WEALDSTONE FOOTBALL CLUB

DATA PROTECTION POLICY

Policy Statement

² ŜIˑfŘăŰƨyŜ C/ needs to collect, store and process personal data in order to carry out effective delivery of its activiti es. We are fully committed in our responsibility to safely use and protect personal data we collect from staff, play ers, æƨfDzyŰŜŜNăM ăDzLJLJƨNŰŜNăM parents/carers and all other associated individuals. This policy sets out the basis on whic h we will process any personal data we collect and acknowledges certain legal safeguards specified in the General Data Protection Regulations (GDPR).

1 Scope of Policy

1.1 All ² ŜIˑfŘăŰƨyŜ staff IˑyŘ other authorised third parties (including temporary or agency workers, contractors and volunteers) who have access to any personal data held by or on behalf of the organisation, must adhere to this policy and associated procedures.

1.2 Personal data is any information relating to an identified or identifiable person (referred to as a 'data subject'). An identifiable person can be identified, directly or indirectly, by reference to an identifier such as a name, and identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

1.3 The information covered by this policy includes all written, spoken and electronic personal data held, used or transmitted by or on behalf of Wealdstone FC and its affiliates, in whatever media. This includes personal data held on computer systems, hand-held devices, phones, paper records, and personal data transmitted orally.

1.4 This policy will be reviewed and updated in accordance with data protection obligations. Wealdstone FC may amend or update the policy from time to time and will issue an appropriate notification of any changes at the relevant time.

2 Data Protection Principles (GDPR)

Article 5 of the GDPR requires that personal data shall be:

(a) Processed lawfully, fairly and in a transparent manner.

(b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

(c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

(d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

(e) Kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the personal data are processed; and

(f) Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

(g) Protected by design; all procedures and processes need to be designed with data protection in mind. Compliance with legal requirements and good practice needs to be built into the design stage of projects and changes.

5 Processing for Limited Purposes and Storage

5.1 In the processes our organisation carries out, we may collect and process the personal data set out in Appendix A. This data will include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, business partners, sub-contractors and delivery services).

5.2 We only process personal data for the specific purposes set out in Appendix A or for any other purposes specifically permitted by the GDPR. We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter.

5.3 With regard to storage of data, we shall keep personal data in a form which permits identification of data subjects for no longer than is necessary and for the purposes for which the data is initially processed.

5.4 Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research or statistical purposes subject to implementation of the appropriate technical and organisational measures.

6 Individual Rights

Wealdstone FC will adhere to the GDPR rights for individuals (incl. member representatives) which stipulate:

(a) The ***right to be informed*** about the collection and use of their personal data. Individuals/member organisations w ill be provided with privacy information including the purposes for processing their personal data, retention per iods for that data and who it will be shared with (if applicable).

(b) The ***right to access*** their personal data and supplementary information so they can be aware of and verify th e lawfulness of the processing. To submit a subject access request, the individual/member should apply in wr iting detailing the information they require access to, to the Data Protection Officer (DPO) via email: richardhopwood@wealdstonefc.com. In some cases, we may need to ask for proof of identity before process ing the request.

Wealdstone FC will respond to a request within one month from the date of receipt and this will normally be in an el ectronic format, unless requested otherwise. If a subject access request is manifestly unfounded or excessive the organisation is not obliged to comply with it. Alternatively, the organisation can agree to respond on account of charging a fee based upon the administrative cost.

(c) The ***right to rectification or erasure*** allows individuals to request that any inaccurate personal data is rectified/ updated or that their data is permanently erased. A request for rectification or erasure should be made in writing to the DPO (as above) who will complete the request within one month from the date of receipt. Electronically held data will be irretrievably deleted and hardcopy data will be shredded and disposed of securely.

(d) The ***right to restrict processing*** enables individuals to restrict or stop how their data is being processed whereby it is no longer necessary for the purposes of the processing; if the individual's rights override the organisation's legitimate grounds for processing data or if there is a dispute relating to this override of individual rights.

(e) The ***right to object*** to processing based on legitimate interests or the performance of a task in the public interest/ exercise of official authority (including profiling) and direct marketing. Individuals can also complain to the Information Commissioner's Office at https://ico.org.uk/if they think County Academy has failed to comply with data protection legislation.

7 Data Security

7.1 Wealdstone FC will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

7.2 We will put procedures in place and use technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if they agree to comply with those procedures and policy principles.

7.3 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as:

(a) **Confidentiality** means that only people who are authorised to use the data can access it.

(b) **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.

(c) **Availability** means that authorised users should be able to access the data if they need it for authorised purposes.

7.4 Security procedures include:

(a) **Entry Controls.** Any unauthorised individuals should be reported.

