

CASTLE JUNIORS FOOTBALL CLUB



Data Protection and Document Retention Policy - Version 7

1.0 Introduction

1.1 The Club takes its responsibilities under data protection rules - most recently the General Data Protection Regulation (GDPR) - very seriously, recognising that the data we hold includes photographs, bank details and medical information. This policy sets out how we ensure that we abide by the requirements of the legislation, and by our general responsibilities to keep information secure.

2.0 Policy

2.1 The Club collects and processes the information that is required to fulfil the aims and objectives of the club effectively and to fulfil our contractual obligations to club members. We recognise and have built this policy around the general principles of the GDPR including:

- Purpose limitation - we collect the data that is necessary to register members and to allow them to play and coach football, and to allow the club to deliver the services members sign up to receiving when registering with the club
- Data minimisation - we only collect and record the information required to achieve this
- Storage limitation - we hold each piece of data only for the time that we need to hold it, following the guidance set out in this document
- Data accuracy - we will refresh data on a regular basis and take all reasonable steps to delete data that is no longer required
- Integrity and confidentiality - we apply appropriate security (both technical and organisational) to the data that we hold

2.2 The Club has determined that we only hold data to fulfil legitimate interests - allowing our members to play and coach football safely and to develop whilst doing so - and we will not use any of the data we hold for commercial purposes. The only occasions on which we will share any personal data outside the club are:

- Where statutory provisions require us to - this includes the sharing of data with HMRC as regards gift aid claims; with the Irish FA for the administration of the Access NI process; with criminal justice authorities as required where criminal investigations involve club members; or with medical practitioners and first aiders where required for the safety and wellbeing of a club member

- Where it is to enable the registration of teams and players with leagues and other game structures, including the Irish FA Comet online registration system
- Where it is for the effective operation of the club - this including the sharing of player names and squad numbers with our kit suppliers to assist in ensuring the correctness of kit supplies, and player information with the Northern Community Leisure Trust for the provision of discounted memberships for club members. Any such sharing will follow agreement with any third party as to the uses to which the data can be put, and their arrangements for storing and subsequently deleting the data.

2.3 The Club Secretary is nominated as the Club's Data Protection Officer. Any concerns about data breaches, or any Subject Access Requests (SAR), should therefore be addressed to the Club Secretary, who will ensure that appropriate steps are taken, reporting to the Information Commissioner's Office as required, and gathering the information required to respond to an SAR within the statutory timeframe.

2.4 Requests regarding the right to be forgotten (for former club members) should also be addressed to the Club Secretary, who will ensure that all relevant data is removed from club records, to the extent that this is compatible with other statutes including tax legislation and criminal justice legislation.

2.5 The Club Secretary will ensure that any appropriate training and awareness around data protection is undertaken, including seeking advice from the Irish FA as appropriate.

3.0 Data collection

3.1 The Club has identified that we collect and create personal data predominantly through the following forms and processes:

- Player registration form
- Volunteer Agreement Form
- Gift Aid Declaration and Standing Order form
- Player evaluation form

3.2 A data privacy statement is included on the Player Registration Form, Volunteer Agreement Form, Gift Aid Declaration and Standing Order form, and player evaluation form. The Player Registration Form is completed for each player for each season and so will provide a regular reminder to parents and players of the Club's arrangements with regard to data protection as well as opportunity to keep data up to date.

3.3 The specific data that we hold, the arrangements for holding it, and the periods for which we will hold it, are set out in the following section.

4.0 Data storage, retention and disposal

4.1 The arrangements for holding the various types of data are set out below:

4.2 Tax and Financial Records

These include, but may not be limited to, documents concerning standing order and Gift Aid forms (including bank account details and taxpayer status) and other documents concerning the club's receipts and payments. These records will be retained for a minimum of six years from the date of filing the applicable return/ end of the relevant financial reporting period, or any such other period as set down in legislation.

The documents will be held securely by the Treasurer, and any spreadsheets in which the information is collated will be password-protected. Bank account details and Gift Aid Declarations will be held on hard copy forms only, and only accessed by the Treasurer or assistant treasurer for the purposes of HMRC returns or to follow up problems with payments.

The club's accounting records will only reference the names of payees or those from whom funds are received. A master spreadsheet of subscription payments and donations will be managed by the Treasurer and will include tax status of donors. This will be password protected and only accessed by the Treasurer or assistant treasurer for the purposes of recording payments and refunds made, and following up missing payments.

4.3 Volunteer information

For club volunteers, relevant documentation on any recruitment process, declarations by the individuals including on the Volunteer Agreement Form and induction form, and information pertinent to any disciplinary proceedings, will be retained for six years after the volunteer has left the club with the primary record being a hard copy personnel file. These will be held in the Club Office with access restricted to Management Committee members, the Club's Safeguarding Officer and the Club's Volunteer Coordinator. Electronic files which contain personal data on club volunteers will be password protected and only shared within the Club to the extent required for the effective operation of the Club. Volunteers will be asked to complete a new Volunteer Agreement Form every three years.

