Ottershaw Junior Football Club – Data Protection Policy

(Updated in line with FA guidance and UK GDPR)

1. About This Policy

1.1 This policy explains how Ottershaw Junior Football Club ("the Club", "we", "us") manages personal data. It must be kept with other club policies and made available to all volunteers, coaches, managers, committee members and anyone who handles personal data on behalf of the Club.

1.2 The Club processes personal data relating to players, parents/carers, volunteers, coaches, referees, committee members, contractors, suppliers and other individuals we communicate with.

1.3 In your role with the Club, you may process personal data on our behalf. We also process personal data about you. We are committed to handling all personal data lawfully, securely and transparently, in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

1.4 Correct and lawful treatment of personal data maintains trust in the Club and protects the rights of players, parents and volunteers. This policy sets out the responsibilities of the Club and everyone acting on its behalf.

1.5 You must comply with this policy whenever you process personal data for the Club.

1.6 The Club Committee is responsible for ensuring compliance. Any questions or concerns must be referred to the Committee.

1.7 We process personal data for legitimate club purposes, including administration, safeguarding, communication, registration and football operations. Our lawful bases include contract, legal obligation, consent, legitimate interests and vital interests. We retain personal data only for as long as necessary, in line with our Privacy Notice.

2. What We Need From You

To help the Club comply with UK GDPR, you must:

2.1 Follow the Club's Privacy Notice and only process personal data for the purposes stated.

2.2 Never collect additional personal information without Committee approval.

2.3 Correct personal data when requested, ensuring you can identify the individual before making changes.

2.4 Follow the Club's retention periods and securely delete/destroy data when no longer required.

2.5 Treat all personal data as confidential.

- Electronic data must be password-protected and stored securely.
- Hard-copy data must be locked away and never left in cars or public places.

2.6 Consult the Committee before using new digital systems or cloud storage.

2.7 Never share personal data with new third parties without Committee approval.

2.8 Immediately report any **subject access request** to the Committee.

2.9 Immediately report any **data breach**, including lost devices, mis-sent emails, or unauthorised access.

3. Data Protection Principles

All personal data must be:

- **Lawful, fair and transparent**
- **Collected for specific, legitimate purposes**
- **Adequate, relevant and limited**
- **Accurate and kept up to date**
- **Stored only as long as necessary**
- **Securely protected against loss, damage or unauthorised access**

The Club must be able to demonstrate compliance with these principles.

4. Fair and Lawful Processing

We process personal data fairly and lawfully, using one or more of the following legal bases:

- Consent
- Contract
- Legal obligation
- Vital interests
- Legitimate interests

Special category data (e.g., medical information) is processed only when necessary for safeguarding or safety, with appropriate safeguards.

5. Processing for Limited Purposes

We only process personal data for legitimate Club purposes, including:

- Player registration
- Safeguarding and welfare
- Communication with parents/carers
- League affiliation
- DBS and qualification verification
- Emergency contact and medical safety
- Club administration and operations

Individuals are informed of these purposes through our Privacy Notice.

6. Consent

Where consent is required:

- It must be freely given, specific and informed.
- It must be easy to withdraw at any time.
- Consent for children must be provided by a parent/carer.
- Consent is refreshed each season.
- Records of consent must be kept.

7. Notifying Individuals

When collecting personal data, we inform individuals about:

- Purpose of processing
- Legal basis
- Legitimate interests (if applicable)
- Consequences of not providing data
- Third-party sharing
- Data retention periods
- Their rights under UK GDPR
- Who the data controller is
- How to contact the Club about data protection

8. Adequate, Relevant and Limited Data

We only collect the minimum personal data required. Volunteers may only process data necessary for their role. Data no longer needed must be deleted or anonymised.

9. Accurate Data

We ensure personal data is accurate and updated:

- At the point of collection
- At the start of each season
- Whenever notified of changes

Out-of-date or inaccurate data must be corrected or deleted.

10. Data Retention

We do not keep personal data longer than necessary. Retention periods are set out in our Privacy Notice.

11. Data Subject Rights

Individuals have the right to:

- Be informed
- Access their data
- Rectify inaccurate data
- Request deletion (“right to be forgotten”)
- Restrict processing
- Data portability
- Object to processing
- Avoid automated decision-making

Requests must be reported to the Committee immediately.

12. Data Security

We take appropriate technical and organisational measures to protect personal data:

- Secure storage (passwords, locked cabinets)
- Shredding of paper documents
- Secure destruction of digital devices
- Screens locked when unattended
- Password-protected spreadsheets

- Personal devices must have password protection and antivirus software
- Club data must be removed from personal devices when roles end

Data processors must have GDPR-compliant contracts.

13. Sharing Personal Data

We may share data with:

- Surrey FA
- The FA
- Leagues (via Whole Game System)
- Approved suppliers (e.g., registration platforms)
- Emergency services
- Venue providers (where required for safeguarding)

We only share data when lawful and necessary.

14. International Transfers

Personal data may only be transferred outside the UK where appropriate safeguards exist.

15. Reporting Data Breaches

Any suspected breach must be reported immediately to the Committee. We may need to notify the ICO and affected individuals.

16. Subject Access Requests

All requests for personal data must be forwarded to the Committee immediately. Identity must be verified before releasing any information.

17. Accountability

The Club must:

- Maintain GDPR-compliant processes
- Provide training to volunteers
- Review data protection measures regularly
- Maintain documentation demonstrating compliance

18. Changes to This Policy

We may update this policy at any time. Updates will be communicated where appropriate.