(b) **Secure lockable desks and cupboards.** Any confidential information held in paper form should be kept locked in secure locations with restricted access.

(c) **Methods of disposal.** Paper documents should be shredded, and digital storage should be irretrievably deleted when they are no longer required.

(d) **User profiles.** Wealdstone FC will ensure that personal data held on computer databases and electronic devices are secured with password protection and encryption protocols.

(e) **Equipment.** Data users must ensure that personal information is not displayed in the presence of others and that devices are locked or shutdown when not in use or left unattended.

8 Data Breach

8.1 If ² ŜI·fŘăŰ2yŜC/ discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals/data subjects it will report it to the Information Commissioner's Office.

8.2 If the breach is likely to result in a high risk to the rights and freedoms of any individuals, ² ŜI·fŘăŰ2yŜC/ will inform the affected parties that there has been a breach and provide them with information about the likely consequences and any mitigation measures taken.

9 Disclosure and Sharing of Personal Information

9.1 ² ŜI·fŘăŰ2yŜC/ shares personal data it holds with members of its organisation group, including subsidiaries, the ultimate holding company and its subsidiaries, as defined in section 1159 of the UK companies Act (2006).

9.2 We may have to share data with other agencies such as public sector authorities, funding bodies and other voluntary agencies, but will only do so with express consent.

9.3 We may be under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the data subject or other agreements; or to protect our rights, property, or safety of our employees, students, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

10 Accountability

Wealdstone take responsibility for complying with the GDPR, at the highest management level and throughout the organisational structure. We will put in place appropriate technical and organisational measures to safeguard person al information. This will include:

(a) Adopting, implementing and reviewing our data protection policy and associated policies on a regular basis.

(b) Taking a 'data protection by design and default' approach to ensure data protection and privacy measures are in place throughout the lifecycle of our processing operations.

(c) Securing confirmation of satisfactory safeguards being in place with organisations that process any personal data on our behalf.

(d) Maintaining secure documentation of our processing activities.

(e) Implementing appropriate security measures and recording/reporting personal data breaches correctly.

(f) Ensuring data protection safeguards are an integral part of our risk assessment processes and procedures.

11 Staff Responsibilities and Training

Training will be provided on Wealdstone FC data protection responsibilities to all staff as part of their induction process. In th e course of their employment, staff may have access to the personal data of others and the organisation relies on indiv iduals to help meet its data protection obligations. All staff are required to:

(a) Understand that they are contractually responsible for adhering to good data protection practice.

(b) Only access data that they have authority to access and only for authorised purposes.

(c) Not disclose data except to individuals who have appropriate authorisation, whether internal or external to the organisation.

(d) Keep data secure by complying with the rules on access to premises, computer systems, including password protection, secure file storage and ongoing deletion/shredding of documents that are no longer required for the purpose intended.

(e) Not remove personal data or portable devices containing, or that can be used to access, personal data from the organisation's premises without adopting appropriate security measures such as encryption and password protection, and not leaving devices unattended or within unoccupied vehicles.

(f) Not store personal data on local drives or on personal devices that are used for work purposes.

Any failures to observe these requirements may lead to disciplinary action which will be addressed under the organisation's disciplinary procedures.

DATA PROCESSING ACTIVTIES

Type of data	Type of data subject	Purpose of which data is held and processed	Retention period
General personal data	Employees, students, parents/carers, volunteers	Data collected for registration purposes, completing forms, recording data for contact and communication purposes	6 years
Contact details	Students, parents/carers	Enrolment on education and football programmes, emergency contact, communicating on progress, wellbeing and any other issues	Duration of enrolment (Typically, 2 years)
Information relating to gender, race and ethnic origin	Employees, students, parents/carers, volunteers	Ethnic monitoring, ensuring equal opportunity (such data is held anonymously). Information may also be apparent on photographs and CCTV which is operated for security reasons	Only used for statistics anonymously
Information relating to health	Employees	Recruitment, administering and managing employment where it is or may be affected by health. This includes obtaining, holding and using records of absence and sickness, medical and occupational health reports and certificates, making adjustments to working arrangements, making decisions on capacity for work and continuing employment, providing insurance benefits	6 years
Information relating to criminal offences and alleged offences	Employees	Recruitment and managing employment in the light of any criminal offence or alleged offence, making decisions on continuing employment, e.g. DBS checks	3 years
Financial information	Employees	For salary payment purposes	Duration of employment only
Other sensitive personal data	Employees, interviewees, applicants	Original purpose for obtaining data, e.g., CVs	3 months unless employed
CCTV imaging	Employees, students, volunteers, general public	For security and health and safety reasons	30 days unless for legal reasons