



Dawley Wanderers FC Data Protection Policy



Version History

Version	Date	Description of Change	Approved By
0.1	15/10/2025	Initial Draft - Subject to share and review with the club committee.	L. Marini (DPO)
1.0	17/10/2025	Major Data Protection Compliance Update: Strengthened member data rights across the lifecycle. Key changes focus on: Privacy Notices at collection; securing Explicit Consent for health/special category data; clarifying essential Third-Party Data Sharing ; establishing Data Transfer Safeguards ; outlining Consent Withdrawal rights; implementing mandatory Staff Training ; formalizing Complaint Handling (including the ICO); and defining secure Data Destruction and Policy Accessibility procedures.	L.Marini (DPO) J.Lowe (Chair) M.Bell (Welfare) D.Wood (Secretary)



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1. Introduction and Purpose

This policy is to ensure **Dawley Wanderers FC** (the "Club") complies with the relevant data protection legislation (UK GDPR and the Data Protection Act 2018).

The Club holds and processes personal data about its members, including players, coaches, volunteers, and parents/guardians. The proper and lawful handling of this information is vital to the Club's operations and for maintaining the trust of its members.

2. Scope

This policy applies to all personal data collected, stored, and processed by the Club, regardless of the format (electronic or paper) and applies to all club officials, volunteers, coaches, and managers.

3. Data Protection Officer (DPO)

The Club has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with data protection legislation and this policy.

DPO Contact Details:

- **Name:** Leonardo Marini
- **Email:** dataprotection@dawleywanderers.com
- **Phone:** 07500144288

DPO Key Responsibilities:

- To act as the primary point of contact for all data protection matters.
- To manage and coordinate the Club's response to all individual requests for data (Subject Access Requests).
- To be involved in the creation, maintenance, and mandatory annual review of this Data Protection Policy.
- To advise on Data Protection Impact Assessments (DPIAs) where required.
- To liaise with the relevant supervisory authority (the ICO in the UK) if necessary.

4. Principles of Data Processing

The Club is committed to processing data in accordance with the data protection principles, ensuring data is:

1. **Lawfully, fairly, and transparently** processed.
2. Collected for **specified, explicit, and legitimate purposes**.



3. **Adequate, relevant, and limited** to what is necessary.
4. **Accurate** and, where necessary, kept **up to date**.
5. Kept in a form which permits **identification for no longer than is necessary**.
6. Processed in a manner that ensures **appropriate security** of the personal data.

5. Types of Data Collected

The Club collects and processes personal data, which may include:

- **Identity Data:** Names, addresses, dates of birth, contact details (phone numbers, email).
- **Health Data (Special Category Data):** Medical conditions, allergies, relevant injury history (only collected with explicit consent for the purposes of health and safety during training/matches). For children, parental/guardian consent will be required.
- **Membership Data:** Registration forms, team sheets, emergency contact information, photography/video consent.
- **Financial Data:** Bank details (for processing payments/refunds, if applicable).
- **Communication Data:** Records of communications (emails, text messages, app messages) between the Club and members.

6. Lawful Basis for Processing

The Club primarily relies on the following lawful bases for processing personal data:

- **Contract:** Processing data necessary for the fulfilment of a contract (e.g., membership registration and providing football-related services).
- **Legitimate Interests:** Processing necessary for the Club's legitimate interests (e.g., effective administration, safeguarding, and communication with members).
- **Legal Obligation:** Processing necessary to comply with a legal obligation (e.g., FA or League registration requirements).
- **Consent:** Explicit consent will be obtained for processing Special Category Data (e.g., health data) and for non-essential activities (e.g., use of photographs/videos).

7. Individual Rights (Subject Access Requests - SARs)

Individuals have the right to access personal data the Club holds about them.

SAR Procedure:

1. Submit a request in writing (email or letter) to the DPO.
2. Identity Verification:
 - Adults: Mandatory in-person identity verification.



- Children: Parent/guardian must provide proof of identity and parental responsibility.
- 3. Scope of Request: All relevant records and communications will be retrieved.
- 4. Redaction: Third-party data will be redacted unless consent is provided.
- 5. Response: Data will be provided free of charge within one month of verification.

Other Rights:

- Right to rectification, erasure, restriction, objection, and data portability.
- Consent can be withdrawn at any time by contacting the DPO.

