



# OLD GRAVESENDIANS SPORTS ASSOCIATION LTD

Fleetway Sports Ground, Bronte View, Gravesend, Kent, DA12 1PX

## Data Protection Policy

### 1. Purpose of This Policy

Old Gravesendians Sports Association Ltd (hereafter the OGSA or Club) is a co-operative based sports association registered under the **Co-operative and Community Benefit Societies Act 2014**. As a society operating under FCA oversight and UK sports governance standards the OGSA is committed to protecting the personal data of its members, volunteers, staff and partners.

This policy sets out how the OGSA complies with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, ensuring lawful, fair, and transparent processing of personal data.

### 2. Scope

This policy applies to:

- All OGSA Directors, Officers, Committee members, volunteers, contractors and staff
- All personal data processed by OGSA in any format (digital, paper, audio, video)
- All systems, platforms, and third-party services used by OGSA

### 3. Governance and Accountability

OGSA recognises its obligations under FCA expectations for CBS governance, including:

- Maintaining robust internal controls
- Ensuring responsible stewardship of member information
- Demonstrating compliance with legal and regulatory duties

The OGSA's Management Committee is responsible for ensuring compliance with this policy. A designated **Data Protection Officer (DPO)** oversees day-to-day data protection matters.

### 4. Lawful Basis for Processing

The OGSA processes personal data only where a lawful basis exists under UK GDPR:

- **Consent** – e.g., marketing communications, photography permissions
- **Contract** – membership administration, Staff contracts
- **Legal obligation** – safeguarding, financial reporting, FCA compliance
- **Vital interests** – emergency medical information
- **Legitimate interests** – club operations, event management, volunteer coordination

The OGSA maintains a **Record of Processing Activities (ROPA)** documenting each processing purpose and lawful basis.



# OLD GRAVESENDIANS SPORTS ASSOCIATION LTD

Fleetway Sports Ground, Bronte View, Gravesend, Kent, DA12 1PX

## 5. Types of Data Collected

OGSA may collect and process:

- Member registration details (name, contact details, DOB)
- Medical and emergency contact information
- Volunteer and staff records
- Financial information (membership fees, payments)
- Safeguarding records (restricted access)
- CCTV or event photography (where applicable)

Special category data (e.g., health information) is processed only under strict conditions and with enhanced safeguards.

## 6. Data Minimisation and Retention

The OGSA collects only the minimum data necessary for legitimate club operations.

Retention periods follow:

- Membership records: **6 years after membership ends**
- Financial records: **6 years** (HMRC requirement)
- Safeguarding records: **per statutory guidance**
- Medical information: **only for the duration of participation**
- Emails and routine correspondence: **2 years**
- CCTV: **30 days**, unless required for investigation

A full retention schedule is maintained and reviewed annually.

## 7. Data Storage and Security

The OGSA implements appropriate technical and organisational measures, including:

- Encrypted digital storage
- Access controls and role-based permissions
- Secure password policies
- Locked physical storage for paper records
- Regular backups and secure disposal procedures
- Use of FCA-compliant systems for financial and governance records

Third-party processors (e.g., payment providers, email platforms, sports management systems) are vetted for UK GDPR compliance.



# OLD GRAVESENDIANS SPORTS ASSOCIATION LTD

Fleetway Sports Ground, Bronte View, Gravesend, Kent, DA12 1PX

## 8. Data Sharing

OGSA does **not** sell or share personal data for commercial purposes.

Data may be shared only when:

- Required by law (e.g., FCA, HMRC, safeguarding authorities)
- With explicit consent (e.g., marketing, photography)
- With vetted third-party processors under written agreements

All sharing is documented and subject to strict controls.

## 9. Member and Participant Rights

Under UK GDPR, individuals have the right to:

- Access their personal data (Subject Access Request – SAR)
- Request correction of inaccurate data
- Request deletion (where lawful)
- Restrict processing
- Object to processing
- Data portability (where applicable)
- Withdraw consent at any time

The OGSA will respond to SARs within **one month**, in line with statutory requirements.

## 10. Data Breach Reporting

OGSA maintains a **Data Breach Response Procedure**.

A breach must be reported immediately to the Data Protection Officer. OGSA will:

- Assess the severity and impact
- Notify affected individuals where there is a high risk
- Report to the **Information Commissioner's Office (ICO)** within **72 hours** if required
- Document all breaches and remedial actions

## 11. Safeguarding and Special Protections for Young People

As a sports organisation, OGSA follows UK sports governance standards and safeguarding requirements:

- Enhanced protection for minors' data
- Restricted access to safeguarding records
- Mandatory training for coaches and volunteers



# OLD GRAVESENDIANS SPORTS ASSOCIATION LTD

Fleetway Sports Ground, Bronte View, Gravesend, Kent, DA12 1PX

- Clear consent procedures for photography and media
- Compliance with CPSU (Child Protection in Sport Unit) guidance

## 12. International Transfers

OGSA currently does not transfer data outside the UK. Should this change (e.g. cloud services) the OGSA shall ensure that the following are in place:

- Adequacy decisions
- Standard Contractual Clauses (SCCs)
- Appropriate safeguards

## 13. Policy Review

This policy is reviewed annually by the Management Committee or sooner if:

- Legislation changes
- FCA guidance updates
- UK sports governance standards change
- New systems or processing activities are introduced

## 14. Contact

For questions, concerns, or data requests:

**Data Protection Officer:** Andrea Kitchener

[info@ogsa.co.uk](mailto:info@ogsa.co.uk)

Fleetway Sports Ground, Bronte View, Gravesend, Kent, DA12 1PX

| Version Control: Document History |                              |                         |                                         |                              |
|-----------------------------------|------------------------------|-------------------------|-----------------------------------------|------------------------------|
| Version                           | Date                         | Owner                   | Description                             | Review date                  |
| V1.0                              | 27 <sup>th</sup> August 2026 | Data Protection Officer | Initial draft of data protection Policy | 27 <sup>th</sup> August 2027 |