



MALMESBURY YOUTH FOOTBALL CLUB  
(FA CHARTER STANDARD DEVELOPMENT CLUB)  
secretary@malmesburyyouthfc.co.uk  
www.malmesburyyouthfootballclub.co.uk



## DATA PROTECTION POLICY

Malmesbury Youth Football Club (MYFC) is committed to ensuring it complies with current Data Protection Law, follows good practice in regard to Data Protection, protects the personal data of members and club volunteers and reviews and updates its procedures and policies from time to time.

The MYFC Registration Secretary is the Data Controller and is responsible for the correct handling of all subject access requests made to the Club in regard to Data Protection. They are also responsible for the implementation of the Breach Procedure described at the end of this document.

All MYFC volunteers are required to read, understand and accept all policies and procedures relating to personal data that they may handle in the course of their MYFC duties.

MYFC ensures that information is:

### 1. Fairly and lawfully processed

MYFC will only request and keep personal details that are necessary for the running of the club ('contractual') and satisfy information required by the relevant FA league. For any other purpose it will obtain consent from the relevant data subjects.

### 2. Processed for limited purposes

Information obtained by MYFC will only be shared with relevant people within the Club or League(s) when required; e.g. medical condition to be shared with the relevant coach.

Basic player information such as gender, name, address and date of birth will be input onto the FA's WholeGame system and shared with the relevant leagues.

This information will not be used in any other way, nor will the Club share any details with a third party.

### 3. Adequate, relevant and not excessive

MYFC will only request the minimum amount of information that is deemed necessary for the running of the club and the safety of its members.



## DATA PROTECTION POLICY

The Registration Secretary is the 'keeper' of all registration data. This includes, but is not limited to, proof of age, parent/guardian contact details, full name, place of residence and medical conditions.

They will only share contact details and medical information (where relevant) with the appropriate coach. The Registration Secretary is required by certain leagues to share basic information such as proof of age, etc. The Child Welfare Officer is the 'keeper' of child welfare data.

The Secretary is the 'keeper' of data relating to accidents.

The Treasurer is the 'keeper' of data required for the running of the MYFC 100 Club as well as bank details. Bank details are used for the purpose of making payments from any of the Club accounts, when required. Bank details and any references are input onto the Club online account and the original information securely destroyed.

The Minutes Secretary is the 'keeper' of the club agendas and minutes.

#### 4. Accurate and up to date

MYFC will ensure that registration information held is updated yearly. This information is updated annually in June when registration forms are sent out to MYFC members. As stated on the Registration Form, the Club may use the information to contact parents/guardians for news, updates, match and event information.

As stated in the 100 Club Welcome Letter it is the responsibility of 100 Club members to contact the Club Treasurer regarding any changes to their contact or bank details.

#### 5. Not kept for longer than is necessary

All registration forms are sent to the Registration Secretary. All data received will be transferred to electronic format; the forms are kept for the remainder of the football season before being destroyed.

The Club will keep any personal data in regard to accidents, child welfare incidents and finance on record solely in order to fulfil their statutory obligations.

The 'keepers' will ensure that electronic data is securely held.

#### Data Retention

The club is required to maintain certain information for a period of time, specifically:-

- Information from registration forms – eighteen months



## DATA PROTECTION POLICY

- Proof of age documentation – after checking, this will be securely shredded
- Child Welfare – any child welfare case file will be kept indefinitely.
- Accident book entries – until a child's 21<sup>st</sup> birthday.
- Health and safety (including club committee minutes) – three years
- Finance – 7 years.
- Length of Service – whilst players are members of the club a record will be maintained of their length of membership.

### 6. Processed in line with your rights

MYFC will ensure that all information gathered is only used for the intended purpose.

### 7. Secure

MYFC will ensure that all information obtained is securely held as per the above heading 'Not kept for longer than is necessary'.

### 8. Not transferred to other countries without adequate protection

MYFC will ensure that no data held by the Club will be shared with anyone or any organisation, regardless of their location, outside of the intended purpose.

### 9. Right of Access

Any request for access to personal data must be in writing and will be passed promptly to the Registration Secretary who will take the necessary steps to verify the identity of those making the request before handing over any information. MYFC reserve the right to charge a reasonable fee for any such request.

### **Breach Procedure**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches can include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;



## DATA PROTECTION POLICY

- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

Any breach must be reported to the MYFC committee without delay. Additionally, a serious breach must be reported to the ICO without undue delay but not later than 72 hours after becoming aware of it (even if we do not know all the details by then). Refer to the breach reporting guidelines ([www.ico.org.uk](http://www.ico.org.uk)) as to the information required by the ICO in regard to a breach

We have in place a process to assess the likely risk to individuals as a result of a breach.

- We have a process to inform affected individuals about a breach when it is likely to result in a high risk to their rights and freedoms.

We know we must inform affected individuals without undue delay and what information about a breach we must provide to individuals, and that we should provide advice to help them protect themselves from its effects.

Therefore we will describe, in clear and plain language, the nature of the personal data breach and, at least:

- the name and contact details of a contact point where more information can be obtained;
- a description of the likely consequences of the personal data breach; and
- a description of the measures taken, or proposed to be taken, to deal with the personal data breach and including, where appropriate, of the measures taken to mitigate any possible adverse effects.

- We document all breaches, even if they don't all need to be reported.