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Data Protection & Information Sharing Policy

Maldon & Tiptree Football Club | Approved

Chairman	**Jamil Trofder**
Club Secretary & Welfare Officer	Garry Neave-Houghting
Safeguarding contact	garry.mtfc@gmail.com | 07538 973069
Status / review	Approved • November 2026 • Review by November 2027

1. Purpose and scope

The club is committed to handling personal information lawfully, fairly, transparently and securely, while enabling appropriate safeguarding information sharing. This policy applies to directors, employees, coaches, managers, volunteers, contractors and anyone processing information on the club's behalf.

It covers information about players (including under-18s), parents/carers, adults at risk, supporters, match officials, staff, volunteers, applicants, visitors and commercial contacts, in paper, digital, image, audio and video formats.

This policy should be read with the club's safeguarding, social media, photography and filming, equality, complaints and disciplinary procedures.

2. Legal framework and principles

The club will comply with the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, applicable Privacy and Electronic Communications Regulations (PECR), and relevant FA/County FA and league requirements.

Personal data must be: processed lawfully, fairly and transparently; collected for specified purposes; adequate and limited to what is needed; accurate; kept no longer than necessary; secured against unauthorised access, loss or disclosure; and processed with demonstrable accountability.

An appropriate lawful basis must be recorded for each processing purpose. Consent is not automatically required or appropriate for every use of personal data. Additional conditions and safeguards are required for special-category data, such as health information, and criminal-offence data.

3. Governance and responsibilities

The club's management is responsible for approving privacy procedures, providing resources, assigning an operational data protection lead, maintaining the data inventory and retention schedule, and reviewing compliance. Chairman: Jamil Trofder.

The Club Welfare Officer, Garry Neave-Houghting, is the safeguarding point of contact; this does not automatically make him the club's data protection officer. The club must separately designate and publish an appropriate general data protection contact.

Every person with access to club information must complete relevant induction/training, use approved systems, maintain confidentiality and promptly report suspected breaches or inappropriate requests.

4. What the club collects and why

Typical records include registration and eligibility details, parent/carer and emergency contacts, attendance, fixtures, coaching and disciplinary records, medical and accessibility needs, safeguarding concerns, DBS eligibility/status (not unnecessary certificate copies), photographs and filming, payments, ticketing and website communications.

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The club must provide clear privacy information describing purposes, lawful bases, recipients, retention, individual rights, and any international transfers. Collect only what is necessary and verify information periodically.

Health, safeguarding and other sensitive records must be strictly restricted to personnel with a genuine need to know and must not be kept in general team-chat groups.

5. Children and adults at risk

Use age-appropriate privacy notices and explain how information will be used. Where consent is the lawful basis, obtain valid consent from the appropriate person; parental permission may also be needed for participation, photography or safeguarding arrangements under relevant club/FA rules.

Do not publicly disclose home addresses, medical details, safeguarding histories, school details or live locations of under-18s. Apply additional precautions where an individual is subject to a protection order or is otherwise at heightened risk.

Respect adults' autonomy, capacity and wishes. Where capacity is in question, follow the Mental Capacity Act 2005 and seek appropriate specialist advice; do not assume that a disability removes decision-making capacity.

6. Safeguarding information sharing

Where a child or adult may be at risk of harm, the club will share relevant, accurate and proportionate information promptly with appropriate statutory safeguarding agencies, police, The FA/Essex FA or other authorised bodies, where there is a lawful basis and the disclosure is necessary.

Consent is not always required before a safeguarding referral, particularly where seeking it could increase risk or prejudice an investigation. Record the reason for sharing or withholding information, who received it, when and by what secure means.

Do not promise absolute secrecy. Limit disclosure to those who need to know; keep contemporaneous factual records and avoid conducting an independent investigation into suspected abuse. For immediate danger call 999.

7. Information security and access

Use approved password-protected accounts, strong unique passwords, multifactor authentication where available, device locks, encrypted transfer/storage where appropriate, role-based permissions and secure backups.

