Data Protection Manual

This document sets out the Data Protection Policy and Procedures and provides points of contact for further enquiries.

Contents:

Page 2 - Introduction and Overview

Page 3 - Policy

Page 7 - Procedure – Subject Requests

Page 9 - Procedure – Overseas Transfer

Page 10 - Procedure – Breach Handling

Page 11 - Contacts

Page 12 - Template for Privacy Notice

Page 17 - Template for Data Inventory and Impact Assessment

# Introduction and Overview

People have ownership rights over their information, and we must abide by those rights. We must follow certain rules about how we collect, store, use and dispose of personal data. This Data Protection Manual outlines our obligations under the law, sets out a Policy about how we fulfill those obligations, and provides Procedures that we follow in order to comply with our Policy.

We are a “Controller”, responsible for the protection of the personal data held by us under the Data Protection (Bailiwick of Guernsey) Law, 2017 (“the Law”). This essentially mirrors the EU requirements (and therefore those for the UK) regarding the safety and handling of “personal data” and “special category data” only. The Guernsey law came into effect on 25 May 2018.

Personal data includes:

* Name, street address, telephone
* Email address, internet IP address
* Anything that can identify the person (passport, driver’s license)
* Photographs, videos, or any other image
* Information belonging to, and about, a human (in legalese, a “natural person”)

Special Category Data includes:

* Information regarding criminal offences
* Medical conditions, etc

We also acknowledge the extra sensitivity needed for childrens’ data (ie age 13 or under). Because we may hold sensitive information on children, we take extra care.

The data we hold pertains to its “subject”, or the human that the data pertains to. Data subjects include players (adults and children), coaches, volunteers, parents, etc. Anyone who signs or is described on a membership form, for example, is a data subject. Anyone appearing in a photo, video or other image is a data subject. The list goes on…

If we fail in any of our responsibilities, penalties can apply including:

1. Fines up to 10% of global turnover or £300,000, whichever is greater
2. Fines up to £10,000,000 for certain cicumstances
3. Reputational damage
4. Potential damage to children, whose data we hold

# Data Protection Policy

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regard to the collection and use of personal data.

## We are committed to:

* Ensuring that we comply with the data protection principles, as listed below
* Meeting our legal obligations as laid down by the Data Protection (Bailiwick of Guernsey) Law, 2017.
* Ensuring that data is collected and used fairly and lawfully
* Processing personal data only in order to meet our operational needs or fulfill legal requirements
* Taking steps to ensure that personal data is up to date and accurate
* Establishing appropriate retention periods for personal data
* Ensuring that data subjects' rights can be appropriately exercised
* Providing adequate security measures to protect personal data
* Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
* Ensuring that all club officers are made aware of good practice in data protection
* Providing adequate training for all staff responsible for personal data
* Ensuring that everyone handling personal data knows where to find further guidance
* Ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly
* Regularly reviewing data protection procedures and guidelines within the club

## 6 Data protection principles:

1. **Lawfulness, fairness and transparency** - Personal data shall be processed fairly, lawfully, and in a transparent manner.
2. **Purpose Limitation** - Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. **Data Minimisation** - Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. **Accuracy** - Personal data shall be accurate and, where necessary, kept up to date.
5. **Storage Limitation** - Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. **Integrity and Confidentiality** - Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Personal data shall be processed in accordance with the rights of data subjects under the Data Protection (Bailiwick of Guernsey) Law, 2017.

## Specific Policy Details

**Lawful processing**

We establish that our processing of data is lawful on the basis that we need the information to safely offer the services of club membership, team training, and competitions in an enjoyable manner. We collect minimal information with the consent of the data subject (or their parent or guardian) in order to do this. We share data with XXX, who regulate, develop and manage the game. Our preference is to hold data only for one year, and then purge it. This may not be possible in all cases (eg incident reports or health data).

**Special Category data**

Some information we collect is sensitive. In addition to contact information and perhaps credit card details, we may also need to hold information about someone’s health and medical condition in order to provide for their safety. We may hold sensitive information on adults as well as children. The Child Safety Officer is available to assist in matters involving sensitive information on an underaged subject.

**Children (18)**

We define a child as any natural person under the age of 18 years. Organizations in other jurisdictions sometimes adopt a lower age threshold such as 16 (or even 13 in some EU countries), but our limit is 18. App purchases may be legal at 16 or even 13.

We look to provide extra care and sensitivity to protect child rights and safety, and this includes any information we have on them.

Note that the Law allows a child to exercise their rights themselves, depending on age and competence. For the same reasons, a request from a parent about subject access may be inappropriate. If in doubt, seek guidance from the ODPC and/or legal advice. This should be evaluated on a case by case basis regarding child welfare, and remember to document it.

