**INDEPENDENT SCHOOLS FOOTBALL ASSOCIATION**

**DATA PROTECTION POLICIES**

The Independent Schools Football Association Limited will comply with the General Data Protection Regulation (GDPR) which will apply in the UK from 25 May 2018

Under the GDPR, the data protection principles set out the main responsibilities for organisations. The GDPR requires ISFA to show **how** it complies with these principles – for example by documenting the decisions it takes about a processing activity. This document aims to satisfy this requirement

Article 5 of the GDPR requires that personal data shall be:

(a) processed lawfully, fairly and in a transparent manner in relation to individuals;

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Article 5(2) requires that

“the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

**Consent** under the GDPR must be a freely given, specific, informed and unambiguous indication of the individual’s wishes. There must be some form of clear affirmative action – or in other words, a positive opt-in.

Relevant information held by ISFA falls into four categories.

* Bank accounts and personal details of employed staff
* Contact details for teachers in charge of football at ISFA member schools (including e-mails and phone numbers)
* Personal details of children involved in the ISFA representative programme (including parental contact details, e-mails and phone numbers and medical details)
* Contact details for all applicants for tickets to ISFA cup finals and events

**Bank accounts personal contact details and references supplied on appointment of employed staff**

* This information is provided by staff themselves so consent has been obtained.
* The purpose of holding this information is in order to communicate with, make payment of salaries to and make PAYE/NIC payments for employed staff.
* This information is held by the Chief Executive of ISFA and ISFA’s Payroll Officer.
* This information held by ISFA is available to ISFA staff upon request to the Chief Executive of ISFA and will be rectified or erased upon request
* This information will be deleted by ISFA when the member of staff concerned leaves ISFA employment
* ISFA will not pass on this information to any third party

**Contact details for teachers in charge of football at ISFA member schools (including e-mails and phone numbers)**

* This information is provided by the teachers and schools concerned so consent has been obtained.
* The purpose of holding this information is in order to contact schools to inform them of ISFA events, organisation and opportunities to participate.
* This information is collated by ISFA’s Competitions & Events Manager. It is distributed to key staff: the Chief Executive, the Football Development Manager and the Head of Elite Player Development. Relevant parts of the information will be sent to ISFA staff responsible for organising activities in specific areas of the country.
* This information held by ISFA is available upon request. This information is updated every year by schools re-applying for affiliation. Schools can also inform ISFA if they wish to change their teacher in charge so contact outdated details will be deleted by ISFA when the member of staff concerned changes.
* ISFA will not pass on this information to a third party.

**Personal details of children involved in the ISFA representative programme (including parental contact details, e-mails and phone numbers, medical details and consent form)**

* This information is provided by parents so consent has been obtained from parents (or guardian if applicable).
* The purpose of holding this information is in order to contact players/parents and inform them of the arrangements for ISFA representative events. It is also important that ISFA is in possession of relevant medical information at representative camps and in the event of emergency.
* This information is collated and held by the ISFA’s Representative Football Administration Officer. Relevant information will be provided to ISFA staff in charge or residential camps and other events. For regional representative teams, the information will be collated by regional officers who will hold the information on behalf of ISFA and abide by the policies of ISFA outlined in this document.
* Medical records and consent forms online will be secured by means of each parent’s individual password.
* The information held by ISFA is available upon request to parents, who are free to change any personal details on each occasion that they enrol for a camp or at any other time they choose by informing ISFA.
* ISFA will delete all medical details once a player leaves permanently the ISFA representative programme. However, ISFA may retain contact details (eg e-mail) in order to make future contact, provide information, etc.
* ISFA will not pass on this information to any third party.
* ISFA staff must not use this information for their own purposes or benefit or for business reasons

**Contact details for all applicants for tickets to ISFA cup finals and events**

* This information is provided by applicants themselves so consent has been obtained.
* The purpose of holding this information is in order to accept bookings and distribute tickets.
* This information is collated and held by the ISFA Competitions & Events Manager
* These details will be deleted once the event has taken place.
* ISFA will not pass on this information to any third party.

**Accountability and Governance**

ISFA will ensure that all ISFA staff holding data outlined in this document are informed of ISFA’s policies.

**SMALLPRINT**

**(to be included on online membership applications, bookings for rep camps and cup final tickets, etc.)**

The information supplied will be held by The Independent Schools Football Association Limited, 5 Butler’s Court, Queen Elizabeth Crescent, Beaconsfield, Bucks HP9 1BX.

The information will be held for the purpose of ……………

You have the right to withdraw your consent at any time (rep camps)

This information held is available upon request to and may be rectified or erased upon request.

ISFA will not pass on this information to any third party.

Full details of ISFA’s Data Protection Policy is available on the ISFA website.