

The Sulgrave Club

Data Protection Policy

Updated 24 March 2026 — Review Date: March 2027

Legal Framework

Before 31 December 2020, UK organisations that processed personal data were bound by the EU GDPR and the UK Data Protection Act 2018 (DPA 2018). After Brexit, the UK GDPR replaced the EU GDPR as part of UK law.

Since June 2025, the **Data (Use and Access) Act 2025 (DUAA 2025)** has amended the DPA 2018 and UK GDPR. The DUAA refines rules on lawful processing bases, subject-access requests, automated decision-making, complaints, cookies, and ICO powers.

The Privacy and Electronic Communications Regulations (PECR) continue to sit alongside the DPA 2018 and UK GDPR.

The Sulgrave Club is committed to processing data in accordance with the UK GDPR, the DPA 2018 (as amended by the DUAA 2025), and the PECR.

Data Protection Principles

Everyone responsible for using personal data must follow strict rules called “data protection principles.”

They must make sure the information is:

- used fairly, lawfully, and transparently
- used for specified, explicit purposes
- adequate, relevant, and limited to only what is necessary
- accurate and where necessary, kept up to date
- kept for no longer than is necessary
- handled securely to protect confidentiality and integrity

The Sulgrave Club is responsible for and must demonstrate compliance with these principles.

These principles continue to underpin processing, with an expectation that organisations conduct **reasonable and proportionate searches** when responding to data-subject requests.

There is stronger legal protection for more sensitive information, such as:

- race
- ethnic background
- political opinions

- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation.

There are separate safeguards for data relating to criminal convictions and offences.

Your Rights

Under the DPA 2018 (as amended) you have the right to:

- be informed about how your data is used
- access your personal data
- have incorrect data corrected
- have data erased
- restrict processing
- obtain and reuse your data for portability
- object to processing in certain circumstances
- challenge automated decision-making and profiling

Additional rights introduced by the DUAA 2025 include:

- a **right to a timely explanation** of any fully automated decision with legal or similar significant effect, and to request human review;
- a **statutory right to complain directly to the organisation** before escalating to the Information Commissioner's Office (ICO);
- a **"stop-the-clock" mechanism** allowing the one-month response period for a subject access request to be paused while waiting for necessary information from the requester.

Policy

This policy sets out how The Sulgrave Club collects, uses, maintains, and discloses information obtained from members, staff, volunteers, trustees, and other stakeholders.

The Sulgrave Club is committed to ensuring your privacy is protected. Any information you provide will be used only in accordance with this policy.

Why this Policy Exists

This data-protection policy ensures that The Sulgrave Club:

- complies with data-protection law and follows good practice;
- protects the rights of all stakeholders;
- is open about how it stores and processes data;

- protects itself from the risks of a data breach; and
- complies with recent legislative updates introduced by the DUAA 2025.

General Provisions

- This policy applies to all personal data processed by the Club.
- The Club Manager is responsible for ongoing compliance.
- The policy is reviewed annually or whenever the law or ICO guidance changes.
- The Sulgrave Club is registered with the Information Commissioner's Office as a data controller.

Lawful, Fair and Transparent Processing

- The Club shall maintain a Register of Systems detailing all contexts in which personal data is processed, reviewed annually.
- Individuals have the right to access their personal data and requests will be responded to promptly.
- The Club recognises the new lawful basis of **Recognised Legitimate Interests** for certain public-interest or low-impact processing activities.

Lawful Purposes

- All data must be processed on a lawful basis: consent, contract, legal obligation, vital interests, public task, legitimate interests, or recognised legitimate interests.
- Evidence of consent is retained where required, and withdrawal of consent will be promptly respected.
- Research purposes are interpreted broadly and may include commercial or collaborative projects, provided appropriate safeguards are in place.

Data Minimisation, Accuracy and Archiving

- The Club ensures that personal data is adequate, relevant, and limited to what is necessary, kept accurate and up to date, and retained only for as long as necessary.
- Retention periods and secure destruction methods are reviewed regularly to ensure compliance with latest guidance.

Security and Confidentiality

- The Sulgrave Club protects personal information against loss of confidentiality, integrity, or availability while maintaining efficient service delivery.
- Data is stored securely using current software and encryption standards; access is limited to authorised staff; deleted data is made irrecoverable; and back-up and disaster-recovery procedures are in place.
- The Club also follows emerging cyber-security and resilience requirements and will comply with the Online Safety Act 2025 where digital youth engagement is relevant.

Breach

In the event of a security breach leading to destruction, loss, alteration, unauthorised disclosure of or access to personal data, the Club will promptly assess the risk to individuals and, where appropriate, report to the ICO in line with DUA 2025 requirements. All breaches and responses will be documented.

Contact and Complaints

If you have questions about this policy or our data-processing activities, please contact us:

The Sulgrave Club, 287 Goldhawk Road, London W12 8EU

Tel 020 8748 3561 | Email info@thesulgraveclub.org.uk

Please mark correspondence for the attention of the Club Manager or the Chair of the Management Committee.

Individuals also have a statutory right to submit a complaint directly to The Sulgrave Club and receive a formal response before escalating concerns to the Information Commissioner's Office at www.ico.org.uk.

Consultation and Commitment to Review

The Sulgrave Club is committed to regularly reviewing and updating its policies through consultation with employees, volunteers, and young people via the Sulgrave Youth Forum.

Employee and volunteer representation is provided by Nick Sazeides.

This policy was reviewed and approved by the Management Committee on Tuesday 24 March 2026.

