



Privacy (GDPR) Policy

Nostell Miners Welfare Football Club

About this Policy

1. This Policy is to help clubs deal with data protection matters internally. This should be kept with other club policies and a copy should be given (or made available) to all staff members, volunteers and others who come into contact with personal data during the course of their involvement with the club.
2. Nostell Miners Welfare Football Club, ("**NMWFC**", "**we**", "**our**", "**us**") handles personal data about current, former, and prospective players [and their parents or guardians], volunteers, committee members, other Club / County FA / League members, coaches, managers, contractors, third parties, suppliers, and any other individuals that we communicate with.
3. In your official capacity with the Club, you may process personal data on our behalf and we will process personal data about you. We recognise the need to treat all personal data in an appropriate and lawful manner, in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**).
4. Correct and lawful treatment of this data will maintain confidence in the Club and protect the rights of players and any other individuals associated with the Club. This Policy sets out our data protection responsibilities and highlights the obligations of the Club, which means the obligations of our committee, volunteers, members, coaches and any other contractor or legal or natural individual or organisation acting for or on behalf of the Club.
5. You are obliged to comply with this policy when processing personal data on behalf of the Club, and this policy will help you to understand how to handle personal data.
6. The Club's committee and coaches will be responsible for ensuring compliance with this Policy. Any questions about this Policy or data protection concerns should be referred to the Club Secretary in the first instance.
7. We process volunteer, member, coach, contractor, committee, supplier and third party personal data for administrative and Club management purposes. Our purpose for holding this personal data is to be able to contact relevant individuals on Club business and our legal basis for processing your personal data in this way is the contractual relationship we have with you. We will keep this data until the end of your official relationship with the Club unless required otherwise by law and / or regulatory requirements. If you do not provide your personal data for this purpose, you will not be able to carry out your role or obligations with the Club.
8. All the key definitions under GDPR can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/>
9. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.

- 10.If we receive personal data about an individual from other sources, we will provide the above information as soon as possible and let them know the source we received their personal data from;
- 11.We will also inform those whose personal data we process that we, the Club, are the data controller in regard to that data, and which individual(s) in the Club are responsible for data protection.
- 12.The Club is aware that not all individuals' rights are absolute, and any requests regarding the above should be immediately reported to the committee, and if applicable escalated to the League and/or County FA for guidance.

What we need from you

1. To assist with our compliance with GDPR we will need you to comply with the terms of this policy. We have set out the key guidance in this section but please do read the full policy carefully.
2. Please help us to comply with the data protection principles (set out briefly in section 3 of this policy and in further detail below):
 - i. please ensure that you only process data in accordance with our transparent processing as set out in our Privacy notice;
 - ii. please only process personal data for the purposes for which we have collected it (i.e. if you want to do something different with it then please speak to the Club Secretary in the first instance);
 - iii. please do not ask for further information about players and / or parents or guardians and / or committee members and / or volunteers without first checking with the Club Secretary;
 - iv. if you are asked to correct an individual's personal data, please obtain the correct data and pass to the Club Secretary to make the relevant updates on our records and systems;
 - v. please comply with our retention periods listed in our Privacy Notice and make sure that if you still have information which falls outside of those dates, that you delete/destroy it securely;
 - vi. please treat all personal data as confidential. If it is stored in electronic format then please consider whether the documents themselves should be password protected or whether your personal computer, tablet or phone is password protected and whether you can limit the number of people who have access to the information. Please also consider the security levels of any cloud storage provider (and see below). If it is stored in hard copy format then please make sure it is locked away safely and is not kept in a car overnight or disposed of in a public place;
 - vii. if you are looking at using a new electronic system for the storage of information, please talk to the Club Secretary first so that we can decide whether such a system is appropriately secure and complies with GDPR;
 - viii. if you are planning on sharing personal data with anybody new or with a party outside the FA structure then please speak to the Club Secretary before doing so who will be able to check that the correct contractual provisions are in place and that we have a lawful basis to share the information;

- ix. if you receive a subject access request (or you think somebody is making a subject access request for access to the information we hold on them) then please tell the Club Secretary as soon as possible because we have strict timelines in which to comply;
- x. if you think there has been a data breach (for example you have lost personal data or a personal device which contains personal data or you have been informed that a coach has done so, or you have sent an email and open copied all contacts in) then please speak to the Club Secretary who will be able to help you to respond.

