



# Futsoul 360 CIC Policy – General Data Protection Regulations (GDPR)

## Version History

Issue	Comment	Approved	Date
1	Original Issue	John Barratt	31 <sup>st</sup> Mar 21

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## INTRODUCTION



### THE PURPOSE AND SCOPE OF THIS POLICY

Futsoul 360 CIC works with a number of young people, particularly in the Early Years Intervention programme. To monitor and report on the progress of the children we work with it is necessary to keep assessment data on their approach and response to the coaching. Maintaining this data and the data we hold on our staff must adhere to the Data Protection Act 2018 (Data Protection Act 2018 - UK’s implementation of the General Data Protection Regulation (GDPR)).

The purpose of this policy statement is to show that all personal data held by Futsoul 360 CIC shall comply with the Data Protection Act 2018 (and therefore GDPR) by ensuring that all personal data shall be:

-  used fairly, lawfully and transparently
-  used for specified, explicit purposes
-  used in a way that is adequate, relevant and limited to only what is necessary
-  accurate and, where necessary, kept up to date
-  kept for no longer than is necessary
-  handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

### Our Policy is that

-  Futsoul 360 CIC will not hold any Sensitive Personal Data.
-  Any personal data held for individuals on the school’s early intervention programme will not have the young persons name recorded against their data – it shall be recorded against a code held by the school, relating to the young person’s name.



- Data held on young people who are part of the community programme will be held for the purpose of running community sessions and community coaching.
- Personal data records held on individuals can be accessed by the individual, appropriate relatives, Avon & Somerset VRU and the school staff for the early intervention programmes. It shall not be shared with other parties.
- The Personal data shall be held as long as the young person is part of the coaching programme and for a year following completion. After this period the data will either be handed to the school or removed from Futsoul 360 CIC records system.
- The early years intervention programme data will be used to demonstrate progress successful completion of the programme and report on individual and collective improvements. The identity of the young people will not be available through this reporting process.
- Coaching performance data will be sent to stakeholders and funders but will not identify young people by name.
- The data will be held on a shared drive area that is only accessible by Futsoul 360 CIC. Access to this data for other people outside Futsoul 360 CIC will be approved or declined by the Data Protection officer.
- Any new requirements to collect data will have a data protection impact assessment (DPIA) completed as appropriate.

This policy applies to anyone working on behalf of Futsoul 360 CIC including board members paid staff and volunteers.

### Individual Rights under this Policy

Under the Data Protection Act 2018, individuals on whom Futsoul 360 CIC holds data have the right to find out about that information. These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

Any requests that are presented under individual rights of this policy shall be dealt with by the Data Protection office in 10 working days,

### SUPPORTING DOCUMENTS

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents.

### Futsoul 360 CIC Data Protection Officer

Sam Andrews: ✉ [futsal360@futsoul.info](mailto:futsal360@futsoul.info)



This policy was last reviewed on: 31<sup>st</sup> Mar 2021

Signed: *John Barratt*

Date 31<sup>st</sup> March 2021

We are committed to reviewing our policy and good practice annually.