

GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

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Policy owner / Data Protection Lead	Muhammad Saad Rafiq
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1. About this Policy

- 1.1 This policy supports **London Grassroots Sports C.I.C.** (“we”, “us”, or “the Organisation”) in meeting its data protection obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It applies to all directors, employees, contractors, volunteers, coaches and anyone else who handles personal data in any capacity while working with or for the Organisation.
- 1.2 We process personal data relating to current, former and prospective participants, parents and guardians, staff, volunteers, board members, coaches, referees, contractors, suppliers, funders and other third-party contacts.
- 1.3 You may process personal data on our behalf, and we may process data about you. All personal data must be handled lawfully, fairly, transparently and securely.
- 1.4 Handling personal data properly protects individuals’ rights and maintains trust in our Organisation. This policy sets out the responsibilities and expectations for everyone working with or representing us.
- 1.5 You must comply with this policy and any related procedures when processing personal data on our behalf. Failure to do so may lead to disciplinary action or, for volunteers and contractors, termination of your engagement.
- 1.6 Responsibility for ensuring compliance lies with **management and the Data Protection Lead**. Questions should be directed to:

Data Protection Lead	Muhammad Saad Rafiq
Email	ops@londongrassrootssports.com

- 1.7 We process personal data for purposes including (but not limited to): administering club and team affiliation; registering players and confirming eligibility; organising fixtures, results and league tables; collecting and administering payments such as affiliation, registration and entry fees; running disciplinary and misconduct processes; safeguarding; communication and marketing; managing volunteers and match officials; and affiliation, monitoring and reporting to the relevant football authorities.
- 1.8 We retain personal data for no longer than necessary. Retention periods are set out in Section 12. Data is kept longer only where legal, regulatory, funding or safeguarding reasons require it.

- 1.9 Failure to provide necessary personal data may affect our ability to deliver a service or fulfil a contract, or to keep a participant safe.
- 1.10 You must familiarise yourself with the key definitions and principles set out in Sections 3 and 4.

2. What We Need from You

- 2.1 You are required to comply with this policy and to help us meet our data protection responsibilities. In particular, you must:
- 2.1.1 Only process personal data in line with our **Privacy Notice** and for the purposes it was collected.
 - 2.1.2 Not collect unnecessary or excessive data.
 - 2.1.3 Keep data accurate and update inaccurate data promptly.
 - 2.1.4 Follow retention schedules and securely dispose of data that is no longer needed.
 - 2.1.5 Keep data secure — password-protect digital files and lock away physical files.
 - 2.1.6 Not use unapproved IT systems, apps or personal devices to hold Organisation data without approval.
 - 2.1.7 Not share personal data externally unless authorised to do so.
 - 2.1.8 Immediately report any request from an individual to exercise their rights (access, correction, erasure, etc.).
 - 2.1.9 Report all suspected or actual data breaches without delay (see Section 14).
 - 2.1.10 Complete any data protection training provided and follow any related procedures.

3. Key Definitions

So that this policy is applied consistently, the following terms are used throughout:

Term	Meaning
Personal data	Any information relating to an identified or identifiable living individual.
Special category data	Sensitive data such as health, ethnicity, religious beliefs, sexual orientation or biometric data, which receives extra protection.
Processing	Any action performed on personal data — collecting, storing, using, sharing, deleting, etc.
Data subject	The individual whom the personal data is about.
Data controller	The organisation that decides how and why personal data is processed (this is us).
Data processor	A third party that processes personal data on our behalf, such as a booking or payment platform.

4. Data Protection Principles

Under the UK GDPR, all personal data must be:

- 4.1 **Processed lawfully, fairly and transparently.**
- 4.2 **Collected for specified, explicit and legitimate purposes** and not used in incompatible ways.
- 4.3 **Adequate, relevant and limited** to what is necessary.
- 4.4 **Accurate and kept up to date.**
- 4.5 **Retained only as long as necessary.**
- 4.6 **Processed securely**, protecting against unauthorised or unlawful access, loss or damage.

We must be able to demonstrate compliance with all of these principles — this is known as the **accountability** principle.

