

Briefing and practical advice for golf club administrators

### **Outsourcing your accountancy**

**Jerry Kilby** of the Kanda Golf consultancy looks into the various potential benefits to some golf clubs of outsourcing their accountancy requirements, with feedback from managers who have already gone down this alternative route.

t is certain that with technological advances and better access to high-speed broadband across the country, more golf clubs are considering a move to fully outsourcing the management of their finances, and many have already made the move.

Golf clubs have historically recruited a bookkeeper to diligently maintain the club's financial records, and then, together with the club's secretary/manager, produce monthly management accounts for the club's committee or owners. They have also engaged the services of a local accountancy firm to undertake the quarterly VAT returns and production of annual accounts. But is this traditional way of looking after your finances still the best way?

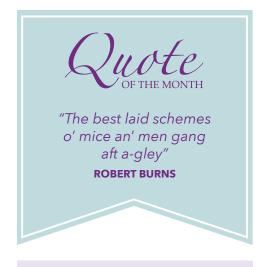
In many clubs, members with accounting experience may be undertaking this work voluntarily. This may save the club money, but it can cause real problems for the club when that willing volunteer decides to move on. In a members' club, it will also be important for members to oversee and be able to scrutinise the club's finances, but should one their number be undertaking the role of bookkeeper? The general view is that volunteer bookkeepers are only needed when the club cannot afford to engage a qualified person for this important task.

Technology now allows small businesses to operate remotely, and by doing this, there will be a reduction in the amount of paperwork going through the club's office and a reduction in the number of man-hours dedicated to the administration of finances. The club can still maintain transparency, accountability and compliance with all tax and company trading requirements.

At the time of writing, a dozen golf clubs are using the services of Hampshire-based *Accountancy Matters*, a company that provides a specialist accountancy outsourcing service to independent golf clubs. Paul Mould, director of the company, started the business two and half years ago, and he believes this combination of technology and centralised expertise is a logical step for many golf clubs, as the costs of recruiting full- or part-time staff to undertake the work required becomes an increasing burden on a golf club's finances, with committees rightly scrutinising every line of cost.

"We have a team of chartered accountants and bookkeepers looking after our twelve golf club clients," Mould explains. "We provide a cost-effective and professional service that has saved our clients' money and delivered a more efficient financial management service.

"We use the cloud-based accounting software called *Xero* and this allows us to manage the club's finances remotely, but will also allow the club manager



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Grass Clippings: The challenges of autumn 2020 and/or club treasurer to access the accounts from wherever they are, at any time. We use Xero in conjunction with an online purchase order management system (which ensures that only those who have purchasing authority at the club can place orders) and secure document storage system. The work that someone at the club has to do on site is minimal."

The managers who have made the move to Accountancy Matters are very pleased with the service. Chris Lomas CCM, secretary at Worplesdon Golf Club in Surrey, was the first to use this service in 2018, and there is no going back. "The outstanding advantage has been the ongoing savings for the club," Lomas says. "However, the consistency of reporting, without the worry of employment issues, including sickness or holidays, has also been a great benefit. We have, without question, improved efficiency. Having someone working with you who also does the same for other clubs is of great benefit. It also allows us to combine the best practices of all of the clubs under the Accountancy Matters umbrella to make us as efficient as we can be."

Another client, Ben Beagley, general manager of Farnham Golf Club in Surrey, is also a fan: "The quality and consistency of the work undertaken by our outsourced provider is excellent. We're delighted that we made the move. Accountancy Matters has made excellent improvements to our systems and procedures. Everything runs like clockwork. Recently they have been extremely helpful in the handling of furlough scheme claims.

"We know exactly when we will receive the monthly information after month end. It is delivered accurately and on time, so we can schedule our management accounts review meetings accordingly and share the appropriate information with heads of departments in a timely manner. Here at Farnham Golf Club we have not experienced any downsides."

But outsourcing the management of a golf club's finances is not right for every golf club. Many of the larger golf clubs, with higher turnover and more complex finances, will clearly justify the investment in employing one or more bookkeepers or accountants on a full- or part-time basis. At the other end of the scale, smaller clubs with lower turnover may well need to use volunteers to manage the club's finances, as the costs of engaging a company or employing even part-time personnel may not be feasible.

