

## **The Scottish Schools' Football Association**

### **Data Protection Policy – Revised and Updated May 2018**

This Policy relates to information from which individuals can be identified and sets out how the Association will manage such information.

#### **1. Definitions**

Throughout this Policy, the following definitions apply:

**Name: Scottish Schools' Football Association**

**Association Personnel:** all office bearers, secretariat and Executive members.

**Data Controller:** the person or organisation that determines when, why and how to process Personal Data.

**Data Protection Act 2018:** The Data Protection Act 2018, as amended from time to time.

**Data Subject:** an identified or identifiable individual about whom we hold Personal Data.

**Data Privacy Impact Assessment (DPIA):** tools and assessments used to identify and reduce risks of a data processing activity.

**DPO** - SSFA has not appointed a specific Data Protection Officer therefore in this document reference is made to the Person with Responsibility for Data Protection, which in normal circumstances will be the Association's General Secretary

**General Data Protection Regulation (GDPR):** the EU General Data Protection Regulation.

**Personal Data:** any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers.

**Personal Data Breach:** the loss, or unauthorised access, disclosure or acquisition of Personal Data.

**Privacy Guidelines:** Privacy/GDPR and Data Protection Act 2018 related guidelines provided to assist in interpreting and implementing this Data Protection Policy and Related Policies, as amended from time to time. These are available from the Association Secretary.

**Privacy Notices:** separate notices setting out information that may be provided to you that details why we collect information about you and what we do with it.

**Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

**Related Policies:** The Association's policies, operating procedures or processes related to this Data Protection Policy and designed to protect Personal Data, as amended from time to time. These are available from the General Secretary.

**Sensitive Personal Data:** information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

## 2. Introduction

This Data Protection Policy applies to all Personal Data the Association processes regardless of how that data is stored or whether it relates to past or present employees, apprentices, workers, contractors, agency workers, volunteers and interns

This Data Protection Policy applies to all Association Personnel. You must read, understand and comply with this Data Protection Policy. You must also comply with all such Related Policies and Privacy Guidelines, including any amendments.

## 3. Scope

The Association recognises that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. It is a critical responsibility that is taken seriously at all times.

Whilst employees are required to comply with the terms of this Data Protection Policy, it does not form part of their employment contract.

Please contact the General Secretary with any questions about the operation of this Data Protection Policy or if you have any concerns that this Data Protection Policy is not being or has not been followed.

## 4. Types of Data Held

The Association holds data primarily for enabling organisational processes.

In general terms this will be:

- contact details of persons who are involved in running the Association's activities, including team coaches and related volunteers such as physiotherapists.
- contact details of a person involved with a school or Local Association which is participating in one of the football competitions organised by the SSFA. (This is normally the person's name, email address and school address)
- contact details of a person involved with a school or Local Association which is participating in one of the football competitions organised by SSFA where there is a requirement to share that

information with the SFA or other such organisation with which there is a need to have a formal relationship to ensure that the business of the SSFA can be completed as required

- contact details and note of any medical conditions of persons who are selected to play for the Association's international teams.

## **5. Personal Data Protection Principles**

### **5.1 Lawfulness and Fairness**

Data may only be collected by the Association if the Processing is fair, lawful and for specified purposes, some of which are set out below:

- (a) the Data Subject has given his or her consent;
- (b) the Processing is necessary for the performance of a contract with the Data Subject;
- (c) to meet legal compliance obligations;
- (d) to protect the Data Subject's vital interests;
- (e) to pursue legitimate interests.

### **5.2 Consent**

In some circumstances consent may be required. Consent should be freely given, specific and informed. It may also be withdrawn at any time.

### **5.3 Transparency**

Information in relation to how and why the Association collects data will be provided through appropriate Privacy Notices.

### **5.4 Purpose Limitation**

Personal Data will be collected only for specified, explicit and legitimate purposes. It will not be further Processed in any manner incompatible with those purposes. Personal Data will not be processed for new, different or incompatible purposes from that disclosed when it was first obtained unless the Data Subject has been informed and has consented where necessary.

### **5.5 Data Minimisation**

Personal Data will be adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed. When Personal Data is no longer needed, it is deleted or anonymised in accordance with the Association's data retention guidelines.

