NEWHAM SPORTS CLUB
PROGRESSIO CUM POPULO

DATA PROTECTION

POLICY

ADOPTED	NEXT REVIEW	OWNER
01/09/2026	September 2027	Newham Sports Club Board

01 POLICY STATEMENT

We process personal information fairly, lawfully and transparently, in accordance with UK GDPR and the Data Protection Act 2018. As a community sports organisation working extensively with children and young people, we take particular care with their data, following ICO guidance that children's personal data merits specific protection because they may be less aware of the risks involved.

02 WHAT DATA WE COLLECT

- Personal identification: full name, date of birth, ethnicity
- FSM eligibility and SEND information (where relevant to a programme, e.g. HAF)
- Contact details and emergency contact details, including parent/carer information
- Attendance and participation records
- Photos/video, where consent has been given (see the Photography, Image & Social Media Consent Policy)
- Safeguarding records, held separately and more securely (see the Safeguarding Policy, §8)

03 OUR LAWFUL BASIS FOR PROCESSING

- **Consent** — for photos/video and optional communications.
- **Legitimate interests** — for running programmes, managing registrations, and safety/emergency contact purposes, balanced against participants' rights.
- **Legal obligation** — where safeguarding law requires us to share or retain information.
- **Vital interests** — in an emergency, to protect someone's immediate safety.

Special category data (e.g. SEND, ethnicity) is processed under UK GDPR Article 9 conditions relevant to safeguarding, equality monitoring, or substantial public interest, with appropriate additional care.

04 HOW WE COLLECT DATA

Directly from participants/parents at registration, or via a referral organisation (e.g. a school or the local authority) for programmes like HAF.

05 HOW WE USE DATA

- Managing registrations, sessions and attendance
- Safeguarding all participants (see the Safeguarding Policy)

- Reporting to funders on eligible participants — aggregated or anonymised wherever possible; identifying data is only shared with a funder where their reporting requirements need it (e.g. a funder's own M&E reporting template) and always under a data-sharing understanding with that funder
- Emergency contact
- With consent, contacting families about future provision

06 HOW WE STORE DATA

- Stored on password-protected cloud services; safeguarding records are stored separately with more restricted access (see the Safeguarding Policy, §8).
- Retained for a maximum of 3 years, or as required by a funder's conditions, whichever is longer — except safeguarding records, which follow the retention period in the Safeguarding Policy.
- Data no longer needed is permanently deleted, not just archived.

07 PARTICIPANTS' RIGHTS

Everyone whose data we hold can: access it, correct it, ask us to erase it, restrict or object to its processing, and request it be transferred elsewhere — subject to the usual UK GDPR conditions and exceptions (for example, we cannot erase a safeguarding record where retaining it is required by law or necessary to protect a child). We respond to any request within one month.

08 SAFEGUARDING AND INFORMATION SHARING

Where sharing personal information is necessary to protect a child or adult at risk from harm, data protection law does not stand in the way — see the Safeguarding Policy, §7, for how this is balanced in practice.

09 CONTACT US

info@newhamsports.org

10 THE REGULATOR

If you're not satisfied with how we've handled a data protection concern, you can contact the Information Commissioner's Office: 0303 123 1113, or via ico.org.uk/make-a-complaint.

11 REVIEW

Reviewed annually, alongside the Safeguarding Policy. **Next review: September 2027.**

ADOPTION

Approved and formally adopted by the Newham Sports Club Board.

ROLE	NAME	SIGNATURE	DATE
Chair	Naser Mohamed		01/09/2026
Treasurer & Deputy Safeguarding Lead	Abdirahman Mohamed		01/09/2026
Secretary & Governance Officer	Uthman Sanusi Mohammed		01/09/2026

Adoption date: 01/09/2026 · **Next review:** September 2027