



Privacy Notice

Last reviewed: 08/06/23

Introduction

Barnwood United AFC take your privacy very seriously

This Privacy Notice sets out how we use and look after the personal information we collect from you. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

What personal data we hold on you

Personal data means any information about an individual from which that individual can be identified. We collect, use, store and transfer some personal data of our participants (and their parents or guardians), other Club members and hirers and users of the Coopers Edge Sports Hub. Additionally, CCTV is installed at Coopers Edge Sports Hub which will, at times, capture personal data of members of the public.

You provide information about yourself when you register with the Club, and by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise.

The information you give us may include your name, date of birth, address, e-mail address, phone number, gender, and the contact details of a third party in the case of emergency. We may also ask for relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding. Where we hold this data it will be with the explicit consent of the participant or, if applicable, the participant's parent or guardian.

Where we need to collect personal data to fulfil Club responsibilities and you do not provide that data, we may not be able honour or administer your membership.

CCTV at Coopers Edge Sports Hub

Barnwood United AFC is committed to ensuring the safety and security of all individuals using the Coopers Edge Sports Hub. As part of this commitment, we have installed CCTV cameras at the facility. This notice explains why we use CCTV, how we process the data, and your rights concerning this processing.

CCTV monitoring is provided to enhance the safety and security of visitors, staff, and property, to deter and prevent criminal activities such as vandalism, theft, and unauthorised access. In the event of an incident, where required to do so, we will provide evidence to law enforcement agencies.

CCTV cameras are positioned at key locations around the Coopers Edge Sports Hub including building entrances and exits, car parks, playing fields, caged Astro Turf Pitch and MUGA.

Video footage of individuals in and around the sports facility will be collected and stored securely for a maximum of 30 days, unless required longer for an investigation. Access to footage is restricted to authorised personnel only.

A thorough Data Protection Impact Assessment (DPIA) for Barnwood United AFC CCTV Installation is included in the appendix of this notice.

Why we need your personal data

We will only use personal data for any purpose for which it has been specifically provided.

The reason we need participants' and members' personal data is to be able to run the football club, operate our facilities, arrange matches, to administer memberships, and provide the services hirers and members are signing up to when you register with the club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a participant or member to provide the services you are registering for.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

| Purpose/ Processing Activity | Lawful Basis for processing under Article 6 of the GDPR. |
|--|---|
| processing membership forms and payments/ subs | Performance of a contract |
| organising matches | Performance of a contract |
| sending out match or Club information and updates | Performance of a contract |
| sharing data with coaches, managers or officials to run training sessions or enter events | Performance of a contract |
| sharing data with leagues we are in membership of, county associations and other competition providers for entry in events | Performance of a contract |
| sharing data with committee members to provide information about club | The Club has a legitimate interest to maintain member and participant correspondence for club community purposes. |

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| activities, membership renewals or invitation to social events | |
| sharing data with third party service or facility providers | The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Provision of some third party services is for the benefit of the Club, participants and its members. |
| sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority | The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the Club, participants and its members. |
| publishing match and league results | Consent. We will only publish your personal data in a public domain, including images and names, if you have given your consent for us to do so. In the case of children under the age of 13 then only with written consent of parent/guardian |
| sending out marketing information such as newsletters and information about promotions and offers from sponsors | Consent. We will only send you direct marketing if you are an existing member, participant or other associated individual and you have not previously objected to this marketing, or, you have actively provided your consent. |
| to ensure we understand possible health risks | Consent. We will only process details on your medical history with your consent. |
| CCTV footage to enhance the safety and security of visitors, staff, and property. | Vital interests |
| CCTV footage to deter and prevent criminal activities such as vandalism, theft, and unauthorized access. | Vital interests |
| CCTV footage to provide evidence to law enforcement agencies in the event of an incident. | Legal obligation |
| CCTV footage to monitor the proper use and maintenance of the facility. | Legitimate interests |

Who we share your personal data with

When you become a member of the Club, your information, if you are a coach or volunteer will be or if you are another participant may be (depending upon which league(s) your team plays in) entered onto the Whole Game System database, which is administered by the FA. We also pass your information to the County FA and to leagues to register participants and the team for matches, tournaments or other events, and for affiliation purposes.

We may share your personal data with selected third parties, suppliers and sub-contractors such as referees, coaches or match organisers. Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions.

We may disclose your personal information to third parties to comply with a legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

The Club's data processing may require your personal data to be transferred outside of the UK. Where the Club does transfer your personal data overseas it is with the sufficient appropriate safeguards in place to ensure the security of that personal data.