5. The Personal Data We Process

5.1 Depending on a person's relationship with us, we may process:

- **Registered players (via member clubs):** names, dates of birth, contact and emergency contact details, registration and eligibility information, relevant injury or medical information, and photographs and video (with consent).
- **Club officials, team managers, coaches and volunteers:** contact and role details, qualifications, references, DBS check outcomes and safeguarding training records.
- **Match officials and referees:** contact details, registration and appointment information.
- **Contacts, suppliers, funders and football authorities:** names, roles and business contact details.

5.2 Some data is "special category" or safeguarding-related and receives extra protection (see Sections 6 and 7).

5.3 **Club and team data:** we hold registration and contact details for our member clubs and teams and their nominated officials (for example club secretaries and team managers).

5.4 Member clubs are responsible for ensuring they have a lawful basis to provide their players' personal data to us, for keeping that data accurate, and for passing on the relevant privacy information to their players and parents/carers.

5.5 Team sheets, squad lists and player registration details may be shared with match officials, opposing clubs and the relevant football authorities for the purposes of organising fixtures, confirming player eligibility and running disciplinary processes.

5.6 **Payment data:** we hold records of payments — such as the payer's name, amount, date, reference and method (for example bank transfer, direct debit or card). Where payment is made by bank transfer, limited bank account details may appear on our systems or on invoices, which we hold securely. Card payments are handled by our payment providers, and we do not store full card numbers ourselves (see Section 10).

6. Lawful Bases for Processing

6.1 We always identify and record a lawful basis before processing personal data. We rely on the following bases:

Lawful basis	Typical use
Consent	Marketing; use of photographs and video; optional activities.
Contract	Administering club affiliation, league participation and related payments (e.g. affiliation and registration fees).
Legal obligation	Safeguarding; health and safety; employment, tax and accounting duties.
Vital interests	Responding to a medical emergency, for example an injury at a fixture.
Legitimate interests	Running the league competition — player registration, fixtures, results and discipline — balanced against individuals' rights.

6.2 For **special category data** (such as health, dietary or allergy information) and **criminal offence data** (such as DBS outcomes), we identify a lawful basis *and* a valid additional condition under Article 9 or 10 of the UK GDPR and Schedule 1 of the DPA 2018 — typically vital interests, safeguarding, or explicit consent. We apply extra safeguards such as restricted access, encryption and pseudonymisation.

6.3 Where we rely on consent, individuals may withdraw it at any time. This does not affect the lawfulness of processing carried out before withdrawal.

7. Children's and Young People's Data

- 7.1 Because our activities involve children and young people under the age of 18, we take particular care with their personal data.
- 7.1.1 Where consent is relied upon, we obtain consent from a person with parental responsibility for any participant under the age of 18.
 - 7.1.2 We provide privacy information for children in clear, age-appropriate language.
 - 7.1.3 We collect the minimum data necessary and never use children's data in ways they would not reasonably expect.
 - 7.1.4 Safeguarding always takes priority. Where there is a safeguarding concern, relevant information may be shared with the appropriate authorities in line with our safeguarding policy, including without consent where necessary.

8. Rights of Data Subjects

- 8.1 Individuals have the right to:
- Be informed about how their data is used.
 - Access their personal data (a "subject access request").
 - Request rectification of inaccurate or incomplete data.
 - Request erasure ("the right to be forgotten") in certain circumstances.
 - Restrict processing in certain circumstances.
 - Data portability.
 - Object to processing, including for direct marketing.
 - Withdraw consent at any time.
- 8.2 All requests must be reported to the Data Protection Lead **immediately**, as there are statutory timeframes for response. We respond without undue delay and within **one calendar month**. We may verify identity before releasing information and may refuse or charge a fee for manifestly unfounded or excessive requests.

9. Photography, Video and Marketing

- 9.1 We only take and use photographs or video of participants where appropriate consent has been given, and (for children) consent from a person with parental responsibility.
- 9.2 Individuals can withdraw photography or marketing consent at any time, and we stop using new material accordingly.
- 9.3 Marketing communications are only sent where we have a lawful basis, and every message offers a clear way to opt out.

