



# Privacy Policy

<b>Version number</b>	002	<b>Version expiry</b>		<b>Document Type</b>	POL Policies	<b>Document ID</b>	
<b>Version date</b>	May 2024	<b>Version status</b>	Live document	<b>Business Area</b>	Safeguarding	<b>Document classification</b>	INTERNAL USE ONLY

### Preface and document control

This document is intended to provide information in respect of SAFC policy, procedure, standards or guidance and will be periodically updated to reflect any changes due to business requirements or infrastructure. Neither all nor part of this document shall be reproduced or released for commercial purposes by a recipient without the express consent of the stated SAFC document owner. This document **MUST** be reviewed and approved by the designated SAFC document approver(s) to ensure technical accuracy and business validity prior to publication.

#### Document owner and approver(s)

<b>Owner</b>	Head of Academy Operations
<b>Approver(s)</b>	Board

#### Version control

Version	Version date	Document History
001		

#### External use

The document owner must approve any request for a copy of this document to be released to an external party. Consideration must be given to the content and classification of this document before authorisation is granted. The owner of this document must state the distribution format(s), copying permissions and procedures for document return or disposal.

- 1.0. Executive Summary
- 2.0. Policy Aim & Applicability
- 3.0. Definition of terms
- 4.0. Policy Scope and Purpose
- 5.0. Player Recognition System
- 6.0. ECMS
- 7.0. Teamworks
- 8.0. Legislation and Guidance

## 1.0. Executive Summary:

1.1. SAFC acknowledges their duty of care to protect the personal data of all stakeholders. This policy sets out how the Club acts in such a way as to protect personal data and ensure its staff understand the rules governing the use and storage of personal information to which they have access as part of their roles and responsibilities. 4

## 2.0. Policy Aim & Applicability

**2.1.** The Club holds a large amount of personal data. This relates to job applicants, players, parents, Academy scholars, host families, our employees, sponsors, suppliers, fans and many other stakeholders. We use this information for a variety of business purposes. The Club's policy is to process personal data in accordance with any applicable data protection laws and the rights of individuals.

**2.2.** This policy currently applies to the following companies within the Sunderland Group: Sunderland Limited; Sunderland Association Football Club Limited, Sunderland Football Women and Girls Limited; All actively trading subsidiary companies of Sunderland Football Club Limited. This policy also applies to the global transfer or receipt of data.

## **3.0. Definition of terms**

**3.1.** 'ECMS' refers to 'My Concern' – the Club's Electronic Case Management System.

**3.2.** 'EFL' refers to the English Football League.'

**3.3.** LMS' refers to the Learning Management System.

**3.4.** 'Personal Data' refers to any information about an individual from which that individual can be identified.

**3.5.** 'PMA' refers to the Performance Management Application.

**3.6.** 'PRS' refers to the Player Recognition System

## 4.0. Policy scope & Purpose

**4.1.** We collect, use, store and transfer some personal data of our participants and their parents or guardians, and other Club members. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

**4.2.** This policy sets out how the Club acts in such a way as to protect personal data and ensure its staff understand the rules governing the use and storage of personal information to which they have access as part of their roles and responsibilities.

**4.3.** You provide information about yourself when you register with the Club, and by filling in forms at an event, online, via an application (Teamworks) or by corresponding with us by phone, e-mail or otherwise.

### **The information we collect includes, but is not limited to:**

- Your name, date of birth, address, e-mail address, phone number, gender, and the contact details of third parties in the case of emergency.
- Any consents you have given us.
- Photo or video footage (we will only do this with specific image consent)
- We may also ask for relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding.
- Where we need to collect personal data to complete Club registration and you do not provide that data, we may not be able to honour or administer your registration

## 5.0. Player Recognition System

5.1. Each Academy player will be issued with a PRS Card by the EFL on registration.

5.2. The PRS uses photo ID cards (PRS cards) and bespoke technology to validate eligibility and record attendance at all Academy fixtures and events.

5.3. The PRS fulfils the following objectives:

- To maintain a safe environment for Academy players, trialists and staff
- To ensure the games programme is monitored effectively
- To allow recording of Academy players game time
- To facilitate club administrative duties.

5.4. It is the responsibility of the Academy player to ensure the PRS card or alternative photo ID (where applicable) is available. 'Games Programme Monitors' will attend fixtures and administer inspections. PRS cards may be inspected prior, during or after matches.

5.5. Any lost or damaged PRS Card must be reported to the Club who will then inform the EFL. A new card will be printed and there will be a cost incurred, payable by the Player's parent/carer.

5.6. In respect of the PRS, the EFL will access the following registration data which it currently holds:

- Academy Player Name
- Academy Player Registration Number
- Academy Player Registration Status.

5.7. Additionally, the PRS will require the following data which it may not currently hold:

- Academy Player Image.

5.8. The EFL will store the image securely in the PRS, which links to the Football Administration System: the image may be used in other EFL systems which the player uses, such as the PMA and the LMS. If a player leaves the Club, their image will be securely deleted by the English Football League (though another image may need to be taken and uploaded to the PRS in the event of the player registering with another club). Any such image will be used as set out in this Privacy Notice, or as otherwise notified at the time.

5.9. The use of the PRS is supported by the EFL Youth Development Rules and Youth Development Charter.



## 6.0. ECMS

- 6.1.** The Club use a secure ECMS system on which to record and store any correspondence, contextual information and/or incidents relating to our players and staff.
- 6.2.** This is managed by the Head of Safeguarding and can be shared with key members of staff as deemed appropriate in order to safeguard children and young people.
- 6.3.** A record on the ECMS is only logged if additional context/ circumstances requires it and will only be held for as long as your child is registered with our Academy, when it will be archived securely on the system.
- 6.4.** Your consent for us to store this information and share it with key staff is assumed unless you write to us specifically to withdraw this consent.
- 6.5.** Where they are Child Protection or Criminal proceedings, however, we are permitted to record information and share it with other agencies (e.g. School, Children's Services and Police) without consent – this relates to both live and archived files.
- 6.6** For additional information or clarification regarding the type of information we hold, where it is stored and who it may be shared with, please contact [GDPR@safc.com](mailto:GDPR@safc.com)

## 7.0. TEAMWORKS

**7.1.** The Club use an Academy application platform to host player information, schedules, documents and provide a communication tool; amongst other uses.

**7.2.** This is managed by the Head of Academy Operations and has several staff as “admin” users with access to all stored data within the platform.

**7.3.** Other users, such as staff, players and parents, all have an access level that is appropriate to their role and are able to see only specific information that is deemed appropriate to them.

**7.4.** By downloading the application, players and parents consent for their information to be stored and shared as deemed appropriate with stakeholders.

**7.5** For additional information or clarification regarding the type of information we hold, where it is stored and who it may be shared with, please contact [GDPR@safc.com](mailto:GDPR@safc.com)

## 8.0. Legislation and guidance.

8.1. Further information regarding the Club's Privacy Policy can be found at <https://www.safc.com/hygiene/privacypolicy>. Information relating to the EFL Privacy Notice is available at <https://www.efl.com/efl-privacy-notice>.

Sunderland Association Football Club  
[www.safc.com](http://www.safc.com)