Graham Johnson, head of finance at Accountancy Matters, believes that working for a number of golf clubs allows them to share best practice with clients, saving the club time. It also provides a resource five days a week to the club and ensures continuity of service throughout the year, even when a staff member is on annual leave or off sick.

"We have managed to provide golf clubs with a service when the member of staff looking after the accounts has resigned or left suddenly," Johnson explains. "Or, when a golf club committee requires more detailed financial reporting, which the existing team member or existing software is unable to provide.

"We currently employ three chartered accountants and a number of full-time and part-time bookkeepers, and are recruiting at the moment to enable us to expand the portfolio of golf club clients on our books."

For more information about Accountancy Matters and the services it can provide, log on to https://amglltd.com/. To contact the company, call 01252 628142 or email paul@amglltd.com

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# ON COURSE



## The time for change is now! Part II



Last month, Alistair Beggs, Head of Agronomy, The R&A, set the scene about the challenges golf is likely to face over the next 50 years as a result of climate change, the availability of resources and changing legislation. This month, he highlights how best to evaluate the various threats at your club using a risk matrix before deciding on the best courses of action to consider or implement.

### Risk matrix

There are two considerations when assembling a risk matrix. First, we must consider the likelihood of an occurrence, which could be measured between 1 (remote) and 5 (very likely). Then we must consider the severity of that occurrence, which

could be measured between 1 (incidental) and 5 (catastrophic). This matrix is shown in Table 1.

Table 1. Risk matrix

Likelihood of occurrence	Severity of occurrence
1 - remote	1 - incidental - no immediate impact on course quality
2 - unlikely	2 - minor impact on course quality
3 - possible	3 - moderate impact on course quality
4 - likely	4 - serious impact on course quality
5 - very likely	5 - catastrophic impact on course quality



These characteristics are then multiplied together for each threat and given a score. These scores are then added together to provide an overall total score. The score in each of the six categories (a-f in Table 2), identified in Part I in October's GCS Newsletter, is added up to give a total score. In general terms, the higher the score, the greater the risk. However, in order to highlight high-risk areas, the score should have a letter suffix or suffices, with any high-risk area(s) appearing as a letter after the score e.g. 75ef. An example of how this scoring might be presented is shown in Table 2.

Table 2. Risk scoring

Threat	Risk Score (likelihood x severity)
Tilleat	Risk Score (likelihood x severity)
a. Coastal flooding	8
b. Conventional flooding	8
c. Drought damage	9
d. Pest damage	10
e. Disease damage	15
f. Aggregate shortage	25
Total Score	75ef

Once this exercise has been completed, each perceived threat can be categorised as either a low, medium or high risk and plans made on action to be taken and how often this process should be reviewed (see Table 3).

Table 3. Risk bands and review

Risk Band (per category)			
Low Risk (Score 1 - 8)	Medium Risk (Score 9 - 12)	High Risk (Score 15 - 25)	
Regular review to maintain status	Adopt practicable controls in weaker areas where possible and review	Explore new strategies and practicable controls focusing on vulnerabilities to reduce risk where possible and review	

#### Threat management

Once clubs have a reasonable idea of their vulnerability to the main threats, consideration can be given to their mitigation. None of these threats is easy to resolve but having an awareness of your own priorities and then talking about them, first internally and then with external bodies, is a good first step.

Part of the Golf Course 2030 (GC2030) process is designed to generate insight into best practice solutions across all the

aforementioned threat areas, but there is no getting away from the fact that clubs will have to invest in new technologies to help protect themselves if they are to thrive as businesses in the longer term.

Vulnerability to coastal and conventional flooding will depend largely on location, but for low-lying links courses and those located on flood plains and poorer low-lying soils, long-term solutions are likely to be very expensive, if they are practicable at all. Options to erect defence systems or relocate to adjacent land may exist for some. For others, persistent flooding may be solved by investing in more modern drainage systems and on-site water storage, which could require loss of holes if it is to be accommodated. In themselves, some of the solutions may be disruptive and expensive but such investment must be considered over the long term, and if they can guarantee a future for the site, then the investment may be considered worthwhile. As with many technologies, solutions may become more affordable over time, and implementing known best practice and cheaper - if only partial - solutions could provide enough breathing space for those managing on smaller budgets.