If you have any questions at any time then please just ask the Club Secretary.

Data protection principles

1. Anyone processing personal data must comply with the enforceable principles of data protection. Personal data must be:
 - i. processed lawfully, fairly and in a transparent manner;
 - ii. collected for only specified, explicit and legitimate purposes;
 - iii. adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;
 - iv. accurate and, where necessary, kept up to date;
 - v. kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;
 - vi. processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage;

Fair and lawful processing

1. This Policy aims to ensure that our data processing is done fairly and without adversely affecting the rights of the individual.

Processing for limited purposes

1. The Club collects and processes personal data. This is data we receive directly from an individual and data we may receive from other sources.
2. We will only process personal data for the purposes of the Club as instructed by the committee, the County FA or The FA, or as specifically permitted by the GDPR. We will let individuals know what those purposes are when we first collect the data or as soon as possible thereafter.

Notifying individuals

Where we collect personal data directly from individuals, we will inform them about:

1. the purpose(s) for which we intend to process that personal data;
2. the legal basis on which we are processing that personal data;
3. where that legal basis is a legitimate interest, what that legitimate interest is;

4. where that legal basis is statutory or contractual, any possible consequences of failing to provide that personal data;
5. the types of third parties, if any, with which we will share that personal data, including any international data transfers;
6. their rights as data subjects, and how they can limit our use of their personal data;
7. the period for which data will be stored and how that period is determined;
8. any automated decision-making processing of that data and whether the data may be used for any further processing, and what that further processing is.

Adequate, relevant and non-excessive processing

1. We will only collect personal data that is required for the specific purpose notified to the individual.
2. You may only process personal data if required to do so in your official capacity with the Club. You cannot process personal data for any reason unrelated to your duties.
3. The Club must ensure that when personal data is no longer needed for specified purposes, it is deleted or anonymised.

Accurate data

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at the start of each season. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

Timely processing

We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required, as per our Privacy Notice which is available on the Club website.

Processing in line with data subjects' rights

As data subjects, all individuals have the right to:

- i. be informed of what personal data is being processed;
- ii. request access to any data held about them by a data controller;
- iii. object to processing of their data for direct-marketing purposes (including profiling);
- iv. ask to have inaccurate or incomplete data rectified;
- v. be forgotten (deletion or removal of personal data);
- vi. restrict processing;
- vii. data portability; and
- viii. not be subject to a decision which is based on automated processing.

Data security

1. We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
2. We have proportionate procedures and technology to maintain the security of all personal data.
3. Personal data will only be transferred to another party to process on our behalf (a **data processor**) where we have a GDPR-compliant written contract in place with that data processor.
4. We will maintain data security by protecting the confidentiality, integrity and availability of the personal data.
5. Our security procedures include:
 - i. **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed.
 - ii. **Equipment.** Screens and monitors must not show personal data to passers-by and should be locked when unattended. Excel spreadsheets should be password protected.
 - iii. **Personal Devices.** Anyone accessing or processing the Club's personal data on their own device, must have and operate a password only access or similar lock function, and should have appropriate anti-virus protection. These devices must have the Club's personal data removed prior to being replaced by a new device or prior to such individual ceasing to work with or support the Club.

Disclosure and sharing of personal information

1. We share personal data with the County FA and The FA, and with applicable leagues using Whole Game System.
2. We may share personal data with third parties or suppliers for the services they provide and instruct them to process our personal data on our behalf as data processors. Where we share data with third parties, we will ensure we have a compliant written contract in place incorporating the minimum data processor terms as set out in the GDPR, which may be in the form of a supplier's terms of service.
3. We may share personal data we hold if we are under a duty to disclose or share an individual's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the individual or other agreements; or to protect our rights, property, or safety of our employees, players, other individuals associated with the Club or others.

Transferring personal data to a country outside the EEA

We may transfer any personal data we hold to a country outside the European Economic Area (**EEA**), provided that one of the appropriate safeguards applies.

Dealing with subject access requests

1. Individuals may make a formal request for information we hold about them. Anyone who receives such a request should forward it to the

committee immediately, and where necessary escalated to the County FA/ FA for guidance. Nobody should feel bullied or pressured into disclosing personal information.

