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To: The General Secretary of every Local League  
Contacts of all Premier Clubs

### **The ETTA, Sport England, Individual Registration and the Data Protection Act**

#### **Introduction**

The ETTA distributed Individual Registration Forms to Affiliated Leagues and Premier Clubs in September 2005, in paper and electronic form to Leagues and paper form to Clubs. The League form was similar in content to forms that have been sent out in previous years. The Club form contained the same basic information with the addition of an 'Activity Survey' section.

Many Leagues and clubs have already returned the forms in either paper or electronic versions to the ETTA. Others are not sure why the information is necessary and a few have raised concerns about the gathering and use of the information.

These '**Frequently Asked Questions**' seek to explain the reasons behind Individual Registration and to answer the queries that have been raised.

#### **What is Individual Registration and why is it needed?**

There are two main reasons for Individual Registration.

Firstly the current ETTA system of affiliation is principally based on League teams; there is no direct connection between the individual league player and the ETTA. This makes communication from the ETTA to its members and vice versa difficult, relying on the over worked and often under appreciated League or Club Secretary to circulate and co-ordinate information. There would be significant advantages if a system of direct communication between the ETTA and its members could be established.

Secondly the ETTA receives substantial funding support from Sport England to help it to administer and develop the sport through the 'Whole Sport Plan'. In return the ETTA has to report on progress in several areas, including level of participation of players, coaches and volunteers.

ETTA Rules have contained provision for the creation of a database of 'Affiliated Persons' for a number of years (rule 58) and forms have been circulated to Leagues in previous years. To stimulate more direct communication the ETTA AGM in 2005 agreed to the principle of Individual Registration and a major update of the database was initiated.

#### **Why have I been sent an Individual Registration Form?**

As a first step to the creation of a new database the ETTA has distributed Individual Registration forms to Leagues and Premier Clubs.

### **Why are there two different forms?**

The nature and detail of the information required has been developed by the ETTA in conjunction with Sport England. At the time that forms were sent to Leagues the final detail of the information relating to the Activity Survey and how it was to be collected had not been agreed. At the time that the forms were sent to PremierClubs the Activity Survey element had been agreed and was therefore included on the Club form.

### **Why were the forms sent out after Leagues and Clubs had sent out their registration/membership forms?**

The forms were sent out as part of the annual cycle of communication with Leagues and Clubs, when Leagues have to send their affiliation information and when PremierClubs have their annual assessment and renew their registration.

The ETTA is working to integrate the collection of Individual Registration information with League registration and Club membership, so that information has to be given only once each year by each individual.

Individual registration forms and databases will in future be distributed in the Spring to enable leagues and Clubs to include the information required by the ETTA on their own registration/membership forms. The ETTA has produced a membership template for PremierClubs in the past, this will be updated and also made available to leagues to assist in gathering information. In the future it is hoped that individuals (or leagues or clubs as appropriate) will receive a copy of their information from the previous year so that any changes can be incorporated rather than a blank form having to be filled out.

### **Why does the ETTA need all this information?**

The information is required for two distinct but related purposes. To facilitate direct communication (and to help take a burden off League and Club secretaries) and to enable the ETTA to track trends in participation in the sport and report them to Sport England in relation to the Government's drive to increase physical activity and promote healthy lifestyles. The content of the Registration forms is a combination of the information needed for these two purposes.

### **What will the ETTA do with the information?**

The ETTA will store the information on a central database and will be used for the purposes stated – communication with individuals and reporting on trends in participation. Each form contains opt out options for receipt of other information (the A,B and C questions), the ETTA does and will respect these opt outs.

The ETTA is working to establish a single database to cover all aspects of its operation, with one entry per individual. This new database will avoid the duplication of information currently gathered from licensed players, coaches, umpires, referees etcetera and should avoid the need for an individual to complete more than one form.

### **Is the use of the information legal under the Data Protection Act?**

The ETTA takes its responsibilities under the Data Protection Act seriously and monitors and reviews its systems to ensure compliance. The gathering, processing and use of this information is legal under the ETTAs Data Protection Register entry.

The ETTA takes care to keep information secure as required by the Act and information used to report to outside organisations on trends in participation is not personal data. It is not identifiable with the individual – it consists of information on age, gender, ethnicity, disability and areas of social deprivation (mapped by post code).

**Do Leagues and Clubs lose their exemption under the Data Protection Act and need to register if they pass the information onto the ETTA?**

Leagues and Clubs do not lose their exemption to registration if they return Individual Registration data to the ETTA in either paper form or in electronic forms from information received from their members for that purpose. Leagues and Clubs are classified as 'Data Processors' acting on behalf of and under the instruction of the ETTA as 'Data Controller'.

Leagues and Clubs are also able to carry out their functions in relation to data collection and processing from their members without being required to register under the Act.

Some Leagues and Clubs may have used information gathered from their members prior to distribution of the Individual Registration forms, without seeking additional consent from individuals. However the basis of affiliation to the ETTA is via Leagues and Clubs and those joining a League or Club know they are also affiliating to the ETTA. Consent for personal data to be processed can therefore be implied from joining a League or Club.

The ETTA intends to provide Data Protection Act guidelines to Leagues and Clubs, in conjunction with distribution of details of data collection for 2006/2007, to demonstrate to them best practice in the gathering and processing of membership information.

Information on the DPA, including details of the ETTA's entry on the Register of Data Controllers, can be found on the website of the Information Commissioner at [www.ico.gov.uk](http://www.ico.gov.uk)

**Why do I need to give my date of birth? Why not use age-range tick boxes instead?**

It might seem simpler to use tick boxes for age ranges that reflect age categories in Table Tennis. However the age categories for reporting on participation in sport are different to those for Table Tennis and reporting has to be done at different times of the year. A tick box system is therefore impractical.

Your date of birth does not change, it only has to be given once and does not need to be updated each year. However age ranges may change in the future and whenever reporting is needed date of birth allows this to be done.

**Should there be special provisions for young people?**

**What happened to the database that PremierClubs were promised?**

The intention was to issue a database that covered the information on the PremierClub form to Clubs as they registered for the 2005/2006 year. Unfortunately the information to be collected has been under further review by Sport England and it was decided to concentrate on providing accurate information well in advance of the 2006/2007 year.

**Conclusion**

The Individual Registration forms distributed this year are an important first step in establishing better communication within the Table Tennis world and in enabling the ETTA to demonstrate the benefits of Table Tennis.

The more complete the picture the better and the ETTA therefore asks all Leagues and Clubs that have not yet done so to distribute the forms to their members and return completed forms to the ETTA as soon as possible.

Alex Murdoch  
ETTA Chairman