

Our Data Collection, Retention, Sharing and Privacy Policy v.4.0 March 2024

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 and for the benefit of our members. This policy document (The Policy) 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 who want to confirm how to join us and/or engage in our activities.
- 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 the Club's 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 safety, coaching, events management, 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.
- Contractors ~ who we are paying to provide support to the activities of the Club whether in the form of goods or services.
- Visitors ~ who are visiting our website (and for whom analytics are recorded) and social media sites, 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, registrations for participation, events (including trips). Most of this data will be converted and held in digital format.

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- Email ~ we have our own email server for leevalleypaddlesportsclub.org and we also use Gmail addresses for most roles on the General Committee. Any emails received by or sent by our Club email addresses are stored on the server or in Gmail accounts, to help us respond to messages in the carrying-out of our activities. If any member of our General 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.
 - 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 or Gmail accounts so that the event registration can be processed by our event team(s) and any fees payable can be managed by our Treasurer.
 - Questionnaires ~ we may host questionnaires through our website. The data entered is stored on our server and it is emailed to our club email server or Gmail accounts so that the questionnaire's administrator may collate and respond to the data.
 - 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 or Gmail accounts and held until the matter is dealt with and up to 3 years thereafter in case there is any follow-up communication.
- WebCollect ~ Lee Valley Paddlesports Club:
 - We use WebCollect as a cloud-based service to host our Membership, Club Night and Event booking, and fee payment system. WebCollect is designed for clubs such as ours, and enables us to tailor content to our needs.
 - Registration, Membership and Renewal Forms ~ We have forms on our WebCollect site to enable online membership and renewal application. The data entered is stored on WebCollect servers and new membership alerts (or updates) are emailed to our system administrators who, as Directors or Officers of the LVPC General Committee, manage the services on behalf of the members. Copies of the membership list may be downloaded from WebCollect to enable checks on membership to be carried out; reconciliation of the Club's finances; the keeping of a formatted list of registered paid-up members which is also used as our record of members to be kept as part of our obligations as a Limited

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- Company; and, the compilation of statistical returns for which anonymised information is compiled.
- Club Night and other Event Bookings ~ WebCollect is the service through which we are able to offer a booking and payment service to our members for each Club Night and for any other events that the Club operates should we need a booking and payments system. Bookings made by members attach to their membership record showing what has been booked, the fees payable and the fees paid. This information may be used by designated members of the LVPC General Committee or designated coaches to manage Club sessions, and the safety of those present.
 - Payments ~ Payments made for memberships, Club Nights and other events are processed through WebCollect and PayPal. In making a payment through these services, members are able to choose use of their personal PayPal accounts, or, use PayPal to enable use of their credit/debit cards. LVPC receives a WebCollect generated reference for any payments received and does not have access through WebCollect to members' PayPal account details or debit/credit card details.
 - SPOND ~ Lee Valley Paddlesports Club:
 - LVPC utilises the SPOND app for coordinating and communicating between Club coaches and safety teams; and, for those involved in events and trips. Names of participants and some contact or other personal information may be shared within the communications if necessary for liaison and coordination.
 - PayPal ~ Lee Valley Paddlesports Club Ltd:
 - LVPC operates a PayPal account to facilitate the receipt of online payments for the Club's memberships, Club Nights and other events, sales of any items.
 - Access to the PayPal account is restricted to the Directors and Treasurer of the Club. Payment information has limited personal information. LVPC receives a transaction ID and confirmation of the amount paid referenced to the member's name and email address. No details on the personal PayPal account or credit/debit cards associated with the Club member and used for the transaction are shared with LVPC.
 - Barclays Bank Account ~ Lee Valley Paddlesports Club Ltd:
 - LVPC operates a bank account for the receipt and payment of monies to enable the Club to operate. Accounts that include cash held at bank are produced annually for the Club AGM and submission to Companies House. No personal data is shared as part of this reporting.
 - Access to the details within the bank account is limited to the Directors and the Club Treasurer. The account and transaction statements from within the account show amounts paid against reference information provided by the person making the payment, and their account reference. Information on individual transactions is only shared between the Club's bank signatories and with the Membership Secretary in order to effectively manage Club finances, memberships and any queries from individuals regarding their own transactions – but only in respect of transactions personal to them.
 - 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

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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. Each survey will describe the purpose for which information is being collected and how it is to be used.
- Invoices, receipts and contracts
 - When we make commercial arrangements with 3rd parties, we are in possession of data they have shared with us, and we store this data as well as using some data items for accounting and payments and receipting.

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 Nights and 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, and services in support of Club activities.
- 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 Paddle UK 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 retain data in digital and hardcopy formats

Although our preferred primary media for the retention of data is digital, we also have need of hardcopy data retention in some instances, even if for a short period, in addition to a digital copy of the same data. We will manage both digital and hardcopy data retention according to the principles of handling it safely, only retaining the data for an identified purpose, and for the timescale that meets that purpose.