Access to water is likely to become more challenging in the years ahead. A reliance on mains water is going to become increasingly expensive and will be subject to rationing when droughts hit. Golf courses tend to be well down the priority list for water when there is insufficient to go round. Clubs should be encouraged to explore self-sufficiency if possible. Methods for harvesting, storing and attenuating water are becoming more innovative and more affordable and should be high on the priority list for all clubs which have a known vulnerability in this area.

Also, irrigation systems are becoming more efficient and less wasteful of water. Investment in modern pumps and sprinkler heads will keep water use to a minimum, while wetting agent programmes have been proven to cut irrigation demands by up to 40%. All these options should be considered.

The effective management of pest and disease damage is going to require a different strategy from that which we have been used to since WWII. Modern legislative measures are only moving one way and the revocation of pesticides that pose a threat to human and environmental health must be supported. However, until alternative strategies prove themselves, many greenkeepers are scratching their heads about what to do and are seeing much of their hard work over many decades destroyed, in some cases in a matter of weeks! Disease control now requires a preventative approach, so understanding the vulnerability of your turf is essential if day-to-day practices are to be adopted that will minimise the threat of damaging outbreaks.

It is no use hoping the inevitable will not happen. It is equally important that end users (i.e. golfers) understand and appreciate that the techniques which remain may not be as effective as the chemical ones which have been lost. Medium-term turf quality may not be as good. The hope is that new solutions will come along, but the biological revolution currently underway is hampered by our limited knowledge of how our actions affect soil microbiology. Our understanding of how to get the best out of such products will probably be driven by agriculture in the medium term, and we should not be afraid of looking beyond golf and wider sport applications for potential sustainable solutions.

Similar problems are being encountered when it comes to pests. Control of leatherjackets, chafer grubs and casting worms is now much more difficult than it was only five years ago, and damage to UK courses is real and problematic. Alternative, safer solutions are slowly emerging, but like modern-day disease control, the efficacy is not as good, the expense is higher, and the deployment of products/techniques, where available, is more challenging and long-term in its impact. There is some hope in the form of 'safer' insecticides, but licensing is still to be agreed, and such materials are only likely to provide short- to medium-term relief if they become available at all.

Finally, there is the issue of aggregate shortage. This is something that is becoming manifest in prices of sands and aggregates now, and this, together with ever-increasing haulage costs, is making the purchase of these materials in the volumes required to make a difference to playing surfaces ever more challenging. Sands are crucial for offsetting natural processes associated with grass growth such as organic matter build-up, and are essential for maintaining good drainage and for filling bunkers. What does the future hold in this area? Perhaps the industry will have to rely on lower specification materials, or perhaps alternative sources or replacement materials will become available. At the very least, using what we have more ingeniously and more sparingly is good practice, and maybe the transfer of the sand bunkers from the original links to lesssuited, heavier-soiled inland sites may not prove to be the great idea originally thought? Could the introduction of alternatives, using natural site featuring, possibly be the way forward?

It is time for reflection and action. Golf course construction, management and the optimisation of playing surface quality may well have a very different look in the future to the one we are used to. It is important for clubs and golfers to recognise this, identify weaknesses and start acting to mitigate them.

We all react to challenges. Some face up to them, others ignore them. All of the above reflects on the sustainability of our sport and it is important for all of its stakeholders, including golfers, to become more aware of sustainability as it relates to golf. The R&A considers sustainability to be a key priority for golf and an important element of the sport's contribution to wider society and the effect the game has on nature and resources. We believe that sustainability will be delivered by enduring businesses, which provide a positive sporting, environmental and social legacy for future generations. The R&A strongly advocates sustainability and considers sustainable golf operations (be that a new development, existing facility or golf tournament) to be ones that protect nature, benefit communities and conserve resources.

Sustainability for golf is relevant to where we play and what we play on. Golf and golf facilities can also offer much to people who don't play the sport. Building and managing the courses on which we play golf, and on which we host golf tournaments, impacts on nature, communities and resources. Everyone involved in golf should do their best to ensure that these are positive impacts, while at the same time providing a great golf experience.

Let's leave the last word to Rory McIlroy, who said this recently: "Building (and maintaining) these golf courses on these massive pieces of land, having to use so much water, so much fertiliser, pesticides, all the stuff that we really shouldn't be doing nowadays, especially in the climate we live in... I think golf has a responsibility to minimise its footprint as much as it possibly can."

