



## **Football Beyond Borders: GDPR Assurance Letter for our Partner Schools**

To whom it may concern,

This letter sets out the steps we have taken to ensure that we are compliant with the General Data Protection Regulations (GDPR). As a service provider and data controller, Football Beyond Borders prides itself on having the highest standards of data management and security. We operate within UK and EU legislative guidelines and we have completed a full review to ensure Football Beyond Borders fully complies with the GDPR.

Much of the GDPR builds on the current Data Protection laws with which Football Beyond Borders is compliant. However, GDPR does bring in some changes that affect both Football Beyond Borders and our partner schools. As a result of these changes in 2018, we conducted a full GDPR Readiness Review to identify areas of our practice that need to change in accordance with GDPR. We made the following changes in advance of GDPR coming into effect on 25<sup>th</sup> May 2018. These changes included:

- Improving the ability of Football Beyond Borders to erase personal data of an individual, or in most cases the pseudonymisation of a participant to a sufficient degree to still allow anonymous reporting on data associated with that attendee;
- Ensuring personal data can be supplied in a machine-readable form for data portability – while this is already possible through Excel spreadsheets, we continue to be committed that this meets GDPR requirements;
- Ensuring mechanisms for how personal consent is sought, recorded and managed throughout Football Beyond Borders is GDPR compliant;
- Appointing our Director, Jack Reynolds, as our Data Protection Officer;
- Ensuring that all of our sensitive data is stored securely on either a) password protected, GDPR compliant data processing sites; or b) in locked cabinets with restricted key holders;
- Receiving and reviewing GDPR statements from all of our partners who are responsible for processing our data;
- Delivering GDPR awareness training to our staff team and volunteers;
- Amending our consent form to ensure informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- Establishing a Finance, Governance and Risk Committee (FGRC) to ensure full GDPR compliance, with the provision of an appropriate GDPR readiness assessment and audit.

In addition, we created a number of additional internal policies and procedures to ensure that we continue to be GDPR compliant. This includes:

- A Data Retention Policy;
- A simple and transparent process to allow for subject-access requests;
- A Data Protection Impact Assessment;
- A Data Asset Register.

These policies are reviewed on an annual basis, along with our methods of gathering personal data, to ensure any changes in legislation are reflected in these processes.

We also shared a document with our partner schools called Data Processing Obligations, a legal agreement between Football Beyond Borders and any schools where we delivered our programmes, as to the way we process your data. This, eventually, became part of the Service Level Agreement sent to schools, ahead of the academic year beginning again.

Finally, we reviewed the lawful basis and condition for processing the data of our participants. The crucial article of the GDPR with regards to our work is Article 4 (11) which defines consent as “any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.”

As a result of this provision, we reviewed our participant consent forms and will be issuing revised versions at the beginning of each academic year. This consent form will be based on the principles that:

- Consent must be voluntarily given
- Consent must be specific, informed and unambiguous
- Consent must be able to be refused with alternative processes on offer
- Consent for data must be clearly distinguishable from the other matters
- Individuals should be clear as to exactly what they are signing up to
- Individuals must be able to revoke consent at any point with procedures in place to allow for this

Our consent forms will also provide participants with information on the data we will collect and store on them, why that has been collected and for how long it will be stored for.

We reviewed our data requests from our partner schools to ensure that we request the minimum amount of data necessary to safely and effectively perform our organisational duties. The minimum data required for Football Beyond Borders to safely and effectively perform our organisational duties is:

- Parental contact details
- Participant postcode
- Participant date of birth
- Participant ethnicity
- Participant UPN
- Participant SEN status
- Participant FSM6 eligibility
- Participant school behaviour points
- Participant school attendance
- Participant exclusion record
- Control group anonymised behaviour points
- Control group anonymised school attendance
- Control group anonymised exclusion record

These data points are reflected in our internal Information Asset Register.

Yours sincerely,

Jack Reynolds  
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