We destroy personal data at the end of its retention period

Both digital and hardcopy data that we retain will be destroyed in accordance with the retention schedule contained within this Policy, or sooner, if we determine no further purpose in holding that specific data. Where there is no specific requirement to hold data in hardcopy for a period equal to or longer than the digital format of that data, we will destroy the hardcopy as soon as we are able.

Destruction methods for hardcopy data include shredding and burning so that the personal data is no longer identifiable or shareable. Destruction methods for digital data include file and email deletion, deletion of backups and where practicable, data anonymising.

The General Committee of LVPC will coordinate an annual appraisal of data destruction requirements, and delegate actions for data destruction.

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 legal obligations and functions.
- Our coaches and designated trip/event leads use data to enable them to fulfil their remit.
- The Lee Valley White Water Centre, where necessary, so we can:
 - Access any benefits that may be available to our Club Members as members of the Resident Club.
 - Ensure that only Club members are enjoying member-only Club facilities and benefits.
 - Maintain safety standards for our Members and meet the Club's safety obligations.
- 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 services' 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 Paddle UK 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.

The responsibilities of LVPC Members and the General Committee

All members of Lee Valley Paddlesports Club have a responsibility to read and be aware of the implications for them and the Club of this Policy. Our new member and renewal processes ask you to confirm that this is one of the Club documents you have read and understand.

All members of LVPC have a responsibility to act in accordance with this Policy, and specific responsibilities apply to the members of the LVPC General Committee and those delegated by the Committee to lead or coordinate any of the Club's activities (on-water or off-water) including participation in sub-committees and working groups.

- a) The General Committee will have an annual item on an April meeting agenda to review The Policy's retention statements and to confirm actions on destruction of no longer required data.
- b) All new members of the General Committee will receive an induction on The Policy and their obligations that stem from it. The Chairperson will be responsible for arranging the induction, except where the Chairperson is new to post in which case the Directors of the Club are responsible for the induction.
- c) All members of the General Committee will have an exit debrief when they are leaving the Committee. This will cover the handover of any Club assets and data and/or the destruction of data, including email chains, where it does not need to be retained any further. The Chairperson will be responsible for arranging the exit debrief, except where the Chairperson is leaving the Committee, in which case the Directors of the Club are responsible for the exit debrief.
- d) If, for individual initiatives, events or trips, the information security needs are not explicitly met by the provisions within this Policy, all members of the General Committee or any sub-committee, working group, or event team that is operating on behalf of the Club, will be responsible for producing an Information Security Statement for each Club initiative, event or trip, for which personal data is to be gathered and retained for any period.

The Information Security Statement should state (i) The purpose for the Club having the data e.g. 'To safely run a coaching session', 'To organise and run a trip for Members', 'To run a Div 4 Slalom Race at LVWWC', 'To investigate the complaint report received from a member of the public', etc; (ii) A list of the personal data items to be gathered and retained; (iii) Where the data will be held; (iv) With whom the data will be shared; (v) The name of the person responsible for the disposal of the data.

The Information Security Statement should be lodged with the Chairperson and Secretary of the General Committee.

The compilation of such statements will facilitate the General Committee in monitoring data records and follow-through on destruction.

VERSION CONTROL:

The previous version was V3.0 dated April 2022

This Version is V4.0 dated March 2024 and updates British Canoeing references to Paddle UK; and adds SPOND as an app used by LVPC.

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; 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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	Paddle UK membership number and renewal date	For statistical returns to Paddle UK on the number of P.UK and non-P.UK members. As a minimum this is part of the annual Affiliation renewal.	Duration of membership plus 2 years.	Directors and Officers of the Club. Paddle UK 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;
	Date of Birth and/or Age Range	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; aggregated anonymised statistical returns to national governing bodies and funding providers.
	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.
	Vehicle Registration	Members' parking benefits at the Lee Valley White Water Centre.	Club Year of Membership.	Directors and Officers of the Club; Lee Valley White Water Centre and their designated Agent for the management of parking at the Centre.
	Acceptance of condition of membership	Membership record.	Duration of membership plus 2 years.	Directors and Officers of the Club.

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	Acceptance of conditions for data collection, retention and sharing	Membership record.	Duration of membership plus 2 years.	Directors and Officers of the Club.
	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, our online PayPal account, our WebCollect receipts and payments system, 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.
	Reference identity code, monetary value and email address	Identifier and sum on our online PayPal account 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; an independent auditor if used by the Club.
	Cheque stub details	Identifier and sum written on to our LVPC bank account 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.

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Coaching and Leadership	Name	Identifier for coaching and leadership records.	Duration of role plus 2 years.	Directors and Officers of the Club. Paddle UK 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. Paddle UK 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. Paddle UK on queries relating to membership 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. Paddle UK 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.

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	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.
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 designated 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.

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	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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