### The joys of the job

**Alan Davey**, retired managing secretary of Pyecombe Golf Club in Sussex, reflects on the challenges facing his colleagues still in office this year, and some of the 'highlights' from his time behind the desk.

was asked the other day whether or not I was enjoying retirement; well, that one was easy.



The stag won this particular stand-off at Pyecombe

There was another question: "Did you ever have anything as difficult to deal with as COVID-19?" That one was even easier - categorically, no.

Events over the past year have required tremendous commitment and ever-increasing workloads for managers and committees to keep clubs safe and compliant while maintaining their businesses, which is clearly an understatement! Long-established policies and procedures have had to be thrown out of the window. To what degree, and how soon clubs' working procedures return to some sort of normality is uncertain. If there are any positives, it has left many clubs with a resurgence in interest and membership, a huge desire from golfers to get out and play and, for many, a new-found appreciation of what had for some time been taken for granted. For many clubs, the support from the membership during the difficult times has really cemented an appreciation of their members.

COVID might also be a catalyst for change and innovation, sparking a review of some well-established traditions. Club diaries, patterns of play, and decision-making processes often existed because 'it has always been done like that'. I am sure that many clubs staunched in tradition over 'roll-ups' have had their hand forced into specific tee-times. This has led to overpolarised views that many traditional members lament the loss

of their roll-ups, while some managers have been delighted to see the end of 'mob' mentality among certain large groups! Is that true? Many clubs have lost their 'traditional' ladies' morning and seniors' roll-up, again with mixed reaction.

New initiatives will be tried. Some will succeed, some may not. Patterns of behaviour, changes in income streams and changes in expenditure will challenge managers in ever more diverse ways. It led me to ruminate over some of the more challenging experiences during my time as a golf club manager - small fry, I guess, compared to the current climate.

I suppose I had received a good grounding in my teaching career. Management and leadership are intertwined and thinking on your feet is a management skill, whether in golf clubs or other spheres of life. Many golf club managers have morphed into very effective leaders within their clubs from a plethora of different previous careers. After many years of teaching PE, when I accepted a new role as deputy head, I had responsibility for overseeing adult education classes. Challenging pupils, talented individuals, school trips and thinking on one's feet had been the norm, but now I was up close and personal with the general public. One challenge, I recall with mixed emotions, came in the shape of an enthusiastic but over-zealous participant in the life drawing class. I had been summoned to adjudicate on a rather tense situation and on reaching the Art Studio was greeted by the sight of a student in close proximity to a rather shapely model! To be fair, his drawing was very good and, dare I say, remarkably accurate. Needless to say, tact, diplomacy and a firm hand were required. I had sort of expected the unexpected, but on this occasion, I was unsurprisingly surprised.

Running a golf club brings trials and tribulations of their own. Everyone has anecdotal stories of peculiar situations in which they have found themselves. One management tool I learned early on was to record everything. Even some of the most innocuous conversations or situations can come back and bite you. Member behaviour, arrangements for golf, even decisions on socials can all, in their own way, end up taking you to unanticipated outcomes. I liked to think that I was a half-decent leader, not too bad on the communication side and reasonably well-organised. In management, structure and routine can be crucial. This structure and routine proved invaluable in the 'lost' Lost Property episode. Relying on honesty is fine, if you can honestly rely on it. And you can't! Fortunately, new procedures, policies of recording lost items and their safe storage bore fruit shortly after a prized possession had been lost, and found, only to be lost again overnight. It was potentially even more embarrassing as we had just informed the rightful owner that we had found his range finder. Having, on the face of it, a bureaucratic system, eventually saved considerable time, helped identify the culprit and concluded the situation with the inevitable outcome.

Members generally behave in accordance with what is expected, but one of the hardest jobs is dealing with inappropriate behaviour. 'Overuse' of the bar facilities, not conforming to course access protocols or firing abuse to fellow members can all, to varying levels, provide a headache for those with responsibility. By the time there is a serious problem where action is required, tracking back and recalling or recounting situations does not stack up. Where is the evidence? I eventually resorted to cataloguing and requiring

statements from witnesses whenever issues were presented to me. Thankfully, they were few and far between.