**Accuracy**

Information we hold has been most likely provided by the data subject or their parent or guardian. We rely on them for the accuracy of any data collected.

Occasionally, there may be an incident report provided by a coach that could mention a team member or child. We rely on the coach for accuracy.

Where data processing is performed (eg entry into GMS), the policy is to ensure that the processing is accurate, reasonable and complete.

**Specified purposes only**

Data held must be used only for the specified purposes, as described above under Lawful Processing.

We do not:

* Provide data to external parties (except GMS for our own processing)
* Allow data we hold to be used for marketing purposes by external parties
* xxx

**GMS – Game Management System**

The Game Management System (GMS) was established as a central platform to help clubs complete a wide range of administration tasks. Key benefits (ie lawful basis of processing) include registering players, managing membership more efficiently, increasing revenue potential through online payments at a competitive rate, managing teams, fixtures and results and streamlining communication with club members. Clubs can also create and manage their own public facing websites via the system supplier, First Sports International (FSI).

Where you work in a particular role within the game, you may be required to undergo a Disclosure & Barring Service check using the XXX system. The result of this check will be input into your Game Management Service (GMS) record.

All of the data processing done via GMS lies at the heart of lawful processing. For our purposes, GMS is a Data Processor acting on behalf of the GRA (the Data Controller).

**Web site**

Our web site provides a good way to communicate with the public and team members, as well as to promote the game. This may include team photos and images which include players, coaches and others. Our web site also includes contact information for coaches and staff to help manage the club and teams.

**Twitter and Facebook**

Twitter and Facebook provide a good way to communicate with the public and team members, as well as to promote the game.

Our Facebook sites for Childrens’ teams are managed as private groups with approved membership. They are not public. As such, the control is with each group of parents and not with our organisation.

**Hard copy paperwork**

Team Coaches and Managers likely receive player and member forms which contain personal information. This information is usually entered into GMS for the season.

It is our policy to securely destroy hard copy information after the end of each season. Acceptable means include shredding or the use of secure commercial shredding bins and services, and other methods.

**Consent & Privacy Clauses**

These are attached. The Law requires that information provided to children must be clear in a plain way a child will understand.

Our privacy notices are written for children with sufficient reading and comprehension skills so as to understand the content of a membership form. For children not meeting these criteria (eg too young) we write with the parents or guardians as the intended audience.

Consents must have some kind of explicit, affirming action like ticking a box.

**Information Security**

Our policy is to maintain the availability, integrity and confidentiality of any information we collect and hold. This includes electronic or hard copy form. When we destroy information, we cease to hold it.

Service providers (GMS, web site, face book) are required to have an Information Security Policy that includes local Data Protection Law provisions.

# Procedure - Subject Requests

A “subject request” is made any time a data subject asks us to provide, change, or delete the information we hold about them. Subject requests fall into several categories, with slight variations on the action required to comply with them.

***Requests must be actioned within one calendar month.***

Upon receiving a subject request, once we establish that it is a formal request we should take the following immediate action.

|  |
| --- |
| ***Procedure – Subject Request:***   1. Acknowledge and log the request (date, time, receiver, requester, phone/email/etc). Begin to document it – we want to keep a GDPR log of any subject requests from the very beginning of the process. 2. Verify identity of requester (player, coach, parent, etc) and subject (player, child, etc), and that the request is genuine. Document this, establish validity. 3. Be clear about what the request is. What exactly does the requester want us to do? Change something? Delete something? Send them something? Document this too. 4. Understand the right to erasure and when such requests need to be complied with, and when personal data needs to be erased. 5. Verify the requester’s contact information so that we can follow up with them. Document this. 6. Establish who to notify with the request. When in doubt just ask the Data Protection Officer and/or Child Safety Officer. For a child, we must notify the Child Safety Officer, the Data Protection Officer, the relevant coaches and team manager. |

Understand the right to erasure and when such requests need to be complied with, and when personal data needs to be erased.

## Subject Access Request

This is when a data subject (or their parent/guardian) requests a copy of the information that we hold about them. We are required to provide it, and preferably in electronic form (PDF, etc)

## Rectification

* Document what errors there are and the data subjects, sources, etc.
* Locate the data & fix it
* Document the repair work (who, when, what, where)

|  |
| --- |
| ***Procedure – Subject Access Request:***   1. Follow steps 1-5 above and document the request and notify the Data Protection Officer. 2. Determine the format required to send the information in, eg electronic or hard copy? 3. Get the information 4. Stop and think: is there more? Facebook, web site, photos, images? GMS? 5. Do we need to redact any third party identifying information? 6. Send the information to the subject (or parent). Also point them to the Facebook site and the web site. 7. Document this process (what, when, where, who, how). |

Understand exemptions that may apply, meaning some personal data need not be supplied. Understand when a child is able to make a request themselves and when, If made by a parent some information could be withheld. When in doubt, ask the ODPC or seek legal advice.