10. Data Sharing, Third Parties and International Transfers

- 10.1 We do not sell personal data. We only share data where there is a lawful basis, for example with The Football Association and the relevant County FA, other leagues (for example when a player transfers), referees' associations, funders and local authorities for monitoring and reporting, and safeguarding, health or emergency services where necessary to protect an individual.
- 10.2 Where a third party processes data on our behalf (a "processor" — such as IT, league administration, results and fixtures, or communication providers), we put a written contract in place requiring them to protect the data, act only on our instructions and meet our security standards.
- 10.3 We take payments through third-party payment providers — including Stripe, GoCardless and EEUQ — which handle card and bank details directly under their own terms and security standards (including PCI DSS where applicable). For card payments we receive only limited information, such as confirmation of payment

and the payer's details, and do not store full card numbers ourselves. Where payment is made by bank transfer, some bank account details may appear on our systems or invoices, and we hold these securely.

10.4 If personal data is transferred outside the UK, we ensure an appropriate safeguard recognised under UK data protection law is in place before the transfer takes place.

11. Data Security

11.1 We take appropriate technical and organisational measures to keep personal data secure, including:

- Storing electronic data on password-protected, access-controlled systems and reputable cloud services.
- Restricting access to those who need it for their role.
- Keeping paper records in locked storage.
- Using encryption and secure transfer methods where appropriate.
- Using reputable payment providers for card payments, and holding any bank account details securely.
- Securely deleting or destroying data that is no longer needed.

12. Data Retention

12.1 We keep personal data only for as long as necessary for the purpose it was collected, or to meet legal, football authority, accounting or safeguarding requirements. As a general guide:

Record type	Indicative retention period
Club and team affiliation records	Duration of affiliation plus 3 years
Player registration and eligibility records	Current season plus 3 seasons, in line with football authority rules
Match official and referee records	Duration of engagement plus 3 years
Disciplinary and misconduct records	In line with The FA / County FA regulations
Safeguarding and incident records	In line with statutory safeguarding guidance
Financial and payment records (e.g. fees, fines)	6 years after the relevant financial year
Marketing consents	Kept until withdrawn, and reviewed at least every 2 years

12.2 When data reaches the end of its retention period it is securely deleted or anonymised.

12.3 Published competition information, such as fixtures, results and league tables, may be retained as a historical record of the competition.

13. Accountability

13.1 **Data protection by design and default:** we consider data protection whenever we introduce a new activity, system or supplier, and build in privacy from the start.

13.2 **Data Protection Impact Assessments (DPIAs):** we carry out a DPIA before any processing that is likely to result in a high risk to individuals' rights, such as large-scale or new uses of children's data.

13.3 **Records of processing:** we maintain records of our processing activities so we can demonstrate compliance.

14. Data Breaches

14.1 A personal data breach is any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

14.2 If you suspect a breach, you must:

14.2.1 **Immediately report it** to the Data Protection Lead.

14.2.2 Not attempt to investigate or contain it yourself unless instructed.

14.3 The Data Protection Lead will assess every breach and, where necessary: report it to the ICO **within 72 hours**; notify affected individuals where there is a high risk; and record the incident in our breach log. All breaches are logged, whether or not they are reportable.

15. Roles and Responsibilities

15.1 **The Board of Directors** holds overall accountability for data protection compliance.

15.2 **The Data Protection Lead** oversees day-to-day compliance, handles rights requests and breaches, and maintains this policy and related records.

15.3 **All staff, volunteers and coaches** are responsible for handling personal data in line with this policy.

16. Training and Awareness

16.1 All staff and volunteers receive data protection guidance as part of induction and at regular intervals appropriate to their role.

16.2 Additional guidance is provided to anyone handling special category, safeguarding or children's data.

17. Privacy Notice and Policy Access

17.1 Our **Privacy Notice** (available on our website and in programme materials) explains how and why we collect personal data.

17.2 This policy is available to all staff, volunteers and partners and is reviewed during induction and annually.

18. Complaints

18.1 If you have any concern about how we handle your personal data, please contact our Data Protection Lead in the first instance:

Data Protection Lead	Muhammad Saad Rafiq
Email	ops@londongrassrootssports.com

18.2 We will acknowledge your complaint and respond as quickly as possible.

19. Policy Review

19.1 This policy is reviewed at least annually, or sooner in response to legal, operational or structural changes, or new guidance. All staff will be notified of updates.

Approval

Approved by: Maria Fernanda Bermudez Rahman

Position: Director

Date approved: 7 April 2026

Review due: 7 April 2027

Data Protection Lead: Muhammad Saad Rafiq, ops@londongrassrootssports.com