One of the most enduring and frustrating challenges in golf club management is the potential 'conflict' that surrounds course closure. Despite clear 'course closure' policies and a real desire to offer golf whenever possible, even our downland course closes occasionally. One particularly frosty/icy morning, we were faced with the probability of play not only causing damage to the course, but also potentially to anyone foolish enough to venture out. The normal 'dribble' of Vets had already voiced its frustration. One member was then more abrupt: "Well, when is it going to open, then?" My answer: "The greenkeepers are doing an inspection at 10am but it's looking unlikely that we will open."

I guessed what might happen, and it did... at 10.04am! "Well?" was the comment from the same member as his frame appeared in my doorway. A most polite reply from me: "Sorry, I haven't had a report yet but looking outside, the conditions do not seem to have improved. As soon as I hear anything, I'll let you know." Ten minutes later, it was confirmed - the course remained closed, re-inspection at 12 midday. I headed to the lounge with the latest update. There was much shaking of heads as I delivered the news before retreating. I had almost reached the sanctuary of my office when I was aware that someone was following me. I turned to meet the frosty glare of one of the seasoned Vets, Duncan. "Ah Duncan, can I help you?"

"Yes, Alan. A couple of us were wondering - as we don't want to wait till midday, could we go for a walk on the course and just take a couple of clubs and a ball?" Do not try to apply logic to that particular event.

Strangely, it isn't always about getting on the course that can create a 'situation'. One particularly wet and windy day, the ladies had sensibly decided not to venture out during their allotted tee-times. The pro, aware of the situation, had allowed some desperate green fee payers out on the understanding that, should the ladies decide to venture out, they would need to let them go first. It all seemed eminently sensible, had pleased the enthusiastic green fee payers and the ladies seemed to be enjoying a chat in the comfort of the lounge. I was taken aback, though, when one lady appeared asking why golfers were going out when it was the ladies' booked tee times! I suppose that taught me that many members want it both ways.

One of the best parts of managing a golf club is the opportunity to get involved with course development. Working at a club with over 125 years of history, little had changed on the course for many years, but like many others, technology, all-year-round play, member demands and course layout all needed thinking about.

For example, some bunkers had morphed considerably from their position and shape as suggested, with considerable expertise and experience, by James Braid. We had also fallen into the trap (pun intended) of letting one past captain, with no expertise or experience, introduce a new bunker during his temporary period of office. Two World Wars had also left their mark, with troops practising manouevres on the course during WWI. Not to be outdone, during WWII, Luftwaffe returning home would, if they had not had the chance to drop their payloads over London, deposit them on Sussex, more precisely, the Downs.

Fast forward 70 years, and one of our Vets, Ken, played three times a week. However, with advancing years he unfortunately seemed to spend increasing amounts of time in the sand and less on the fairways. Ken was also finding getting out of the bunkers a more difficult challenge - not the ball, mind you. It was just that he couldn't physically get out! It was an October morning when Ken's approach to the 15th found the sand. A swish with his sand wedge (deeper into the sand than he would have preferred) resulted in a strange metallic noise. Fortunately, Ken, thinking something was amiss, had the presence of mind to call a passing greenkeeper. To cut a long story short, the bomb squad were alerted and finally carried out a controlled explosion, considerably changing the topography of that bunker! The bunker, never particularly liked, remains known as '...ken bunker', which is subtly different from 'Ken's bunker'!

A few weeks after the stag vs greenkeeper stand-off in the photo (one of our more aggressive stags - the stag won!), we had more four-legged friends on the course. I received a call informing me that we were under siege by sheep. By the time I arrived on the 12th, six ladies were trying valiantly to shepherd 50+ sheep away from the green and fairway, back through the hole in our perimeter fence. Twenty minutes later we had the same number of sheep, but a further six ladies! We had arrived at a particularly low point in proceedings when the earlier phone call to the neighbouring farmer bore fruit. He arrived on his modern-day chariot - a quad bike with a collie riding shotgun - we gratefully stood aside, and our fruitless labour of half an hour was quickly put into perspective by Colin the collie. Job done in three minutes flat! Truly impressive!

Am I glad that I'm now retired? Have a guess! GCS

### The World Handicap System: data protection issues for golf clubs





**Alistair Smith**, Chief Executive of the NGCAA, delves deeply into the GDPR implications of requests from the national unions for certain member data for the purposes of the new World Handicap System

#### The background

With the switchover to the World Handicap System (WHS) in November 2020, many clubs will have received a request from their national golf unions for the provision of member data. Those who have not had such a request may well receive one soon.