# Procedure – Overseas Transfer

We transfer data to the UK in our use of the GMS system, with its data held on servers in Europe. For GDPR purposes, GMS is a Data Processor and we are still the Data Controller so the responsibility for data protection lies with us. We are allowed to transfer data to approved jurisdictions such as the UK and Jersey. The United States is not an approved jurisdiction for the purposes here, but there is a Privacy Shield Certification that can be relied on there.

Adequacy – since the UK is subject to GDPR we deem them to have adequate controls in place. Therefore we can lawfully transfer data to the UK and back, including for GMS.

***Procedure:***

1. Identify the countries involved in where you want to send data to.
2. Determine whether or not these countries are within the European Economic Area (EAA).
3. You can safely send data to countries within the EEA
4. If the third party will hold data outside the EEA, check that they have signed up to the European Commission approved model contract clauses regarding data protection or operate in a white-listed country.
5. For legal advice on this, you can contact the RFU’s Legal Helpline on 0330 303 1877.

# Procedure – Breach Handling

A “personal data breach” is defined as a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

For clarity, the following circumstances are lawful and do not constitute a breach:

* Data is deleted from GMS at the end of the season or when a subject has requested it.
* Paper forms are shredded or otherwise destroyed at the end of the season or after data has been transferred into GMS.
* Information is provided to medical personnel or police in an emergency.
* Information is provided to the regulator when required.

|  |
| --- |
| ***Procedure:***   1. Team: Identify that a breach has happened. Who found it? Who notified us? What happened, when, where, who does it affect? What information has been involved? Begin to document the facts – keep good notes. 2. Team: Notify the Data Protection Officer. Confirm conditions are met for a breach. Log it either way. 3. DPO: Identify what data subjects and what data were affected. Timeline. 4. DPO: If information about a child was involved, also notify the Child Safety Officer. 5. DPO: document, keep records of the breach and response. 6. Team: take any remedial action possible/reasonable. 7. Team: determine if there is a risk to the rights and freedoms of the subject, and if a regulatory notification is required (number and type of personal data). 8. DPO: make Data Breach Notification (to regulator) ***within 72 hours*** if required. See [www.odpc.gg](http://www.odpc.gg), and the link for Breach Reporting. 9. Team: if there is a risk to the rights and freedoms of the subject, or a high level of risk to the individual’s significant interests, then notify them in a timely manner in clear and plain language. |

The Data Breach Notification to the regulator must:

1. describe the nature of the personal data breach:
   1. categories and approx number of data subjects concerned
   2. categories and approx number of data records concerned
2. communicate the name and contact details of the DPO or other contact point where more information may be obtained
3. describe the likely consequences
4. describe measures taken by the controller to address it, including any measures taken to mitigate possible adverse affects

# Contacts

Please use Dennis Stoller for the first point of contact, thanks.

|  |  |  |
| --- | --- | --- |
| Name | Contacts | Role |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Office of the Data Protection Commissioner | <https://ico.org.uk/> | UK Information Commissioner |
| St Martins House  Le Bordage  St Peter Port  Guernsey GY1 1BR  enquiries@odpc.gg  +44 (0)1481 742074  [www.odpc.gg](http://www.odpc.gg) | Guernsey Data Protection Commissioner |

# Privacy Notice Template

*This is a template for a local childrens’ sport connected to a larger sporting organisation in the UK. It should be tailored to fit your situation and requirements. If you don’t have a connection to another (national) body, for example, just delete those items that refer to it. This template should be broad enough to easily adapt for other charities and non-profits. Once adapted, it should be provided to people via your web site as a stand-alone document and referred to in membership forms and wherever there is a consent clause.*

Privacy Notice

**Summary of how we use your data**

* We use your personal data to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes.
* Some data may be shared with XXX, who use your data to regulate, develop and manage the game. This includes use of the XXX system.
* Where we rely on your consent you can withdraw it at any time.
* Amongst the data we collect from participants may be medical (including injury) information. We will hold this where you (or your parent) have given consent so that we can ensure we are aware of your condition and can that you are supported appropriately.
* Where you work in a particular role within the game, you may be required to undergo a Disclosure & Barring Service check using the XXX’s XXX system. The result of this check will be input into your XXX record.

