



District Sports

GDPR Data Protection Policy

Aims

District Sports aims to ensure that all personal data collected about staff, children, parents, and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018), as set out in the Data Protection Bill.

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Legislation and guidance

This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests.

It also reflects the ICO's code of practice for the use of surveillance cameras and personal information.

The data controller

District Sports processes personal data relating to parents, children, staff and others, and therefore is a data controller.

Roles and responsibilities

This policy applies to **all staff** employed by District Sports, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing District Sports of any changes to their personal data, such as a change of address
- Contacting the manager in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure.
 - If they have any concerns that this policy is not being followed.
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way.

Email – admin@districtsportssouth.com

Mobile – 07858 904422

Website – www.districtsportssouth.com



- If they need to rely on or capture consent, draft a privacy notice or deal with data protection rights invoked by an individual.
- If there has been a data breach.
- Whenever they are engaging in a new activity that may affect the privacy rights of individuals.
- If they need help with any contracts or sharing personal data with third parties.

Data protection principles

The GDPR is based on data protection principles that District Sports must comply with. The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Accurate and, where necessary, kept up to date
- Processed in a way that ensures it is appropriately secure

This policy sets out how District Sports aims to comply with these principles.

Collecting personal data

Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- The data needs to be processed so that District Sports can fulfil a contract with the individual, or the individual has asked District Sports to take specific steps before entering into a contract
- The data needs to be processed so that District Sports can comply with a legal obligation
- The data needs to be processed to ensure the vital interests of the individual e.g. to protect someone's life
- The data needs to be processed so that District Sports, as a public authority, can perform a task in the public interest, and carry out its official functions
- The data needs to be processed for the legitimate interests of District Sports or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/carer when appropriate in the case of a child) has freely given clear consent

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.

Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

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If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs.

When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised.

Sharing personal data

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a child or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our parent carers, children or staff.

Should we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Training

All staff are provided with information about data protection as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or District Sports processes make it necessary.

This policy was adopted by: District Sports	Date: 01/06/2024
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To be reviewed: July 2025

Signed: Tom Pugh