

# AYR UNITED FOOTBALL ACADEMY



**POLICY** DATA PROTECTION  
**FOR** POLICY  
**VERSION** VOLUNTEERS AND  
1.4 STAFF

Created  
Reviewed by Board of Management  
Last review date  
Next review date

2006  
November 2009  
November 2015  
December 2016

## **UPDATES**

**Date:** 25<sup>th</sup> September 2014  
**Report to:** Board of Ayr United Football Academy  
**Author:** Donald Stewart  
**Purpose:** To agree annual review of policy  
**Agreement:** No changes  
**Rationale:** There have been no significant changes to Data Protection Policy or advice nationally. There have been no requests from staff or volunteers for changes

**Date:** 30<sup>th</sup> November 2015  
**Report to:** Board of Ayr United Football Academy  
**Author:** Stuart Galloway  
**Purpose:** To agree annual review of policy  
**Agreement:** No changes  
**Rationale:** There have been no significant changes to Data Protection Policy or advice nationally. There have been no requests from staff or volunteers for changes

## OVERVIEW

Ayr United Football Academy adheres to the principles enshrined in the Data Protection Act 1998. Those eight principles are: -

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless: –
  - (a) at least one of the conditions in Schedule 2 is met, and
  - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only 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. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. 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.

Any personal information you give to us will be processed in accordance with the UK Data Protection Act 1998.

The following personal data is, at the time of review, held by Ayr United Football Academy: -

- Disclosure Information with regards to membership of the Protection of Vulnerable Groups scheme (PVG)
- Personnel records for all staff and volunteers
- Player records for each and every team
- Records for emergencies of participants within each project

Ayr United Football Academy also practice the following: -

- We inform people why we are asking for their information
- We train our staff in data protection
- Strong passwords are used that would include capitals, numbers, characters and letters
- We keep all information only for as long as necessary

Whilst we recognise that encrypted laptops would be highly helpful, as a small charity we are unable to invest in these for the level of data we hold. It is therefore noted how important having highly secure passwords therefore are.

## Disclosure records

In accordance with the Scottish Executive Code of Practice, for registered persons and other recipients of Disclosure Information, the Ayr United Football Academy will ensure the following practice.

Disclosures will only be requested when necessary and relevant to a particular post and the information provided on a disclosure certificate will only be used for recruitment purposes.

The Ayr United Football Academy will ensure that an individual's consent is given before seeking a disclosure, and will seek their consent before using disclosure information for any purpose other than recruitment. Disclosure information will only be shared with those authorised to see it in the course of their duties.

Where additional disclosure information is provided to the Ayr United Football Academy and not to the disclosure applicant, the Ayr United Football Academy will not disclose this information to the applicant, but will inform them of the fact that additional information has been provided, should this information affect the recruitment decision.

Disclosure information will be stored in a locked non-portable container, for a maximum of 3 months. Only those authorised to see this information in the course of their duties will have access to this container.

Disclosure information will be destroyed by shredding.

No image or photocopy of the Disclosure information may be retained. Recipients of Disclosure information may, however, keep a record of the following:

- Date of issue of disclosure
- Name of subject
- Disclosure type
- Position for which disclosure was requested
- Unique reference number of disclosure
- Recruitment decision taken

The Ayr United Football Academy will ensure that all staff with access to disclosure information are aware of this policy and have received relevant training and support. The Ayr United Football Academy undertakes to make a copy of this policy available to any applicant for a post with the Ayr United Football Academy that requires a disclosure. No information will be released to organizations, which is not revealed also to applicants.

Principle	Narrative
Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless: – (a) at least one of the conditions in Schedule 2 is met, and (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.	Schedule 2 is met as the information is held for one lawful purpose; Schedule 3 is met as it is not excessive in relation to the purpose for which it is gathered
Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.	The information is gathered to ensure that we comply with the Protection of Vulnerable Groups (PVG) Act 2010
Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.	Information that is gathered complies with the regulations as set out by VSDS in relation to Disclosure and the PVG scheme