Personal details of hirers of Coopers Edge Sports Hub will be retained for a reasonable timeframe after the last hire.

Protection of your personal data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

How long we hold your personal data

We keep personal data on our participants and members while they continue to be a participant or member or are otherwise actively involved with the Club. We will delete this data 12 months after a participant or member has left or otherwise ended their membership or affiliation, or sooner if specifically requested and we are able to do so. We may need to retain some personal data for longer for legal or regulatory purposes. The personal data that is stored on Whole Game System is subject to their privacy policy so we advise you review that policy together with this notice. If you would like your personal data to be deleted from Whole Game System then please contact them.

As covered in the CCTV section of this notice, video footage of individuals in and around the sports facility will be collected and stored securely for a maximum of 30 days, unless required longer for an investigation. Access to footage is restricted to authorised personnel only.

Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership.

We may update this Privacy Notice from time to time, and will inform you to any changes in how we handle your personal data.

If you have any questions about this Privacy Notice then please contact our Club Secretary.

Data Protection Impact Assessment (DPIA) for Barnwood United AFC CCTV Installation

Date of assessment: Friday 7th June 2024

1. Nature, Scope, Context, and Purposes of Processing

Barnwood United AFC proposes to install additional CCTV cameras at the Coopers Edge Sports Hub in Gloucester, UK. This involves capturing and processing video footage of individuals in and around the sports facility, as an upgrade from the existing front entrance camera.

Scope

The CCTV system will cover key areas of the sports hub, including the entrances, exits, car parks, and the main playing fields. Cameras will operate 24/7 and will record video footage continuously, with data being stored for a maximum of 30 days unless required for specific incidents.

Context

The Coopers Edge Sports Hub is a community sports facility used by various age groups and community members. It hosts sports events, training sessions, and other community activities. The area has seen regular incidents of vandalism, theft, and unauthorised access, necessitating enhanced security measures.

Purposes

The primary purposes of the CCTV installation are:

- Enhancing the safety and security of individuals using the sports hub.
- Deterring and preventing criminal activities such as vandalism, theft, and unauthorised access.
- Providing evidence to law enforcement agencies in the event of criminal incidents.
- Monitoring the facility to ensure the proper use and maintenance of the premises.

2. Necessity, Proportionality, and Compliance Measures

The installation of CCTV cameras is deemed necessary to address specific security concerns at the Coopers Edge Sports Hub. Alternative measures such as increased physical patrols and improved lighting have been considered and implemented but found insufficient in deterring and documenting criminal activities effectively.

Proportionality

The use of CCTV is proportionate to the security issues identified. The cameras will be strategically placed to cover areas prone to incidents while avoiding excessive surveillance

of private or non-relevant areas. Signage will inform individuals of the presence of CCTV, and access to footage will be strictly controlled.

Compliance Measures

- Compliance with the UK Data Protection Act 2018 and the GDPR.
- Clear signage indicating CCTV usage, ensuring transparency.
- Restricted access to recorded footage to authorised personnel only.
- Regular reviews of the CCTV system's effectiveness and data protection impact.
- Secure storage of footage with encryption and access controls.
- Data retention policies limiting storage to 30 days unless needed for investigations.

3. Identification and Assessment of Risks to Individuals

Risk 1: Invasion of Privacy

Individuals using the Sports Hub may feel their privacy is invaded by constant surveillance.

Risk 2: Unauthorized Access to Footage

Footage could be accessed by unauthorised personnel, leading to potential misuse.

Risk 3: Data Breach

A data breach could result in the exposure of personal data contained in the footage.

4. Additional Measures to Mitigate Risks

Mitigation Measure 1: Privacy Impact

- Position cameras to minimise the capture of irrelevant areas.
- Use technology to blur or mask irrelevant sections of the footage if necessary.

Mitigation Measure 2: Access Control

- Implement strict access controls, allowing only trained and authorised personnel to access CCTV footage.
- Maintain logs of access to footage for accountability.

Mitigation Measure 3: Data Security

- Encrypt footage to protect against unauthorized access.
- Store footage in secure environments with robust cybersecurity measures.

Mitigation Measure 4: Regular Audits

- Conduct regular audits and reviews of the CCTV system to ensure compliance with data protection regulations.
- Update this DPIA as necessary based on audit findings or changes in usage.

5. Conclusion

The proposed CCTV installation at Coopers Edge Sports Hub by Barnwood United AFC is justified by the need to enhance security and safety. The measures outlined ensure that the processing of personal data via CCTV is necessary, proportionate, and compliant with legal requirements. Regular reviews and robust security controls will mitigate risks to individuals' privacy and ensure the system operates transparently and effectively.