**What does this policy cover?**

This policy describes how the XXX (also referred to as “we” or “us”) will make use of the data we handle in relation to our members and players, including our use of the Game Management System (“GMS”) provided by the XXX.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

**What information do we collect?**

For Club Members, we collect some personal data from you, including:

* your name and home address,
* email address and phone number
* membership type (supporter, couple, family, player, junior)

For a participant, wecollect and process personal data from you or your parent when you join and when we carry out annual renewals of your membership. This includes:

* your name and date of birth,
* your gender,
* your XXX ID (as assigned in GMS),
* your home address, email address and phone number;
* your passport and NI details, where we have to check your eligibility or ability to work for us,
* your type of membership and involvement in particular teams, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc,
* your payment and/or bank account details, where you provide these to pay for membership,
* your marketing preferences, including any consents you have given us,
* your medical conditions or disability, where you provide this to us with your (or your parent’s) consent to ensure we are aware of any support we may need to provide.

Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

**What information do we receive from third parties?**

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from the XXX through GMS. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and XXX on the status of any DBS check you have been required to take.

**How do we use this information, and what is the legal basis for this use?**

We process this personal data for the following purposes:

* To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for your membership and any merchandise, or enter a competition. This includes taking payments, communicating with you, and providing and arranging the delivery or other provision of products, prizes or services;
* As required by the Club to conduct our business and pursue our legitimate interests, in particular:
  + we will use your information to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes;
  + we will also use data to maintain records of our performances and history, including match reports, score lines and team sheets;
  + we may choose to send you promotional materials and offers by post or by phone, or by email where we want to send you offers relating to similar products and services that you have already bought.
  + we use data of some individuals to invite them to take part in market research;
* Where you give us consent:
  + we may send you direct marketing or promotional material by email;
  + we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;
  + on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
* For purposes which are required by law:
  + we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
  + we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.
  + where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;
  + we may respond to requests by government or law enforcement authorities conducting an investigation.

**How does the** XXX **use any of my information?**

The XXX provides GMS, but make its own use of the following information:

* your name;
* your gender;
* your date of birth;
* your XXX ID (as assigned in GMS);
* your home address, email address and phone number; and
* your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.

The XXX uses this information as follows:

* As required by the XXX to conduct its business and pursue its legitimate interests, in particular:
  + communicating with you or about you where necessary to administer Rugby in England, including responding to any questions you send to the XXX about GMS;
  + administering and ensuring the eligibility of players, match officials and others involved in English rugby – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;
  + maintaining records of the game as played in England, in particular maintaining details of discipline and misconduct;
  + monitoring use of GMS, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about GMS;
  + maintaining statistics and conducting analysis on the make-up of rugby’s participants;
  + ensuring compliance with the current XXX Rules and Regulations including those on the affiliation of clubs, referee societies, constituent bodies and other rugby bodies, and registration of players; and
  + communicating with you to ask for your opinion on RFU initiatives.
* For purposes which are required by law:
  + The RFU will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is also carried out with your consent.
  + The RFU may respond to requests by government or law enforcement authorities conducting an investigation.

**Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above.

You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the “**How do I get in touch with you?**” section.

**Who will we share this data with, where and when?**

Some limited information may be shared with other stakeholders in rugby, such as other clubs, Constituent Bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the RFU’s legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the RFU as the provider of GMS, providers of Pitcheroo (web site) or the team’s Facebook page.

**What rights do I have?**

You have the right to **ask us for a copy** of your personal data; to **correct**, **delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don’t have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with us– or, as appropriate, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to the Office of the Data Protection Commissioner.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

**How do I get in touch with you?**

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch at xxx@xxx.com or by writing to XXX.

**How long will you retain my data?**

We process the majority of your data for as long as you are an active member and for 6 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data for 6 years unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU’s privacy notice to be set out on www.englandrugby.com.

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by us and the RFU in order to maintain a record of the game.

**Transfers to Unauthorised Jurisdictions**

As outlined above, we may transfer your data to England RFU, who are an authorised jurisdiction. We will not transfer your data to an unauthorised jurisdiction.

**Data Protection Officer**

We have designated a Data Protection Officer who you can contact for enquiries and complaints:

Name, contact details (email, phone)

**Special Category Data**

We hold Special Category Data in order to provide our services to you. This includes health information, criminal record checks and background checks.

# Data Inventory and Impact Assessment

<https://odpc.gg/wp-content/uploads/2018/06/Conditions.pdf>

**For personal data not considered to be special category data, a controller must satisfy at least one of the conditions below:**

* The data subject has requested or given consent to the processing of the personal data for the purpose for which it is processed
* The processing is necessary for the performance of a contract to which the data subject is a party or that is in the interests of the data subject
* The processing is necessary to protect the vital interests of the data subject or other individual
* The processing is necessary for the purposes of legitimate interests (not applicable for public authorities)
* The processing is necessary for the exercise or performance of a public function or task carried out in the public interest by a public authority
* The processing is necessary for the exercise of a right, power or duty imposed by law
* The information contained in the personal data has been deliberately made public by the data subject
* The processing is necessary for the exercise of a right or power imposed by enactment
* The processing is necessary in order to comply with a court order or judgement
* The processing is necessary for a health or social care purpose
* The processing is necessary for reasons of public health
* The processing is necessary for the purpose of, or in connection with legal proceedings (including prospective legal proceedings), discharging any court or tribunal functions, obtaining legal advice or otherwise for the purposes of establishing, exercising or defending legal rights
* The processing is necessary for the administration of justice or the exercise of any function of the Crown, a Law Officer of the Crown, the States or a public committee
* The processing is necessary for a law enforcement purpose
* The processing is in the context of not-for-profit organisations that exist for political, philosophical, religious or trade-union purposes.
* The processing is necessary for historical or scientific purposes
* The processing is necessary for the purposes of equal opportunity
* The processing is authorised by regulation or other enactment

**A controller processing special category data must satisfy at least one of the conditions below:**

* The data subject has given explicit consent to the processing of the personal data for the purpose for which it is processed
* The processing is necessary to protect the vital interests of the data subject or other individual and the data subject is physically or legally incapable of giving consent or the controller cannot reasonably be expected to obtain the explicit consent
* The information contained in the personal data has been deliberately made public by the data subject
* The processing is necessary for the exercise of a right or power imposed by enactment
* The processing is necessary in order to comply with a court order or judgement
* The processing is necessary for a health or social care purpose
* The processing is necessary for reasons of public health. Make sure that you can identify at least one of the above conditions if you are processing any personal data that is not special category data.
* The processing is necessary for the purpose of, or in connection with legal proceedings (including prospective legal proceedings), discharging any court or tribunal functions, obtaining legal advice or otherwise for the purposes of establishing, exercising or defending legal rights
* The processing is necessary for the administration of justice or the exercise of any function of the Crown, a Law Officer of the Crown, the States or a public committee
* The processing is necessary for a law enforcement purpose
* The processing is in the context of not-for-profit organisations that exist for political, philosophical, religious or trade-union purposes.
* The processing is necessary for historical or scientific purposes
* The processing is necessary for the purposes of equal opportunity
* The processing is authorised by regulation or other enactment

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Data / Collection Channel** | **Description** | **Where From** | **Where sent** | **Why processed** | | **How is processing lawful and fair?** | **Have you provided individuals with details?** | | **Consent Given** | **Usual Retention Period or Criteria** | **Notes** |
| CCTV | Footes Lane | If any, it would be owned by the States of Guernsey and have nothing to do with the GRA. | | | | | | | | | |
| videos | Colts game videos | Coaches | N/A | Used for training purposes | See above lists of Conditions, choose at least one here. | | |  | Yes – Player Membership, Registration & Consent Form | Annual | Includes children under 18 |
| GMS – Game Management System | Info from Membership Forms is entered, stored and used here | Team Managers | RFU England system | Membership account, payments | necessary to protect the vital interests of the data subject (health info) | | |  | Yes – Player Membership, Registration & Consent Form | Annual | Includes children under 18.  Medical info? |
| membership cards |  |  |  |  |  | | |  |  |  |  |
| Player Membership, Registration & Consent Form | Personal details, medical info |  |  |  | Consent given | | | Individuals decide to fill out and sign these. | The processing is necessary for the performance of a contract with the individual | Annual | Includes children under 18. |

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Data/Collection Channel** | **Description** | **Where From** | **Where sent** | **Why processed** | **How is processing lawful and fair?** | **Have you provided individuals with details?** | **Consent Given** | **Usual Retention Period or Criteria** | **Notes** |
| payment details, cheques and instructions |  | Players and/or Parents | Team Managers |  | Consent given |  | The processing is necessary for the performance of a contract with the individual |  |  |
| accounting |  |  |  |  | Consent given |  | The processing is necessary for the performance of a contract with the individual |  |  |
| Facebook, Twitter, Web Site | Private facebook groups for each team |  |  |  |  |  | Yes – Player Membership, Registration & Consent Form |  | Includes children under 18. Parents post to media |