### **5.6. Accuracy**

The Association will ensure that the Personal Data used and held is accurate, complete, kept up to date and relevant to the purpose for which it is collected. The Association will take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

## **5.7. Storage Limitation**

Personal Data will be kept in an identifiable form for no longer than is necessary for the purposes for which the data is processed.

## **6. Security Integrity and Confidentiality**

### **6.1 Protecting Personal Data**

Personal Data will be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

Association Officers and Secretariat must follow all procedures and technologies put in place to maintain the security of all Personal Data from the point of collection to the point of destruction.

### **6.2 Reporting a Personal Data Breach**

The GDPR and Data Protection Act 2018 requires Data Controllers to notify any Personal Data Breach to the applicable regulator, and, in certain instances, the Data Subject. Procedures have been put in place to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where legally required to do so within 72 hours.

If you know or suspect that a Personal Data Breach has occurred, you should contact the Association Secretary immediately.

## **7. Transfer Limitation**

If data is to be transferred outwith the EU the transfer will comply with the Association's guidelines on cross border data transfers which is available from the General Secretary. OR Where it appears necessary to transfer Personal Data outside of the UK, the first point of contact must be the General Secretary for guidance on how this can be achieved within the scope of the GDPR and Data Protection Act 2018.

## **8. Association Procedures**

The Association has appointed the General Secretary with a specific responsibility for protecting the personal data of individuals in respect of processing and controlling the data. If you wish further information in relation to the steps taken please contact the General Secretary.

## **9. Data Subject's Rights and Requests**

Data Subjects have certain rights when it comes to how their Personal Data is handled.

These include rights to:

- withdraw consent to Processing

- receive certain information about the Data Controller's Processing activities
- request access to the Personal Data that is held
- ask for erasure of Personal Data if it is no longer required for the purpose for which it was collected or Processed
- rectify inaccurate data
- complete incomplete data
- restrict Processing in specific circumstances
- challenge Processing which has been justified on the basis of the Association's legitimate interests or in the public interest
- prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else
- be notified of a Personal Data Breach which is likely to result in high risk to a person's rights and freedoms
- make a complaint to the supervisory authority.

You must immediately forward any Data Subject request you make or receive to the Association Secretary and comply with the Association's Data Subject response process.

### **10. Accountability**

The Association will implement appropriate technical and organisational measures to ensure compliance with data protection principles. The Association's policies and procedures are one way to demonstrate compliance with the GDPR and Data Protection Act 2018.

### **11. Record Keeping**

Where required by the GDPR and Data Protection Act 2018 the Association will keep full and accurate records of all its data Processing activities. In addition, it will keep records of Data Subjects' consents and procedures for obtaining consents, in accordance with the Association's record keeping guidelines.

### **12. Training and Audit**

All Association Personnel are required to read and understand the Data Protection Policy when they are inducted. In addition, there will be a requirement to undergo training appropriate to an individual's role to enable that person to comply with the GDPR and Data Protection Act 2018.

### **13. Sharing Personal Data**

The Association will only share Personal Data with third parties where certain safeguards and contractual arrangements have been put in place.

The Association only share Personal Data it holds with third parties, including but not limited to our service providers if:

- there is a lawful basis for doing so;

- sharing the Personal Data complies with the Privacy Notices provided to the Data Subject and, if applicable, consent has been obtained; and
- the third party has agreed to comply with the required data security policies and procedures and put adequate security measures in place.

The Association may share the Personal Data it holds with another employee, agent or representative of our group [(which includes our subsidiaries and our ultimate holding Association along with its subsidiaries)] if the recipient has a job-related need to know the information.

**14. Changes to this Data Protection Policy**

The Association reserves the right to change this Data Protection Policy at any time without notice to you. This Data Protection Policy does not override any applicable national data privacy laws and regulations in countries where the Association operates.

**15. Acknowledgement of Receipt and Review**

By ticking the box and signing this form, you confirm that you have read and understood the above privacy statement and as such give us the consent required to contact you regarding matters as highlighted above.

It is acknowledged that:

- You may request details of the personal information held on our behalf.
- Where your personal information is held for other than legal and contractual requirements, you may withdraw this consent at any time.

I have read the above Scottish Schools' Football Association Statement

I opt in to allow the Scottish Schools' Association Statement to process and store my data as mentioned.

I understand that I am free to opt out at any time

**Signed** .....

**Printed Name** .....

Date .....

Signed .....

Printed Name .....  
(on behalf of the Scottish Schools' Football Association)

August 2022