**MCBA AGM on Wednesday 23rd May 2018**

**Paper relating to Agenda Item 11: Implications of the General Data Protection Regulation (GDPR)**

On Friday 25th May 2018, the General Data Protection Regulation (GDPR) comes into force. This is an EU wide regulation that is being incorporated into UK law. Its purpose is to protect individuals’ data, held particularly in electronic form by companies and organisations, from misuse. Its purpose has been brought into sharp focus by recent scandals such as the Cambridge Analytica affair.

Whilst quite technical in some aspects, one of the main effects of the GDPR is to change the law on data protection from an OPT OUT law (i.e. we can continue to hold and use your data unless you tell us not to) to an OPT IN law (i.e. we can only hold and use your data if you give us written permission to do so).

This change has major implications for organisations such as MCBA which does indeed hold information on individuals such as email and actual addresses. In most cases we need to obtain written consent (either electronic or actual) from individuals before we can use any of their data and that includes, for example, putting photographs of winners of our events up on the website.

There are some exemptions from the “opt in” requirements, and one of these is “legitimate interests” of the organisation. However, these “legitimate interests” do not extend as far as you may think. We have been advised by the EBU that, for example, it would be legitimate interest to circulate to captains in any division of our league (but only the captains in that division) the name and contact details of the other captains, as it is otherwise impossible to run a league effectively. Similarly, we can contact MCBA members with details of our events and entry forms etc. However, we have equally been advised that it would not be legitimate interest to send emails to non-MCBA members advertising our events without prior written permission.

The GDPR also has several other requirements, including:

* a “privacy policy” which must be comprehensive in stating what data is collected, why, for what purposes, who has access to it, and how it can be deleted or amended on request from individuals
* the privacy policy must be publicly available
* a named person to deal with enquiries about individuals’ data

It is clear that this is an important issue for the County and, to that end, the Council meeting of 27th March 2018 agreed to set up a working group to look at the issues.

The working group consisted of Irene Davies, Karen Sandler, Alan Mould, and David Barton. The working party met on 10th April and have had extensive email correspondence since that time.

The working group, after taking extensive advice from the EBU, has:

1. Created a privacy policy. This is available on our website at <http://www.manchesterbridge.org.uk/2018Privacy-Policy.html>
2. Asked our webmaster (Rodney Lighton) to create @manchesterbridge.org.uk email addresses for all officers, so we do not have to use our own personal addresses. This will also make it easier when officers change. So, if you start to receive emails from addresses such as [secretary@manchesterbridge.org.uk](mailto:secretary@manchesterbridge.org.uk) these are genuine.
3. Created text to put on our flyers and entry forms asking people to opt in to receiving information about our events.
4. Created text for an email for officers to send to contacts asking them to Opt In to receiving information about our events
5. Created a pro-forma for people to sign so we can put up photos of them on our website etc. This will be available as necessary.
6. Checked through the handbook and are suggesting extensive alterations to it to remove a lot of unnecessary personal details.
7. Emailed clubs (affiliated and non-affiliated) and teachers to confirm that they wish to remain in the handbook and on the website.
8. Emailed affiliated clubs offering support on this issue (as it affects clubs as well).

The County believes it is on top of everything that needs to be done, but the changes will affect all of us and will affect our working practices in MCBA.

It will mean work for a number of officers over the next few months, particularly those involved in publicising and running our events, but after that hopefully things should settle down.

As members, if you receive emails from officers asking you to confirm you wish to receive information from the County, please do so, as otherwise we may not be able to continue sending you certain information. Ignoring such emails is equivalent to saying “no”, not to saying “yes”.