8. Privacy Notices

The Club provides a clear privacy notice at the time of data collection. This notice includes:

- Purpose of processing
- Lawful basis for processing
- Retention periods
- Individual rights

Privacy notices are available on the Club's website and in hard copy on request.

9. Data Sharing and Transfers

- Personal data may be shared with third parties where necessary for football services (e.g., FA, League registration, tournament organisers, external coaches).
- Sharing is limited to the minimum necessary data.
- If data is transferred outside the UK or EEA, appropriate safeguards (standard contractual clauses or approved mechanisms) will be used.

10. Individual Rights (Subject Access Requests - SARs)

Individuals have the right to access the personal data the Club holds about them. This is managed by the DPO.

Procedure for a Subject Access Request (SAR):

1. **Submission:** A request must be made in writing (email or letter) to the DPO.
2. **Identity Verification:**
 - The DPO will arrange a **mandatory in-person meeting** with the individual to verify their identity.



- For requests concerning a child (under 18), the individual making the request must provide **in-person proof of parental responsibility** (e.g., a birth certificate or court order) and proof of their own identity.
- 3. **Scope of Request:** The DPO will retrieve all personal data concerning the individual. This includes:
 - All stored records (registration forms, notes).
 - **All communications** (emails, text messages, messaging apps/group chats, etc.) where the individual is the subject or a participant.
- 4. **Redaction:** The DPO will review the retrieved data and redact (black out) any information not relevant to the individual or any data belonging to a third party (unless consent is provided or the information is necessary).
- 5. **Response:** The Club will provide the data free of charge and within one month of receiving the request and verifying the identity of the requester.

11. Data Security and Storage

- **Storage:** Personal data will be stored securely.
 - **Electronic Data:** All electronic data, including scanned copies of general personal records and the digital record of DBS check details, will be **password-protected** and stored in an **encrypted, access-restricted location**.
 - **Paper Records:**
 - **Players List and Medical Conditions (The Approved Exception):** Each manager responsible for a team's list must ensure these documents are stored securely **under lock and key** (e.g., in a locked filing cabinet or drawer) when not in immediate use. *[Note: This is required as the list contains personal information and is exempt from the "scan and destroy" rule.]*
 - Any other temporary paper records containing personal information must be **scanned and immediately shredded/destroyed**, adhering strictly to the principle of "scan and destroy."
- **Access:** Access to personal data is restricted to relevant club officials, managers, and the DPO on a need-to-know basis.
- **Data Breach:** In the event of a suspected or actual data breach (e.g., loss, theft, or unauthorised access), the DPO must be notified immediately. The DPO will assess the risk and, if necessary, report the breach to the ICO within 72 hours.

Note: The organisation's record of the DBS check must only contain the minimum necessary information (e.g., certificate number, date, and recruitment decision)—**not** a copy of the full certificate.



12. Retention and Secure Deletion

Personal data will only be kept for as long as is necessary for the purposes for which it was collected.

- **Membership Data:** Retained for the duration of the member's association with the Club, plus 12 months after they leave, in case of disputes or legal requirements.
- **Financial Records:** Retained for 6 years to comply with tax and accounting rules.
- **Accident/Injury Records:** In case the injured person was an ADULT at the time of the incident the records will be retained for at least 6 years since the incident happened. For an injury sustained while the person was a minor (under 18), the data must be retained until they reach their 21st birthday.
- **Secure Deletion:** Electronic data securely deleted; paper records shredded when retention period ends.

13. Complaints Procedure

If an individual believes their data rights have been infringed:

1. Raise a complaint with the DPO.
2. If unresolved, contact the ICO.

14. Data Protection Awareness and Policy Enforcement

All club officials, coaches, and volunteers with access to personal data will be required to read and comply with this Data Protection Policy.

The Club commits to ensuring all relevant personnel are aware of their data protection obligations by:

- Providing a copy of this Data Protection Policy and making it easily accessible at all times.
- Offering clarification and guidance on the Policy's provisions when requested by officials or volunteers.
- Mandating that all personnel are responsible for the strict enforcement of the data handling principles, secure data practices, and breach reporting procedures outlined in this Policy.

15. Policy Review

This Data Protection Policy will be reviewed and updated by the DPO and the Club Committee at least **once per season** before the start to ensure it remains accurate and compliant with current legislation.