We understand that the request from the national unions is likely to have been accompanied by a statement to the effect that each club is not required to obtain the consent of each individual club member for the provision of their personal data. We understand that the data requested is the name, date of birth and email address of each golfer.

Each club holds member data and in doing so should hold that data in accordance with the principles set out in the General Data Protection Regulation (GDPR - Regulation (EU) 2016/679). Those principles include an obligation that the data is processed lawfully, fairly and in a transparent manner, as well as that it should be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. The data should be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Each club, as a data controller, could face potential liability if it were to breach the GDPR, which can include criminal prosecution and civil penalties including fines. It is therefore of the utmost importance that each club is able to satisfy itself in relation to the legitimacy of the processing and potential onward transmission of members' data requested. As will be seen within this article, it could be a dangerous step for a club to simply rely upon the contention from a national golf union to say that the consent of individual members is not required for the transfer of the data.

Data protection can be a dry subject, but we encourage managers to stick with this article to ensure that they are comfortable with their position on data protection before progressing.

#### Consent required?

We understand that at least one national golf union is relying upon article 6 of GDPR to say that it permits them to obtain the data of individual golfers without their consent because:

- (a) processing is necessary for the performance of the contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract; and
- (b) processing is necessary for the purposes of the legitimate interests pursued by the controller

#### Contract

Looking at the first contention that the processing is necessary for the performance of the contract, our view is that it is highly unlikely that there is a properly constituted contract between the national unions and each individual golfer.

There will be a contract between each individual club and individual golfer and so if reliance is to be placed upon that contract, there is the possibility of this provision being applicable and that members' consent may not be needed. However, it is subject to the proviso that a club will need to examine the nature of the contract with its member in great detail. For example, if the membership contract (normally the constitution) is drafted on the presumption that handicaps would be administered by the club rather than a third party, then this provision would not suffice. There is also a distinction to be drawn between a club that has a legal obligation to provide its members with handicaps and one where it does so voluntarily, although it must be accepted that through time and through course of dealing, there is a risk that any such voluntary term may become a contractual obligation.

There is a further difficulty in relation to this contractual exception as well, in that the contractual provision of a handicap operated to this point would have been based upon the handicapping system that we had previously, not the new WHS system. An express clause in the constitution between the club and member where the club promises to provide a handicap would need to be drafted sufficiently widely to include the new system. If the contractual obligation was to provide data on the basis of it being shared with a third party to administer handicaps, that may be sufficient. If it was only to provide it to an ISV (Independent Software Vendor) such as Club Systems, then it would not.

There is also a point to consider that some club members will not want a handicap and so this contractual obligation could not be relied upon to avert the need for consent for them.

In summary, it is highly unlikely that there will be a contractual ground to entitle clubs to process all of this member data without consent.

#### Legitimate interest

Turning to the second part of Regulation 6, namely the legitimate interest, we do so on the assumption that there is no contractual obligation to provide an official handicap.

In relying upon legitimate interest, there are three matters to consider, namely that the club is pursuing a legitimate interest, whether the transfer is necessary for that purpose, and that the individual's interests in privacy of their data do not override the legitimate interest.

We are of the view that the national unions almost certainly do have a legitimate interest in making handicaps available. It is of course dependent upon the wishes of each individual.

Do the individual interests override a legitimate interest? An individual interest is unlikely to be overriding in the case of those wanting handicaps. For those who do not want a handicap, the individual interest serves to bolster arguments of the absence of legitimate interest and lack of necessity. This would force the national unions to consider that they cannot treat every golf club member of every club in the same way.

As for necessity, there are questionmarks here as to why the national unions require the additional data. Particularly with reference to emails, we understand that at least one national union contends that it is required for player identification. The biggest question here as far as necessity is concerned is why, when the ISVs are to remain in place, the email address is required in order for national unions to contact individual golfers. Even for those national unions where ISVs may not remain in place, the provision of the email address as an identifier may still be questionable unless it can be answered more satisfactorily in discussions between clubs and those national unions.

In summary, the legitimate interest exception cannot be relied upon safely in order to say with any certainty that clubs should send on all of their member data to the national unions.

We know from discussions with some ISVs that they propose to amend their system to allow an opt-in for the data transfer. This would be a sensible precaution while giving those who have no wish to have a handicap the right not to have the data transferred.