2. When receiving telephone enquiries, we will only disclose personal data if we have checked the caller's identity to make sure they are entitled to it.

Changes to this policy

Lawful processing means data must be processed on one of the legal bases set out in the GDPR. When special category personal data is being processed, additional conditions must be met.

Consent

1. One of the lawful bases on which we may be processing data is the individual's consent.
2. An individual consents to us processing their personal data if they clearly indicate specific and informed agreement, either by a statement or positive action.
3. Individuals must be easily able to withdraw their consent at any time and withdrawal must be promptly honoured. Consents should be refreshed every season.
4. Explicit consent is usually required for automated decision-making and for cross-border data transfers, and for processing special category personal data. Where children are involved then the consent must be in writing from parent/guardian
5. Where consent is our legal basis for processing, we will need to keep records of when and how this consent was captured.
6. Our Privacy Notice sets out the lawful bases on which we process data of our players and members.

Accountability

1. The Club must implement appropriate technical and organisational measures to look after personal data, and is responsible for, and must be able to demonstrate compliance with the data protection principles.
2. The Club must have adequate resources and controls in place to ensure and to document GDPR compliance, such as:
 - i. providing fair processing notice to individuals at all points of data capture;
 - ii. training committee, coaches and volunteers on the GDPR, and this Data Protection Policy; and
 - iii. reviewing the privacy measures implemented by the Club.

Reporting a personal data breach

1. In the case of a breach of personal data, we may need to notify the applicable regulatory body and the individual.
2. If you know or suspect that a personal data breach has occurred, inform a member of the committee immediately, who may need to escalate to the County FA/ FA as appropriate. You should preserve all evidence relating to a potential personal data breach.

We reserve the right to change this policy at any time. Where appropriate, we will notify you by email.



APPENDIX ONE: NMWFC DATA PROTECTION POLICY – DETAILED GUIDANCE

Data collection or processing	Reason	Club Policy
<p>1) Personal data of players – names, addresses and dates of birth – captured on the annual player registration forms and signed by parents.</p>	<p>There is a requirement for the Registrations Secretary to enter this data onto the FA WGS system to register players. The system is password protected and secure and subject to FA’s own data policy.</p>	<p>None – this is an obligation as an FA affiliated club. However, it should be communicated to parents that data is entered onto third party FA software and subject to their privacy rules. This should be done on the player registration form (the point of collection) and via a club privacy notice.</p>
<p>2) Further personal data of players – next of kin contact details, email addresses and medical conditions – captured on the annual player registration forms and entered onto NMWFC Excel player register held securely on Dropbox and only accessible by Treasurer and Secretary together with the data captured in 1) above.</p>	<p>The club needs emergency contacts to ensure the children’s safety in case of emergency and for this reason medical conditions are also required.</p>	<p>The same data still needs to be captured and held. It is secure on Dropbox. However, as above, it needs to be communicated to parents and this should be done on the player registration form (the point of collection) and via a club privacy notice.</p> <p>A further consideration is the Special Data being medical conditions. To allow NMWFC to hold this form of data the child’s guardian must give explicit consent and it must be vital to protect the interests of the subject (which it does as it will safeguard their health whilst playing) so a new box needs to be included on the player registration form to this effect so parents or guardians of children with special conditions must tick the box. If they don’t, they must be spoken to and their consent gained before data is held.</p>
<p>3) The Excel spreadsheet shows whether annual player subs have been paid in respect of each player.</p>	<p>Whilst being a not-for-profit organisation NMWFC must still ensure that income is complete and this is used for credit control and chasing payments due.</p>	<p>The data still needs to be captured and held to efficiently run the club. It is secure on Dropbox.</p>

