



Data Protection Policy

NEWPORT COUNTY AFC

Document type	Risk Management Policy
Reviewed by	Shaun Bowden
Signed off by	Board of Directors
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1. Position and Values

Newport County AFC is committed to protecting the privacy, welfare and personal information of all players, staff, volunteers and parents associated with the Club. Effective data management is essential to supporting player development, safeguarding, operational delivery and the overall wellbeing of everyone connected to the Club.

The Club collects and processes personal information in order to:

- support football and educational development;
- monitor player and staff progress and welfare;
- manage safeguarding and medical provision;
- fulfil regulatory and legal responsibilities; and
- improve the services and support provided by the Club.

Examples of information collected may include attendance records, development reports, contact details, medical information, safeguarding records and other operational data required for the running of the Club.

Newport County AFC is committed to ensuring that all personal data is collected, processed, stored and shared responsibly, securely and transparently. The Club will keep players, parents, staff and stakeholders informed about what information is collected, why it is required and how it is used.

This policy also outlines the Club's procedures for the retention, storage and secure disposal of records relating to safeguarding concerns or potential risks posed by employees, volunteers or other individuals connected with the Club.

2. Our Commitment

In accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Newport County AFC will:

- process personal data fairly, lawfully and transparently;
- collect data only for specified, legitimate purposes;
- ensure data collected is relevant, adequate and limited to what is necessary;
- maintain accurate and up-to-date records;
- retain information only for as long as necessary;
- respect the rights of individuals regarding their personal data;
- ensure personal data is protected and stored securely; and
- ensure personal data is not transferred internationally without appropriate safeguards.

There may be circumstances where the Club is legally required, or where it is necessary in the best interests of a player, staff member or volunteer, to share information with external organisations. These may include:

- statutory agencies such as the Police or Social Services;
- governing bodies including The Football Association and English Football League;
- educational or safeguarding partners; and
- healthcare professionals or support services.

Any organisation receiving information from the Club will be expected to comply with applicable data protection legislation and maintain appropriate standards of confidentiality and security.

The Club recognises that children require particular protection in relation to their personal data. Newport County AFC will ensure that information provided to young people and parents is clear, accessible and age appropriate, enabling informed decisions about the sharing and use of personal information.

The Club is committed to transparency and will:

- explain how personal data is used;
- outline the safeguards in place to protect information;
- inform individuals of their rights; and
- explain how concerns or complaints can be raised.

Under no circumstances will Newport County AFC disclose personal information without lawful justification or fully informed consent where required, particularly where disclosure could:

- place a child or vulnerable person at risk of harm;
- compromise an individual's physical or mental wellbeing;
- involve confidential medical information;
- identify another individual without consent; or
- disclose confidential references or safeguarding information inappropriately.

3. Requesting Access to Data

Under the Data Protection Act 2018 and UK GDPR, individuals have the right to request access to personal information held about them by the Club.

Requests should be made in writing to the Club's Data Controller.

Club Data Controller

Shaun Bowden - Club Secretary & Senior Safeguarding Manager
shaun.bowden@newport-county.co.uk

Players, parents or carers may request access to development, welfare or medical records where appropriate and lawful to do so.

Records may include:

- player development plans;
- performance reviews;
- welfare records;
- medical information; and
- other relevant documentation held by the Club.

Parents or carers may submit requests on behalf of children where appropriate.

4. Biometric Data and Privacy Notices

The Club will not collect or process biometric information relating to any player without appropriate consent.

Where biometric data collection is proposed, Newport County AFC will provide a clear explanation covering:

- the type of biometric information collected;
- the purpose for which it will be used;
- how the information will be stored and protected; and
- the right to refuse or withdraw consent at any time.

5. Information Sharing and Safeguarding

Where safeguarding concerns arise, Newport County AFC may need to share information appropriately and lawfully in order to protect children, young people or vulnerable adults.

This may include concerns relating to:

- players;
- coaches or staff members;
- volunteers;
- individuals in positions of trust; or
- environments connected to football activities, events or tours.

The Club will follow current HM Government safeguarding guidance and recognised best practice principles when making decisions about information sharing.

The Club's safeguarding team will ensure that information sharing decisions are:

- necessary and proportionate;
- made in the best interests of the child or vulnerable person;
- shared only with appropriate individuals or organisations;
- accurate, timely and secure; and
- properly recorded.

Information may be shared with:

- Police and Children's Services;
- Local Authority safeguarding teams;
- the Disclosure and Barring Service (DBS);
- governing bodies and football authorities;
- other football clubs where safeguarding considerations require it; and
- designated Club safeguarding personnel on a strict need-to-know basis.

Safeguarding records are highly confidential and will only be disclosed where necessary to protect an individual from harm or where required by law.

6. Access to Data and Disclosure

Staff Access

Staff members have the right to access personal information held about them by the Club through a formal subject access request.

Access to player or staff data will be limited strictly to those who require the information in the course of their duties.

All staff are expected to comply fully with data protection legislation and Club policies. Any misuse, unauthorised disclosure or deliberate breach of data protection responsibilities may result in disciplinary action.

Disclosure to Third Parties

The Club will not disclose personal information to third parties without consent unless:

- there is a legal obligation to do so;
- it is necessary to safeguard a child or vulnerable person; or
- disclosure is otherwise permitted under data protection legislation.

Where a player transfers to another football club, relevant medical, welfare or development information may be shared where appropriate to support continuity of care and development.

Educational or governing organisations may also require access to certain information to fulfil legal or regulatory responsibilities.

7. Storage, Security and Handling of Data

All personal and sensitive information held by Newport County AFC must be stored securely.

Hard copy records must be:

- kept out of public view;
- stored in locked cabinets or secure locations; and
- accessible only to authorised personnel.

Electronic data must be protected using secure systems, passwords and restricted access controls.

Where staff are required to access information away from Club premises, the following standards apply:

- confidential information must not be left unattended in public places;
- unnecessary printed records must be securely shredded;
- documents must not be left on printers or photocopiers;
- computers must be locked or logged out when unattended;
- sensitive data should not be accessed on public devices; and
- any portable storage devices used for Club data must be encrypted and password protected.

Any intentional breach of these requirements may result in disciplinary action.

8. Retention of Data

Newport County AFC will retain personal data only for as long as necessary and in accordance with legal, safeguarding and operational requirements.

Personal information retained by the Club will be:

- relevant and proportionate;
- accurate and up to date; and
- securely stored and protected.

Safeguarding records relating to children or vulnerable adults may be retained indefinitely where appropriate due to the potential significance of historic safeguarding concerns.

Where concerns do not meet the threshold for statutory referral, the Club may still retain records in order to identify patterns or ongoing safeguarding risks over time.

Safeguarding files will:

- be stored separately from general records;
- be securely maintained with restricted access;
- include records of who has accessed the files; and
- be retained in line with safeguarding best practice.

Where there is no safeguarding, legal or regulatory requirement to retain records for longer periods, personal data will generally be retained for up to seven years after an individual leaves the Club.

Records no longer required will be securely destroyed, and an appropriate record of destruction maintained.

Useful Contacts

Club Secretary / Interim Senior Safeguarding Manager

Shaun Bowden

Email: shaun.bowden@newport-county.co.uk

Designated Safeguarding Officer

Morgan Simmons

Email: morgan.simmons@newport-county.co.uk

Academy Manager

Jordan Hughes

Email: jordan.hughes@newport-county.co.uk