#### Conclusion

Our view is that a contention by a national union that member consent is not required in order to process member data is too bold and too wide to be accepted.

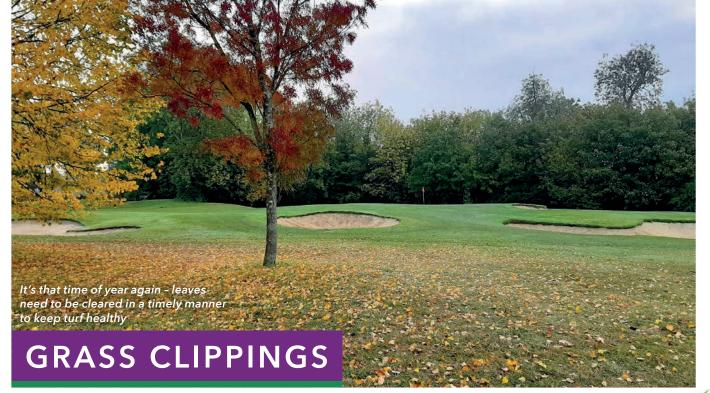
If an individual golfer does want an official handicap, then the national union's position that they have a legitimate interest in obtaining and processing data for the purpose of managing handicaps is valid but that does not necessarily mean that it is entitled to all of the data requested

The most effective way of ensuring compliance is to introduce an opt-in system informing members of the national union's requirement as to their personal data if they want an official handicap.

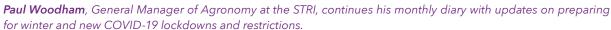
Ultimately, if golfers want an official handicap under the WHS, then the national unions are perfectly entitled to process the data. At the moment, though, there is no safe reason to advise clubs to transfer this data without the consent of the members. Any pre-existing consents should be looked at carefully before clubs rely on those to release the data. Is the consent wide enough to cover: (1) the bodies to whom the data is going; (2) the extent of the data; and (3) the purpose for which the data is being released (bearing in mind it is in respect of a new handicapping system, not the system that was previously in operation).

For any further advice in respect of legal matters affecting your golf club, please do not hesitate to contact the **NGCAA** on **01886 812943** or **office@ngcaa.co.uk** 





### The challenges of autumn 2020





y notes in October's GCS Newsletter discussed the need to give back what has been used on the course In terms of managing and recovering wear. Many courses did complete adjusted green and tee renovation programmes but there are equally as many who have delayed the works due to the extended competition season. For some, the renovations have been pushed back too far or omitted due to the need to manage costs, the competition season being extended too far and the implications of regional lockdowns or restrictions.

At the time of writing, the Welsh Assembly had announced a two-week total closure of golf courses, with Irish courses also closed for six weeks as a result of new lockdown measures and restrictions. Whether or not these measures might impact the maintenance of courses may have become clearer by the time The GCS publishes this November update, but my day-to-day activities have suddenly become busy, with client communications seeking clarity on what may be deemed as 'essential maintenance' operations heading into winter.

For me, autumn is a critical time of year in terms of pest and disease management, let alone keeping the main playing surfaces free from the accumulation of falling leaves, which smother the surface of light and air if not cleared in a timely manner without damage.

Much of the changing nature of controlling disease in an integrated turf management strategy is relying on keeping surfaces as dry as possible with removal and reduction of dew, good aeration, turf health applications and good drainage. Course drainage networks need to be functioning. Ditches should be kept as clear as possible. I have seen many courses where the usual clearance of ditches had not been undertaken during spring due to the lockdown. This will need to be checked.

This may be a winter of impossibilities if staffing resources are shut down or reduced too far, and the consequences will be seen in the spring.

Winter will also be a time when the function and setting of irrigation pop-up sprinklers can be checked. Again, spring commissioning in 2020 was a rushed job with minimal resources during the lockdown heading into a period of early-season drought. I have seen sunken and tilting sprinklers all season with complications on the accuracy of the irrigation they provide.

There are, of course, choices to be made, but this needs to be communicated to memberships. Turf will recover, but less so if transitioning from a turf that is overplayed and ill-prepared for winter into a dry and cold spring. As ever, please do contact me via paul.woodham@strigroup.com if you would like to further discuss this month's update. GCS

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