Next review: March 2027

Appendices

Appendix 1: Register of Systems

Appendix 2: Subject Access Requests

Appendix 1 - Register of Systems

How and when we collect information

We collect personal data from our users by consent when:

- we ask parents/carers to complete an online Youth Club Membership Form on behalf of their child;
- we ask parents/carers to complete an online Booking & Consent Form on behalf of their child for a place on one of our Youth Club nights, After-School Clubs, Holiday Schemes, Residentials, or any other on-site or off-site activity;
- we ask young people to complete an online Senior Youth Club Membership Form.

We collect personal data from Trustees, Management Committee Members, Staff and Volunteers by consent when:

- we ask them to complete information / contact forms, electronically or in paper form, at the outset of their respective roles at the Club;
- they voluntarily give us their details, electronically or in paper form.

Parents and carers filling in online forms for those under 16 years of age are consenting to us collecting and holding data on their behalf.

The types of information we collect

We collect the following information from users and members:

Information	Stored in paper form	Stored electronically
Child / young person's name		✓
Address		✓
Post Code		✓
Date of birth		✓
Age		✓
Gender		✓
Ethnicity		✓
School attending		✓
School year		✓
Medical condition, disabilities, special education needs		✓
Attendance records		✓
Parent/carer names		✓
Relationships to child		✓
Contact telephone numbers		✓
Photographic consent		✓
In loco parentis consent		✓

We collect the following information from Staff:

Information	Stored in paper form	Stored electronically
Name	✓	✓
Address	✓	✓
Telephone / Mobile No	✓	✓
NI Number	✓	✓
Date of Birth	✓	✓
Gender		✓
Ethnicity		✓
Name of bank	✓	✓
Bank address	✓	✓
Account number	✓	✓
Sort code	✓	✓
Account name	✓	✓

We collect the following information from Trustees, Management Committee members and Volunteers:

Information	Stored in paper form	Stored electronically
Name	✓	✓
Address	✓	✓
Telephone / Mobile No	✓	✓
Email address	✓	✓
Ethnicity	✓	✓
Date of Birth	✓	✓

Photographs, films and videos of children and young people engaged in Sulgrave Club activities are selectively displayed in the Club, on our website, on our social media platforms, or in other Sulgrave Club related publicity, by consent only.

All paper records are stored securely in our locked office. All electronic data, including photographs, are stored on our computers, in our locked office, which are used only by staff who have secure passwords.

Who has access to your information

We will not sell or rent out your personal data to third parties. All the personal information we hold is processed by our staff either in person or by password protected, secure remote access to the computers in our offices at 287 Goldhawk Road, London W12 8EU.

Information on young people aged 11+ years who attend our Senior Youth Club, currently held on Thursday and Saturday nights, or our Inters Youth Club, currently held on Friday nights, is also recorded on the IYSS, a database system managed by the London Borough of Hammersmith & Fulham. This is a contractual requirement of their funding. Individuals who

provide us with data which is recorded on IYSS are informed of this use when data is requested from them. For more information on the Data Protection Policy of the London Borough of Hammersmith & Fulham, please visit their website: www.lbhf.gov.uk

We employ an IT company, SomaData Consultancy Ltd, to manage all our IT requirements. For more information on their Data Protection policy please contact Somadata Consultancy Ltd, m. +44 (0) 7917 412 049, email: getintouch@somadata.co.uk

How long information is kept

We will hold your personal information on our systems for as long as is necessary for the relevant activity, and/or in accordance with your informed consent, and/or as long as we are legally required to hold it to fulfil our statutory obligations.

When no longer required all personal data stored in hard copy form will be shredded prior to disposal, and all personal data stored in electronic form will be erased from all relevant databases, spreadsheets, and electronic lists.

The Club Manager shall be responsible for determining when data should no longer be stored and for ensuring its safe and secure destruction. This will usually be for a period of six years after your last interaction with us.

We review our retention periods for personal information on a regular basis.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. We do not use cookies to gather personal information about you. By accepting cookies from our website, you consent to Google processing data about your activity. You may block cookies by selecting the appropriate settings in your browser, but this may affect the full functionality of the website. When directed to visit a third-party website, you may be asked to accept cookies. You should check the third-party website for more information about these.

Appendix 2 - Subject Access Requests

Anybody who makes a request to see any personal information held about them by The Sulgrave Club is making a subject access request. All information relating to the individual, including that held in electronic or manual files should be considered for disclosure.

All requests should be sent to the Club Manager and must be dealt with in full without delay and at the latest within one month of receipt.

Any individual may appoint another person to request access to their records. In such circumstances The Sulgrave Club must have written evidence that the individual has authorised the person to make the application and the Club Manager must be confident of the identity of the individual making the request and of the authorisation of the individual to whom the request relates.

Access to records will be refused in instances where an exemption applies, for example, information sharing may place the individual at risk of significant harm or jeopardise police investigations into any alleged offence(s).

A subject access request must be made in writing. The Sulgrave Club may ask for any further information reasonably required to locate the information.

An individual only has the automatic right to access information about themselves, and care needs to be taken not to disclose the personal data of third parties where consent has not been given, or where seeking consent would not be reasonable, and it would not be appropriate to release the information. Particular care must be taken in the case of any complaint or dispute to ensure confidentiality is protected.

All files must be reviewed by the Club Manager before any disclosure takes place. Access will not be granted before this review has taken place.

Where all the data in a document cannot be disclosed a permanent copy should be made and the data obscured or retyped if this is more sensible. A copy of the full document and the altered document should be retained, with the reason why the document was altered.