Do not use personal email, unapproved cloud drives or informal messaging to circulate safeguarding files or medical information. Verify recipients before sending, use BCC for group messages where appropriate, and report lost devices immediately.

Paper records must be stored securely and transported only when necessary. Remove access promptly when staff or volunteers leave or change roles.

8. Photography, filming, CCTV and digital channels

Follow the club Photography and Filming and Social Media policies. Explain the purpose, lawful basis, audience and retention of images; respect relevant objections, restrictions and safeguarding risks. Avoid identifiable images of protected individuals.

Where CCTV is operated, use appropriate signage, documented purposes, controlled access, limited retention and a process for access requests. Do not record audio unless specifically justified and lawful.

Only authorised personnel may post on club channels. Do not publish medical, safeguarding or confidential disciplinary information.

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9. Sharing with external organisations and suppliers

Only share data with The FA, Essex FA, league bodies, education providers, insurers, healthcare professionals, police, social care or suppliers when justified and proportionate. Record whether each party acts as an independent controller, joint controller or processor.

Put compliant written processor agreements in place where required; assess supplier security and international transfers; share by secure channels and keep an appropriate disclosure log.

10. Retention and disposal

Keep a documented retention schedule by record type, legal requirement and safeguarding need; do not apply one blanket deletion period to all records. Safeguarding records may require extended retention and must not be destroyed while an investigation, claim or preservation requirement is ongoing.

Periodically review records and securely delete or shred them when no longer required. The illustrative schedule below must be approved and adapted after legal/FA advice.

Illustrative retention review schedule (not fixed legal periods)

Record	Review approach
General player registration	Review annually; retain only for defined administration, insurance and legal needs.
Medical / emergency contacts	Review each season and after changes; securely remove obsolete copies.
Safeguarding case records	Restricted file; retain under applicable safeguarding/FA and legal guidance; no routine early deletion.
CCTV	Short, documented retention unless needed for incident or investigation.
Marketing contacts	Keep while lawful and needed; honour unsubscribe/objections promptly.

11. Individual information rights

People may have rights to access, rectify, erase, restrict or object to processing, and to data portability, subject to applicable exemptions. Provide a clear contact route and verify identity proportionately.

Log requests immediately and ordinarily respond to subject access requests within one calendar month, subject to lawful extensions or exemptions. Safeguarding information and third-party personal data require careful review before disclosure.

Individuals may complain to the Information Commissioner's Office (ICO) at ico.org.uk.

12. Data breaches and incident response

Anyone who discovers loss, misdirection, unauthorised access, accidental disclosure, ransomware or another suspected personal data breach must immediately notify the club's designated data protection lead and, where safeguarding information is involved, the Club Welfare Officer.

The club must contain the incident, preserve evidence, assess risk to individuals, document decisions and take corrective action. If the breach is likely to risk individuals' rights and freedoms, notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware. If high risk, inform affected individuals without undue delay unless a legal exception applies.

Escalate safeguarding or criminal concerns to appropriate authorities without waiting for the data-breach assessment to finish.

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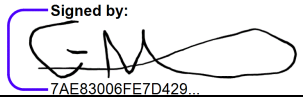
13. Training, monitoring and review

Provide proportionate privacy and security training at induction and refresh it regularly. Review access rights, processor arrangements, incident trends, privacy notices and this policy at least annually or after significant changes in law, technology or club operations.

Non-compliance may result in corrective action, disciplinary measures, contract termination or referral to the appropriate regulator or authority.

Approval and sign-off

This policy takes effect only when formally approved by Maldon & Tiptree FC. Confirm the named data protection contact, retention schedule and operational arrangements before publication.

Approver	Signature	Date
Jamil Trofder — Chairman		12th November 2026
Garry Neave-Houghting — Club Secretary & Welfare Officer		12 November 2026

Reference guidance: The FA safeguarding guidance and current ICO guidance (ico.org.uk). This is a club draft aligned to relevant principles, not an FA-issued or FA-certified policy.