<p>Personal data shall be accurate and, where necessary, kept up to date.</p>	<p>All information that is kept is received from the individual concerned or from VSDS in relation to any convictions or intelligence that would render them unsuitable from working with children or vulnerable adults.</p>
<p>Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.</p>	<p>All data is kept in relation to time frames set by VSDS. Once a member of staff or volunteer for whom we hold such information leaves us we destroy that information within one month of them leaving.</p>
<p>Personal data shall be processed in accordance with the rights of data subjects under this Act.</p>	<p>Any person wishing to see a copy of their data held at the Academy shall be allowed to see this without reasonable delay</p>
<p>Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.</p>	<p>All data is handled only by those people recognised by VSDS as registered for the purposes of this function. All data is kept in a locked cabinet.</p>
<p>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.</p>	<p>No data is transferred out of Scotland.</p>

## Personnel records

Principle	Narrative
<p>Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless: –</p> <p>(a) at least one of the conditions in Schedule 2 is met, and</p> <p>(b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.</p>	<p>Schedule 2 is met as the data is obtained for only one purpose; schedule 3 is met as only relevant data is requested</p>
<p>Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.</p>	<p>Records are kept in order to maintain communication with staff and volunteers and for communication with governing bodies – VASA, SFA etc</p>
<p>Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.</p>	<p>Simple records are kept in order to ensure that we comply with external regulations and communicate effectively with all members</p>
<p>Personal data shall be accurate and, where necessary, kept up to date.</p>	<p>We have volunteers tasked with the responsibility of ensuring that we have accurate records – Volunteer Coordinators</p>
<p>Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.</p>	<p>When volunteers or staff leave we do not retain records from the point where a final submission to a governing body is required</p>
<p>Personal data shall be processed in accordance with the rights of data subjects under this Act.</p>	<p>Any person wishing to see a copy of their data held at the Academy shall be allowed to see this without reasonable delay</p>
<p>Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.</p>	<p>All data is stored electronically and only shared with those people who have responsibility for communication within the organization or complete necessary forms for governing bodies</p>
<p>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.</p>	<p>No data is transferred out of Scotland.</p>

## Player records

Principle	Narrative
<p>Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless: –            (a) at least one of the conditions in Schedule 2 is met, and            (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.</p>	<p>Schedule 2 is met as the information is held for one lawful purpose; Schedule 3 is met as it is not excessive in relation to the purpose for which it is gathered</p>
<p>Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.</p>	<p>Data is recorder to ensure compliance with governing bodies and to ensure any medical treatment is appropriately applied</p>
<p>Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.</p>	<p>Data is only held that relates to governing body registration, communication and medical treatment</p>
<p>Personal data shall be accurate and, where necessary, kept up to date.</p>	<p>All data is managed by a specific volunteer to ensure accuracy – Player Registration Coordinator</p>
<p>Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.</p>	<p>When volunteers or staff leave we do not retain records from the point where a final submission to a governing body is required</p>
<p>Personal data shall be processed in accordance with the rights of data subjects under this Act.</p>	<p>Any person wishing to see a copy of their data held at the Academy shall be allowed to see this without reasonable delay</p>
<p>Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.</p>	<p>All data is stored electronically and only shared with those people who have responsibility for communication within the organisation or complete necessary forms for governing bodies</p>
<p>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.</p>	<p>No data is transferred out of Scotland.</p>

## Project participant records

Principle	Narrative
<p>Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless: –            (a) at least one of the conditions in Schedule 2 is met, and            (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.</p>	<p>Schedule 2 is met as the information is held for one lawful purpose; Schedule 3 is met as it is not excessive in relation to the purpose for which it is gathered</p>
<p>Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.</p>	<p>Information is held as contact details, should there be an emergency or a need to contact carers</p>
<p>Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.</p>	<p>Only contact details are held</p>
<p>Personal data shall be accurate and, where necessary, kept up to date.</p>	<p>Project coordinators and coaches on the ground collect such information as is necessary</p>
<p>Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.</p>	<p>Once each project has finished all personal details are securely destroyed.</p>
<p>Personal data shall be processed in accordance with the rights of data subjects under this Act.</p>	<p>Any person wishing to see a copy of their data held at the Academy shall be allowed to see this without reasonable delay</p>
<p>Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.</p>	<p>Information is held in hard and/or soft copy. Care is taken to ensure that this information is not shared as the soft copies are on a secured server and the hard copies kept in a locked office.</p>
<p>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.</p>	<p>No data is transferred outside of Scotland.</p>