

# **The Sulgrave Club**

## **Data Protection Policy**

### **Legal Framework**

Before 31 December 2020, UK organisations that processed personal data were bound by two laws: the EU GDPR (General Data Protection Regulation) and the UK DPA (Data Protection Act) 2018. After 31 December 2020, the EU GDPR no longer applied directly in the UK. However, UK organisations must still comply with its requirements.

First, the DPA 2018 enacts the EU GDPR's requirements in UK law. Second, the UK government has issued a statutory instrument – the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 – which amends the DPA 2018 and merges it with the requirements of the EU GDPR to form a data protection regime for the UK known as the UK GDPR.

The Privacy and Electronic Communications Regulations (PECR) sit alongside the Data Protection Act and the UK GDPR. They give people specific privacy rights in relation to electronic communications.

The Sulgrave Club is committed to processing data in accordance with its responsibilities under the UK GDPR and 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
- used in a way that is 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 in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction, or damage

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 personal data relating to criminal convictions and offences.

## **Your rights**

Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you.

These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests

## **Policy**

This Data Protection Policy sets out how The Sulgrave Club collects, uses, maintains, and discloses information that it collects from you as a user, member, friend, supporter, trustee, management committee member, volunteer, staff member, or any other stakeholder of the Club. The Sulgrave Club is committed to ensuring your privacy is protected. Should we ask you for certain information by which you can be identified, be assured it will only be used in accordance with this Data Protection policy.

## **Why this policy exists**

This data protection policy ensures 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 individuals' data.
- Protects itself from the risks of a data breach.

## **General provisions**

- This policy applies to all personal data processed by the Charity.
- The Club Manager shall take responsibility for The Sulgrave Club's ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Sulgrave Club shall register with the Information Commissioner's Office (ICO) as an organisation that processes personal data.

## **Lawful, fair, and transparent processing**

- To ensure its processing of data is lawful, fair, and transparent, The Sulgrave Club shall maintain a Register of Systems, a register of all systems or contexts in which personal data is processed by The Sulgrave Club. (Please see Appendix 1: Register of Systems.)
- The Register of Systems shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to The Sulgrave Club shall be dealt with in a timely manner. (For more detailed information, please see Appendix 2: Subject Access Requests.)

### **Lawful purposes**

- All data processed by The Sulgrave Club must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task, or legitimate interests (see ICO guidance for more information).
- The Sulgrave Club shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent shall be clearly available and systems shall be in place to ensure such revocation is reflected accurately in The Sulgrave Club's systems.

### **Data minimisation**

- The Sulgrave Club shall ensure that personal data is adequate, relevant, and limited to what is necessary re the purposes for which it is processed.

### **Accuracy**

- The Sulgrave Club shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### **Archiving / removal**

- To ensure that personal data is kept for no longer than necessary, The Sulgrave Club shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- The archiving policy shall consider what data should/must be retained, for how long, and why.

### **Security and Confidentiality**

- The Sulgrave Club's processes for handling personal information will ensure that it is protected from the loss of confidentiality, integrity, and availability while being managed in such a way that services can be provided efficiently and effectively.
- The Sulgrave Club shall ensure that personal data is stored securely using modern software that is kept up to date.

- Access to personal data shall be limited to personnel who need access and appropriate security shall be in place to avoid unauthorised sharing of information.
- When personal data is deleted, this shall be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

### **Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, The Sulgrave Club shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

### **Contact and complaints**

If you have any queries about this Data Protection policy or how we process your personal data you may contact us on 020 8748 3561, email us at [info@thesulgraveclub.org.uk](mailto:info@thesulgraveclub.org.uk) or write to us at The Sulgrave Club, 287 Goldhawk Road, London W12 8EU. Please mark all enquiries for the attention of the Club Manager. Alternatively, you can contact the Chairman of the Management Committee via our office.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner's Office via their website: [www.ico.org.uk](http://www.ico.org.uk)

### **Consultation and Commitment to Review**

The Sulgrave Club is committed to the review and updating of its policies and procedures through consulting with its employees, volunteers, and young people. Employees and volunteers will be consulted on changes to policies through staff meetings and young people through the Sulgrave Youth Forum.

The employees' and volunteers' representative is Nick Sazeides.

This policy was updated, reviewed, and approved by the Management Committee of The Sulgrave Club at their bi-monthly meeting on Tuesday 20th May 2025.

*Review date: May 2026*

### **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/carers names		✓
Relationships to child		✓
Contact telephone numbers		✓
Photographic consent		✓
In loco parentis consent		✓

We collect the following information from Staff:

<b>Information</b>	<b>Stored in paper form</b>	<b>Stored electronically</b>
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:

<b>Information</b>	<b>Stored in paper form</b>	<b>Stored electronically</b>
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](http://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](mailto: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.