<p>4) Details of coaches – names, dates of birth, email addresses, telephone numbers and FA numbers – held on Dropbox on Excel.</p>	<p>This information is collated and entered onto WGS to ensure that coaches have the correct safeguards such as first aid training etc. Further information such as telephone numbers and email addresses are vital to ensure communication with coaches and also gets reported to the League.</p>	<p>The data still needs to be held to ensure the FA system is accurate and complete and to ensure the effective running of the club through communications, however coaches need to be aware of what data is held and what is done with it. This will be communicated via the privacy notices and club data protection policy.</p> <p>Details of coaches circulated to other coaches should just be name and contact info. There is no requirement for addresses, dates of birth etc.</p>
<p>5) Information held on prospective joiners on a waiting list: name, address, school year, date of birth and contact email address/telephone number</p>	<p>Information needs to be held in case of a vacancy so places can be offered in order of enquiries made.</p>	<p>Only essential data should be collected and to collect the same data as for registered players is OTT. This information should be limited to child name, guardian contact email address and school year of child.</p>
<p>6) Other information held securely on Dropbox – club insurance policy, club accounts, meeting minutes, newsletters, list of league/club contacts etc.</p>	<p>For a variety of reasons these are all essential for safeguarding, the club’s successful operation and successfully organising the club’s fixtures.</p>	<p>Dropbox is secure and the information is necessary for effective running of the club and safeguarding so no amendments required.</p> <p>Dropbox data held should be deleted in relation to coaches and players other than the current year’s.</p>
<p>7) Details of players for each age group with emergency contacts held by coaches either in hard copy format, stored on a phone or computer.</p>	<p>This is necessary for noting the child’s attendance and a note of contact details must be held in case of emergency.</p>	<p>The guidance from Muckles LLP is as follows:</p> <p>Phone numbers of parents stored in coaches’ phones in case of emergency is fine as long as phones are password protected and they are looked after prudently. Any lists of players in hard copy form should contain as little data as possible: suggestion is child first name plus contact details of next of kin. Any hard copies should be looked after very carefully i.e. not left lying around. If stored on a computer, the computer should be encrypted or</p>

		<p>password protected and again only essential data should be held such as name, email address and next of kin details.</p> <p>An abridged player register containing child full name, next of kin details, email addresses and health conditions will be sent by the Registrations Secretary to each nominated coach at the beginning of the 2020/21 season. Any previous versions held should then be destroyed: deleted on electronic devices and shredded if hard copies</p> <p>No other data should be held by coaches and coaches should confirm this by signing confirmation.</p>
8) Email addresses of parents saved by coaches for communication	It is essential to organise matches and training that coaches email parents/guardians with details.	Email addresses should be guarded safely and all emails to more than one parent should be sent to parents via BCC so their email addresses aren't disclosed. Apps like Teamer or TeamApp are preferable as they are more anonymous and on signing up to a Whatsapp group parents consent to sharing their mobile number.
9) Marketing information sent to parents from a third party, or a third party requests email addresses of parents for marketing purposes	This would be a data breach: parents are not signing up to receiving marketing information and this cannot happen under any circumstances. To receive third party information parents must tick a box to opt in, say on the registration form.	
10) Club newsletters sent to parents at the beginning of or other times of the season	To receive emails of this sort seeking volunteers, providing club information etc parents must opt in.	A box needs to be included on the registration form which should be ticked if parents wish to receive such club communications. Anyone who doesn't opt in should not receive newsletters of this sort.
11) Deletion of player and coach registers no longer required	Data should only be held as long as it is necessary.	At the end of each season details of former players and officials should be deleted. All hard copy player

		<p>registration forms should be shredded once data has been entered onto the spreadsheet and WGS.</p> <p>If a player leaves the club their data should also be deleted as no longer required.</p>
12) Enquiry is made to the club about joining.	Certain data is needed to work out which age group the player would be in.	All enquiries should be made to a secure central email inbox rather than emailed to coaches. Relevant information will be passed to the coaches from there.
13) Misappropriation of player registration forms between filling in by parents and data entry by the Club Secretary.	All forms should be passed directly to the Registrations Secretary on or before the last training day of the season and should be logged by the Registrations Secretary. The log should then be matched to the forms entered onto the Excel spreadsheet. This minimises the amount of people involved in the collection of the data and passing the form by hand (and this being logged) is safer than email which could be hacked.	
14) Photos on the website, Facebook or newsletter	No photos should be published without express written consent from parents and guardians.	The registration form includes a box for parents to consent to photos. Best practice would dictate that it is best to simply avoid photos altogether, but if any are published online or on written or printed material consent must be in place for all of those children included even if they are only in the background.

