



Luctonians Sports Club Ltd & Luctonians Ltd

General Data Protection Regulations (GDPR) Policy in respect of: Websites, Social Media Platform the taking and storing of Images and Videography

Luctonians Sports Club Ltd and Luctonians Ltd (the Club) recognise that imagery of people, whether still photographs or in videos is personal information (data) and is subject to GDPR as much as any other form of personal information and that the same rights apply, as with any other form of personal data.

The Club also recognises that the use of websites and social media is a matter of day to day life and one that the Club embraces and acknowledges that in modern society such technology is an essential communications platform. The use of these technologies will of course involve some amount of personal data being used either in the form of written words or in the format of photographs or videography and a such will have to comply with GDPR.

The Club will use websites and the social media platform not only as an essential communications tool for Club members and the public as a whole to know what the club is about and what it has to offer, but also to celebrate the ethos and spirit of the sports we provide and the achievement of individual members, teams and the Club as whole.

The Club relies on Legitimate Interest as it lawful authority to collect personal data as detailed in the Legitimate Interest Assessment.

The use of Personal Data on Websites, Social Media Platforms and other digital technologies.

As with all data the Club needs to ensure that personal data that is used in such ways as described above is given the same protection as any other data where possible. It is recognised that when so using this data in electronic formats either on websites or social media platforms that once this data has been released it is in the public domain and hence not protected.

To balance this there is a strict code of conduct to be adhered to when putting members personal details into the public domain:

1. At the time of applying for membership, all members will be asked for permission to collect personal data in the format of photographs and videography.
2. At the time of applying for membership all members will be specifically asked for their consent to use some of their personal data across digital media platform to promote the Club, the ethos and spirit of their chosen sports and to celebrate any personal achievements either as an individual or as a team. Such examples would be the names of try scores in a match or the publication of a cricket score card. A photograph of the man of the match or other individual or team achievements.
3. As a general rule any imagery released into the public domain should be generic in nature and not necessarily single out any one individual.
4. The Club will not release any digital image or physical image that could be considered embarrassing or detrimental to any of its members, or goes against the ethos and spirit of the sports represented of the Club.
5. If there is any concern about imagery to be released about an individual specific permission will be sort at the time and the individuals wishes recorded.

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6. The exception to (5) above is in case of disciplinary matters or hearings where such personal details will be released to third parties involved in the discipline hearing. Likewise, such data will be released to law enforcement agencies upon receipt of lawful written request.
7. The above applies to all members but even greater care will be taken when considering the release of personal data that is related to a child or young person under the age of 18 years.
8. In respect of a child or young person all permission as detailed above will be sort from a parent or legal guardian.
9. When it is desired to release a specific individual photograph or video that focus solely on an identified or identifiable child or young person permission will be sort in advance of the taking or recording of such from a parent or legal guardian, as well as the child or young person themselves. An explanation of why such a photograph or video is required and how it will be used must be made in writing and the response to the request for permission recorded and then kept. The retention of such permissions so granted will be subject to the Club's Data Retention Policy.

The use of Websites, Social Media and other electronic platforms

The Club recognised that the use of Websites, Social Media and other electronic platforms are powerful tools to be used in the promotion of the Club, the sports it offers and the achievements of individuals, teams and the Club as a whole. The Club also acknowledges that these platforms are also powerful communications tools that are embedded in modern society as principle communications standards. The Club accepts that use of the electronic platforms are to be embraced and utilized to meet the requirements of its membership.

In order that such electronic platforms can be used safely and within the guidance of GDPR the following code of conduct will be followed.

1. Any website or social media pages or other electronic platform set up to represent Luctonians Sports Club Ltd, Luctonians Ltd (the Club) or purports to represent any activity undertaken by the Club must comply with these principles.
2. The use of any personal information on any such website, social media or any other electronic platform must confirm to the principles and code of conduct listed above in respect of Personal Data.
3. No content will be published that will cause any individual member, team or sport any embarrassment. The same applies to any competitors, teams, individuals or clubs.
4. No content will be published that is derisive, or calls into dispute, or damages the reputation of the Club, or any sports that it represents.
5. All functioning Social Media Page will grant access to a member of the Club so appointed to act as moderator. This person will have full administration rights and will have the authority to modify or delete any matter that they consider is not in keeping with this code of conduct.
6. Additional constraints for Social Media pages and other electronic platforms that content is specifically aimed at Children and Young or is focused on persons under the age of 16.
 - These pages or platform must comply with the above and must be closed to the public. Those who are invited to join must be either a member of the club that is participating in that age group and sport or a parent or guardian other the member so engaged or other family member with a legitimate interest to join.
 - All request to join must be vetted and established that they have a legitimate interest in joining and a verified relationship to one of the members who the pages is set up for.

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The use of Websites, Social Media and other electronic platforms continued

- Greater care must be taken when considering what personal data is published on the pages and imagery use must be of a general nature and not specifically of an individual unless the procedure above is carried out.
- The creator of the pages or person responsible for the running of the pages must have a current DBS check, have training in Safeguarding and Data Protection.

This policy should be read in conjunction with other Data Protection Policies of the Club.

Any question about this Policy should be directed to the Club's Data Protection Officer:
dpo@luctonians.co.uk

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