

MAYPOLE FOOTBALL CLUB

Greenaleigh Road, Birmingham, B14 4JL



**ACCREDITED
CLUB** ★ ★
PART OF ENGLAND FOOTBALL



Chairman: James Walker | Vice Chairman: Callum Main | Secretary: Emma Harris | Treasurer: Harvey Harwood

Club Director: Adam Brazier | Club Director: Mukesh Hallan | Club Welfare Officer: Nikki Richards

Maypole FC Data Protection Policy AUG 26

<i>Club Policy Owner</i>	James Walker
<i>Responsible Members</i>	James Walker Callum Main Adam Brazier Mukesh Hallan Emma Harris Harvey Harwood Nikki Richards
<i>Latest Review Date</i>	August 2026
<i>Next Review Date</i>	August 2027

General Enquiries: info@maypolefootballclub.co.uk | Safeguarding Concerns: cwo@maypolefootballclub.co.uk

Website: www.maypolefootballclub.co.uk | Facebook: Maypole FC | Instagram: maypole.fc

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Maypole FC CIC is the data controller for personal information it decides how and why to use. This policy sets the minimum rules for everyone handling information on the Club's behalf.

1. Purpose and scope

The Club will comply with the UK GDPR, the Data Protection Act 2018 as amended, and the Privacy and Electronic Communications Regulations 2003 where relevant. This policy applies to directors, committee members, employees, coaches, volunteers and contractors, and covers paper and electronic information about players, parents or guardians, staff, volunteers, officials, supporters, visitors and suppliers.

2. Responsibilities

The Board is accountable for compliance. The Chairman coordinates privacy information, records, rights requests, breaches and training. Anyone with access must use information only for authorised Club work, maintain confidentiality, follow Club systems and report errors or incidents immediately. External processors must be approved and bound by written data-protection terms. New or high-risk uses of data must be assessed before they begin.

3. Our data protection principles

We will handle personal information lawfully, fairly and transparently; collect it for clear purposes; use only what is adequate, relevant and necessary; keep it accurate; retain it only as long as needed; protect it against loss, misuse, unauthorised access or disclosure; and keep evidence that we comply. Children merit particular protection, so information about them will be explained and handled in an age-appropriate way.

4. Information, purposes and lawful bases

Information: We may handle identity and contact details, dates of birth, emergency contacts, registration and attendance, eligibility and team records, payments, communications, photographs or video, incident and disciplinary information, health, disability or access needs, and staff or volunteer vetting, qualifications and training.

Purposes: We use it to administer membership, teams, training, matches, events and programmes; protect welfare and respond to emergencies; communicate and take payments; meet FA, league, insurance, funding and legal requirements; manage workers and volunteers; improve services; and promote the Club where appropriate.

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Lawful basis: For each purpose we identify and record an appropriate basis, normally contract, legal obligation, legitimate or recognised legitimate interests (including safeguarding where applicable), vital interests or consent. Health and other special-category information, and criminal-offence information, is used only where the additional UK GDPR and Data Protection Act conditions are met. Consent must be freely given, specific and informed, can be withdrawn, and is not used when another basis is more appropriate.

5. Children, images and communications

We collect only what is necessary, use clear language, involve a child according to their age and understanding, and use parental-responsibility arrangements where applicable. Photographs and video must follow the Club's safeguarding and consent process; image preferences will be respected and full names will not normally be published with a child's image. Club groups and platforms must be approved. Where a group exposes members' phone numbers, this must be explained before they are added. Contact lists, screenshots and personal details must not be shared outside authorised Club activity. Factual membership, fixture, payment and safety messages are service communications. Promotional emails, texts and direct messages will comply with PECR, use consent or another permitted route, and provide an easy opt-out.

6. Collection, transparency and accuracy

Information may come from the individual, a parent or guardian, authorised football systems, coaches, officials, referral partners or funders. A suitable privacy notice will explain the use at collection. The Club will check key registration, emergency and medical details at appropriate intervals, and individuals should promptly report changes. Information will not be reused for an incompatible purpose without a lawful basis and any required notice.

7. Access and security

Access is limited by role and need. Controls include approved systems, unique accounts, strong passwords and multi-factor authentication where available, device locks, secure transfers, backups, locked paper storage and confidential disposal. Personal email, storage accounts, devices or removable media must not be used unless specifically approved and secured. Recipients must be checked, and BCC or an approved platform used where other recipients should not see contact details. Everyone with access must complete appropriate training and maintain confidentiality after leaving their role.

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8. Sharing, processors and transfers

Only necessary information will be shared, where lawful, with bodies such as The FA, County FA, leagues and competition officials; venues; insurers; funders or commissioners; payment, payroll, IT and registration providers; medical or emergency services; safeguarding partners; police, local authorities or other statutory bodies. Before sharing, the Club will verify the recipient, purpose, lawful basis and secure method. We do not sell personal information. Processors must act only on documented instructions. Transfers outside the UK require an adequacy decision, approved safeguard or other lawful exception.

9. CPOMS

Maypole FC uses coaches' personal email addresses and full names to provide access to safeguarding and club management systems, including CPOMS, where a club-issued email address is not available. These details are used and processed solely for legitimate club purposes and are retained securely in accordance with this policy. Player information (full name and DOB) is also held on the system, solely for safeguarding and reporting purposes.

10. Retention and disposal

Records are kept only for the period set by the Club's retention schedule, taking account of the original purpose and legal, safeguarding, insurance, FA, league, employment and funding requirements. They are then securely deleted, destroyed or anonymised. Safeguarding and serious-incident records may need longer retention and restricted access. Withdrawal of consent does not require deletion where another lawful reason requires continued retention.

11. Individual rights and complaints

Depending on the circumstances, people may ask to be informed; access or correct their information; have it erased; restrict or object to its use; receive portable data; withdraw consent; or obtain human review of a significant solely automated decision. These rights are not absolute. The Club may verify identity and will respond without undue delay and within the statutory time limit. A child may exercise their own rights where they have sufficient understanding. Requests or concerns should be sent to the Data Protection Lead through the Club's published contact details or addressed to Maypole FC CIC, Greenaleigh Road, Birmingham B14 4JL. The Club will try to resolve complaints promptly. Individuals may also complain to the Information Commissioner's Office at ico.org.uk.

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12. Personal data breaches

A breach includes loss, theft, destruction, unauthorised access or disclosure, sending information to the wrong person, cyberattack, or loss of availability. Anyone who becomes aware of a suspected breach must immediately inform the Chairman, preserve evidence and follow instructions. The Club will contain and record every breach, assess risk, and notify the ICO without undue delay and within 72 hours where legally required. People affected will be informed without undue delay where the risk is high. Corrective action and lessons learned will be recorded.

13. Records, monitoring and review

The Club will keep proportionate records of processing purposes, lawful bases, consent, sharing decisions, processor terms, rights requests, breaches and relevant training. It will assess whether an ICO data protection fee is payable and register where required. The Board will review this policy at least annually and after a serious incident, material change in processing, systems or law. Breaches of this policy may result in access removal, disciplinary action or termination of a volunteer or contractor role.

Related documents: privacy notice; safeguarding policy; photography/video consent; retention schedule; data-breach procedure; acceptable-use and communications rules.

Legal framework: UK GDPR; Data Protection Act 2018 (as amended); Privacy and Electronic Communications Regulations 2003. Current regulator guidance: ico.org.uk.

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