



**Chineham RFC  
Basingstoke Sports and Social Club  
Fairfields Road  
Basingstoke  
RG21 3DR**

### **Chineham RFC GDPR & Data Protection Policy**

#### **1. Purpose of This Policy**

Chineham RFC is committed to protecting the privacy and personal data of its members, players, volunteers, coaches, officials, supporters, and other individuals with whom it engages. This policy explains how we collect, use, store, and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

#### **2. Scope**

This policy applies to:

- Club members and players (including junior players)
- Volunteers, coaches, referees, and officials
- Parents/guardians of junior members
- Employees (if applicable)
- Suppliers and third parties

It covers all personal data processed by Chineham RFC in both electronic and paper formats.

#### **3. Data Controller**

Chineham RFC is the **Data Controller** for the personal data it processes and operates in line with:

- Rugby Football Union (RFU) GDPR guidance
- RFU Safeguarding Policy and Procedures
- RFU Regulation 21 (Safeguarding Children)

#### **Key Roles:**

- **Club Secretary:** Responsible for overall data governance
- **Club Safeguarding Officer (CSO):** Responsible for safeguarding-related data, including juniors and vulnerable adults

#### **Contact for Data Protection & Safeguarding Matters:**

Email: [info@chinehamrfc.com](mailto:info@chinehamrfc.com)

#### 4. Personal Data We Collect

In line with RFU requirements, Chineham RFC may collect and process the following personal data:

- **Identity data:** Name, date of birth, gender
- **Contact data:** Address, email address, telephone number
- **Membership data:** RFU GMS ID, membership status, age-grade section, playing position
- **Safeguarding data:** Parental/guardian details, consent forms, next of kin, DBS status (where applicable)
- **Medical & welfare data:** Relevant medical conditions, injuries, allergies, emergency care information (processed with explicit consent and only where necessary)
- **Disciplinary data:** Conduct, grievance, or safeguarding-related records (processed under legal obligation and substantial public interest)
- **Images and media:** Photographs and videos taken at club activities, matches, and events

#### 5. Lawful Basis for Processing

Chineham RFC processes personal data under the lawful bases defined by UK GDPR and RFU guidance:

- **Consent** – for medical data, photography, and marketing communications
- **Contract** – to administer RFU registration, membership, fixtures, and competitions
- **Legal obligation** – compliance with RFU regulations, safeguarding legislation, and financial law
- **Legitimate interests** – effective running of the club, provided individual rights are not overridden
- **Substantial public interest** – safeguarding children and vulnerable adults

#### 6. How We Use Personal Data

Personal data is used to:

- Manage club membership and registrations
- Organise training sessions, matches, and events
- Communicate important club information
- Meet RFU and safeguarding requirements
- Ensure player welfare and safety
- Manage payments and subscriptions
- Promote the club through newsletters, websites, and social media (with consent where required)

#### 7. Data Sharing

In accordance with RFU regulations, personal data may be shared securely with:

- The **Rugby Football Union (RFU)** via the Game Management System (GMS)
- Constituent Bodies, leagues, and match officials
- Club Safeguarding Officers, coaches, and team managers (strictly on a need-to-know basis)
- Statutory bodies such as the police, local authorities, or the RFU Safeguarding Team where required

All data sharing is limited to what is necessary and appropriate. Chineham RFC will **never sell personal data**

#### 8. Data Retention

Data retention follows RFU guidance and statutory requirements:

- **Adult membership records:** Membership duration plus 6 years

- **Junior records:** Until the individual reaches age 21, or longer if safeguarding concerns exist
- **Safeguarding and welfare records:** In line with RFU Safeguarding retention schedules
- **DBS records:** No copies retained; status only recorded
- **Financial records:** 6 years (HMRC requirement)
- **Marketing consents:** Until withdrawn

Data is securely deleted or destroyed once retention periods expire.

## 9. Data Security

Chineham RFC takes appropriate measures to protect personal data, including:

- Password-protected systems and devices
- Restricted access to sensitive data
- Secure storage of paper records
- Regular reviews of data handling practices

## 10. Individual Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion of data (where applicable)
- Restrict or object to processing
- Data portability
- Withdraw consent at any time
- Lodge a complaint with the Information Commissioner's Office (ICO)

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

## 11. Photography & Media (RFU Safeguarding Aligned)

Chineham RFC follows RFU safeguarding guidance when using images:

- Parental consent is required for photographing or filming junior players
- Images will be appropriate, respectful, and never exploitative
- Names of junior players will not be published alongside images
- Consent may be withdrawn at any time by contacting the Club Safeguarding Officer

## 12. Data Breaches & Safeguarding Incidents

Any suspected data breach or safeguarding-related data incident must be reported immediately to the Club Secretary and Club Safeguarding Officer.

- Serious data breaches will be reported to the **Information Commissioner's Office (ICO)** within 72 hours where required
- Safeguarding incidents will be reported in line with **RFU Safeguarding Procedures**
- All incidents will be recorded and reviewed to prevent recurrence

### **13. Policy Review**

This policy will be reviewed annually or following any significant changes in legislation or club operations.

**Approved by:** Chineham RFC Committee

**Date:**