



**MORECAMBE
FOOTBALL
CLUB**

GDPR & Data Protection Act (2018) Policy 2025



General Data Protection Regulations & Data Protection Act (2018) Policy, 2025

Policy Owner	Version	Issue Date	Review Date
MFC Board of Directors	2	31/03/2025	01/04/2026



General Data Protection Regulations (GDPR) Policy

Introduction

The General Data Protection Regulations (GDPR) came into force on 25th May 2018 together with the revised Data Protection Act (DPA) 2018. This GDPR continues to apply following the UK's exit from the European Union (EU) and therefore operates in tandem with the 2018 Act.

Morecambe Football Club (The "Club") aim to ensure that all personal data collected, stored, processed or destroyed about any person, is subject to the GDPR and the provisions of the DPA, whether a current or former member of staff, host-parent, parent, visitor and/or contractor.

Legislation

This policy meets the requirements of the GDPR and the provisions of the Data Protection Act (2018), which is based on guidance published by the Information Commissioner's Office (ICO).

Information Commissioner's Office

Data Controller

The Club is a "data controller". This means that Club is responsible for how data is held, stored and used regarding the processing of your personal data.

Data Processor

The HR & Senior Safeguarding Manager and/or General Manager process personal data on behalf of the controller.

Data Subject

The individual whose personal data is held or processed.

Consent

The Club does not need your consent when using special categories of your personal information in accordance with the Club's legal obligations, or to exercise specific rights in the field of employment law. In limited circumstances however, the Club may ask for your written consent to allow us to process certain sensitive data, whereby you will be given details of the information that the Club would like and for what reason.

The Data Protection Act (DPA) – '7' Principles

There are '7' principles that guide how the Club use personal data, these are: -

- 1. Lawfulness, fairness and transparency**
- 2. Purpose limitation** (*used for a specific purpose*)
- 3. Data minimisation** (*adequate and only for what is needed*)
- 4. Accuracy** (*accurate and up to date data held*)
- 5. Storage limitation** (*not kept longer than needed*)
- 6. Integrity and Confidentiality** (*security aspects of data*)
- 7. Accountability** (*kept safe and secure*)



What Type of Information does the Club hold about me?

The Club holds your personal data for identifiable purposes, such as your: -

- (a) Name, address, contact number(s) and email address(es)
- (b) Date of birth
- (c) Gender
- (d) Marital status and dependants
- (e) Next of kin and emergency contact information
- (f) National Insurance (NI) number
- (g) Bank account details, payroll records and tax information
- (h) Salary, annual leave, pension and benefits information
- (i) Date of joining the Club
- (j) Location of employment (Club; Academy, etc)
- (k) Onboarding ID documentation, including evidence of right-to-work, references and other information included in a CV or cover letter/application form
- (l) Employment record, including job title, work history, working hours/contract, training certification/records and professional memberships
- (m) Compensation history
- (n) Performance information
- (o) Disciplinary; Grievance; Sickness Absence, Capability (as applicable)
- (p) CCTV footage and other information obtained electronically
- (q) Information about your use of the Club's information and communication systems and
- (r) Photographs

There are also '**special categories**' of more sensitive personal data which require a higher level of protection, such as personal data in respect of race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health/medical information and sexual orientation. The Club may process special categories of personal information in the following circumstances: -

- (a) Where the Club needs to carry out legal obligations and in line with its Cyber Security & IT and Social Media Policies
- (b) Where it is needed in the public interest, such as for equal opportunities monitoring and where it is needed to access your working capacity on health grounds.

The Club may process this type of information where it is needed in relation to legal claims, or where it is needed to protect your interests (or someone else's) and you are not capable of giving your consent, or where you have already made the information public. The Club may also process such information about members or former members of staff in the course of legitimate business activities with appropriate safeguards.

The Club's Obligations

The Club will use sensitive personal information in the following ways: -

- (a) Use information relating to your leave of absence, including sickness or family related leave to manage any absences and comply with employment legislation, and other laws
- (b) Use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace, and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence(s).



- (c) Use information about your race, national/ethnic origin, gender, religious, philosophical or moral beliefs, age and sexual orientation, etc, to ensure meaningful equal opportunity monitoring and reporting

The Club may as part of their mandatory reporting responsibilities, collect data about your race or ethnicity, religious beliefs, age, gender and sexual orientation, and information about criminal convictions and offences

Criminal Conviction Information

The Club will only collect information about criminal convictions if it is appropriate given the nature of the role and where it is legally required. As part of the onboarding process, the Club will process DBS applications, and where applicable, collect information about any criminal convictions during the recruitment process or during the course of you working for the Club. It is your responsibility to inform us of any changes to any criminal conviction or potential criminal conviction during the course of your employment with the Club.

The Club may also process information about member or former members of staff in the course of legitimate business activities, with the appropriate safeguards.

Sharing Personal Data with Third Parties

The Club will share your personal data with other entities in the context of a possible sale or business reorganisation or restructuring exercise, for system maintenance support and hosting of data. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Your Duty to Inform the Club of any Changes

It is important that all your personal information that the Club holds about you is accurate and up-to-date. Please keep us informed if your personal information changes in any way during the course of your employment.

Your Rights

Under certain circumstances, you have the legal right to: -

- (a) Request Access to your personal information (Subject Access Request)
- (b) Request Correction of your personal information we hold about you.
- (c) Request Erasure of your personal information, allowing you to ask us to delete or remove your personal information, where there is no good reason for us continuing to use, process or store it.
- (d) Object to Processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- (e) Request the Restriction of Processing of your personal information. This enables you to ask us to suspend the processing of your personal information about you, for example, if you want us to establish its accuracy.
- (f) Request the transfer of your personal information to another party

IMPORTANT: If you want to change, verify, or request erasure of your personal information, object to the processing of your personal data, or request that the Club transfers a copy of your personal information to another party, please contact the HR Manager in advance and in writing.

Fees for Subject Access Requests are usually free of charge, however there may be certain circumstances where the Club may levy a reasonable fee, if the request is clearly unfounded or deemed excessive. Alternatively, we may refuse to comply with the request in such circumstances.



Future changes

The government outlined key data protection proposals in the King's Speech in 2024 emphasising the importance of data to the UK economy. The government plans include:

- Establishing a new Regulatory Innovation Office to modernise and coordinate regulations across different sectors to reflect the development of new technologies.
- Restructuring the ICO and providing it with stronger powers.
- A new Digital Information and Smart Data Bill (replacing the previous government's abandoned legislation) to modernise data protection laws, and establish services like the Digital Verification and Smart Data scheme which may, for example, facilitate pre-employment checks.
- Addressing cybersecurity with stronger protections for digital services and regulatory enforcement to address growing cyber threats as the UK has started to lag behind other countries in this area.
- Ensuring that data treatment preserves the UK's adequacy status for receiving EU data transfers to enable EU business after Brexit.

The Club reserves the right to update this GDPR & Data Protection Policy at any time, and any revisions can be obtained from your Head of Department or the HR Manager.

**If you're concerned about how an organisation is handling your personal data
Contact the ICO for advice or to make a complaint: -**

ICO

Telephone: 0303 123 1113

Textphone: 18001 0303 123 1113

Monday to Friday, 9am to 5pm

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

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I confirm that I have read and understood the above information on DATE:

EMPLOYEE NAME:

Signature: