the Club's Barclay's account; an independent auditor if used by the Club.
	Cheque stub details	Identifier and sum written on to cheque book stubs.	For records held by the Club's Treasurer, Club year of the transaction plus 6 years.	Directors and officers of the Club; BACS information as part of the Club's Barclay's account; an independent auditor if used by the Club.
Coaching and Leadership	Name	Identifier for coaching and leadership records.	Duration of role plus 2 years.	Directors and officers of the Club. British Canoeing on queries relating to membership validity; aggregated anonymised statistical returns.
	Full contact details	Identifier for coaching and leadership records.	Duration of role plus 2 years.	Directors and officers of the Club. British Canoeing on queries relating to membership validity; aggregated anonymised statistical returns.
	Qualifications	Evidence and record of qualifications to be deployed as a coach/leader.	Duration of role plus 2 years.	Directors and officers of the Club. British Canoeing on queries relating to membership

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				validity; aggregated anonymised statistical returns.
DBS	The DBS record	Evidence and record to participate in activities requiring DBS clearance.	Duration of role plus 2 years.	Directors and officers of the Club. British Canoeing on queries relating to membership validity; aggregated anonymised statistical returns.
Rotas	Name	Identifier.	One year maximum.	Directors and officers of the Club and designated volunteers on the rota, or managing the rota.
	Contact details	For managing the rota.	One year maximum.	Directors and officers of the Club and designated volunteers on the rota, or managing the rota.
	Availability	For managing the rota.	One year maximum.	Directors and officers of the Club and designated volunteers on the rota, or managing the rota.
Events and trips	Name	Identifier.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.
	Full contact details	To contact on behalf of the participant in case of emergency.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.
	Emergency contact details	To contact on behalf of the participant in case of emergency.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.
	Medical information	To enable risk assessment; and, appropriate response in case of emergency.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.
	Paddle sport standard	To enable risk assessment and provision of appropriate activities and support.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.
	Special requirements (e.g. dietary)	To enable risk assessment and provision of suitable support.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.
	Sizing – for clothing and equipment	To enable provision of clothing and equipment if required.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.
	Payment details	To enable booking, payment and receipting processes.	Club year of event plus two years.	Directors and officers of the Club; designated coaches/activity leads.

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Incident and Injury Reports	Full contact details	Identifier.	Five years or as specified in the incident report.	Directors and officers of the Club; designated coaches/activity leads; venue staff (if applicable); medical responders.
	Full incident details	Details of the incident.	Five years or as specified in the incident report.	Directors and officers of the Club; designated coaches/activity leads; venue staff (if applicable); medical responders.
	Details as required by venue or national governing body	Additional details as required by different reporting procedures and requirements.	Five years or as specified in the incident report.	Directors and officers of the Club; designated coaches/activity leads; venue staff (if applicable); medical responders.
Safeguarding Records	Details as required by policies, procedures and national governing body recommendations	Details as required by safeguarding policies and good practices.	Five years or as specified in any specific record.	Directors and welfare officers of the Club.
Complaints Records	Details as required by policies, procedures and national governing body recommendations	Details as required by discipline policies and good practices.	Three years or as specified in any specific record.	Directors and officers of the Club; independent complaint investigators/arbitrators.
Discipline Records	Details as required by policies, procedures and national governing body recommendations	Details as required by discipline policies and good practices.	Five years or as specified in any specific record.	Directors and officers of the Club; independent investigators/arbitrators.
Website use	Analytic use data	Aggregated anonymised use data of the Club website and its traffic.	One year.	Directors and officers of the Club; online analysis and performance response by analytic tool providers.
Website contact form	Name	Identifier.	Club year plus two years.	Directors and officers of the Club.
	Email	To enable a response email to be sent.	Club year plus two years.	Directors and officers of the Club.
	Message	Details to be responded to; aggregated anonymised statistics on issues/interests.	Club year plus two years.	Directors and officers of the Club.
	Email date	Date/Time stamp added to the email.	Club year plus two years.	Directors and officers of the Club.

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