4.4 Player information

Registration forms

Player registration forms will be kept for the season covered by the form, and one full season thereafter. The contents of the forms will be recorded in a master registration spreadsheet which will be maintained by a Club Management Committee member and password protected. One full season after the end of the current season, the data retained in the spreadsheet will be reduced to player name, date of birth, address and squad number (this being the data required to assert a claim for a share of funds if a player is signed professionally); the other data (including medical information) will be deleted from club records at that point. Players (and their parents if the player is a child) will be asked to complete a new registration form for each season.

Summary player information

A sheet containing contact and medical information for all players and volunteers for a year group/ squad will be shared with volunteers responsible for that year group/ squad, to allow contact to be made with nominated person following any incident/ emergency, and to allow passing of relevant information to medical practitioners or first aiders if required following an incident. The files will be password protected, but their importance in making relevant contacts, and in medical treatment, requires sharing in this way.

Consent forms

Consent forms for visits and trips organised by the club will be retained for one month after the end of the visit and then destroyed, unless they require to be retained to support any investigation into any incident occurring on the visit/ trip.

Evaluation forms

Player evaluation forms may be completed during a player's time with the club. Any such forms will be completed in hard copy in duplicate, with the master copy (often containing a photograph) stored securely in the Club Office and access restricted to Club Management Committee members and Heads of Football. A copy (without a photograph) will be passed to the player/ parent as their record of the evaluation. The forms will make clear that they are not to be converted to digital form, and that the information contained on them is confidential and to be held securely. The master copy will be held for two full seasons after a player has left the club.

Photographic and video imagery

The club recognises that it gathers and uses photographic and video imagery for a variety of purposes. The club further recognises the risks that can arise from unauthorised access to imagery of our players.

Most of the imagery and photographs we hold are not directly connected to the names or other personal data of players. This reduces the risk of misuse. Where, however, a photograph or image is linked to other personal data, the club will take appropriate steps to keep the image and data secure. The situations where this occurs includes:

- Player ID cards for leagues. These will be held securely by coaches for use as required by the league. When they are expired, they will be destroyed or offered to each player to retain
- Player evaluation forms - these will be held securely as set out in this policy
- Images used to upload to the Irish FA COMET online registration system. This system and its security is the responsibility of the Irish FA. The club may, however, use digital images to upload to the system as required by leagues and the Irish FA. Where this is the case, handling of the images will be restricted to those completing the upload functions, and any image which can be identified (for instance by file name) as a named individual will be held on a password protected computer, and will be deleted when use of it is complete.

4.5 Committee and Management Committee and General Meeting Materials

Meeting minutes will be retained in perpetuity in the Club's minute book (this can be electronically, in hard copy or a mixture of both). A clean copy of all committee materials will be kept for no less than three years.

4.6 Press Releases/Public Filings

The Club will retain permanent copies of all press releases and publicly filed documents in the event that the Club needs to test the accuracy of any document a member of the public could produce against the Club.

4.7 Legal Files

In the event of any legal proceedings involving the Club, legal advice will be sought to determine the retention period of particular documents. Legal documents will generally be maintained for a period of ten years.

4.8 Contracts and Agreements

Final, execution copies of all contracts and agreement entered into by the Club will be retained. The Club will retain copies of the final contracts and agreements for at least three years beyond the life of the agreement, and longer in the case of publicly filed contracts.

4.9 Electronic Mail / Other Electronic Documentation

E-mail or electronic documentation that needs to be saved will be either:

- be printed in hard copy and kept in the appropriate file; or
- be downloaded to a computer file and kept electronically or on disk as a separate file

Cloud Storage is an acceptable means for the retention of electronic correspondence or documents.

The retention period of the electronic communication depends upon the subject matter of the e-mail or document, as covered elsewhere in this policy.

Relevant Club officials will be provided with a Club email account, which they will be expected to use for all Club-related emails, and which will allow appropriate storage and archiving of electronic communications. Club officials will ensure that all such accounts are password protected and that personal data is only shared as required to meet statutory provisions or to support the effective operation of the club. Club officials will periodically review file and email holdings to reduce holdings of personal data whilst meeting these needs.

Signed:

Trevor Reid

Iain Greenway

**TREVOR REID
CHAIRPERSON**

**IAIN GREENWAY
TREASURER**

Date: 31 January 2022

Version	Date	Changes
1	August 2016	
2	January 2018	Minor changes to maintain consistency with other policies
3	May 2018	Update for GDPR
4	March 2019	Refinements in light of IFA GDPR guidance and changes to Management Committee positions
5	August 2019	Updates for handling of photos and player evaluations
6	January 2020	Amendments to details around player evaluation forms
7	January 2022	Minor changes to maintain consistency with other policies