

Westmeath Minotaurs AFC Data Protection Policy

Adopted by the Committee of Westmeath Minotaurs AFC

1. Purpose of This Policy

Westmeath Minotaurs AFC is committed to protecting the personal data of all members, volunteers, coaches, parents/guardians, referees, and young people involved in the club. We comply fully with the General Data Protection Regulation (GDPR), the Data Protection Act 2018, and Sport Ireland's safeguarding and data-handling requirements.

This policy outlines:

- How the club collects, processes, stores, shares, and deletes personal data
- The rights of data subjects
- The responsibilities of club officers and volunteers
- How data is protected in digital, safeguarding, and sporting contexts

We are committed not only to the **letter** of the law but also the **spirit** of the law, ensuring privacy, trust, and respect for all individuals.

2. Definitions

Personal Data: Any information relating to an identified or identifiable natural person.

Special Category Data: Sensitive data including medical information, safeguarding records, disability information, and data relating to children.

Data Subject: Any individual whose personal data is processed by the club.

Data Controller: Westmeath Minotaurs AFC.

Contact Person: The Club Secretary (westmeathminotaurs@gmail.com).

3. GDPR Principles

Westmeath Minotaurs AFC follows all GDPR principles.

We ensure all personal data is:

1. **Lawfully processed**
2. **Collected for specific purposes**
3. **Adequate and limited**
4. **Accurate and up-to-date**
5. **Stored only as long as necessary**
6. **Securely protected**

4. What Data We Collect

Westmeath Minotaurs AFC collects only the data necessary for safe club operation:

Membership Data

- Name
- Date of birth
- Contact details
- Parent/guardian details (for under-18s)

Medical & Emergency Data

- Relevant medical conditions
- Emergency contact information
- Concussion history (if applicable)

Safeguarding Data

- Incident reports
- Concerns raised
- Communications with Tusla or Gardai
- These are stored separately and securely.

Performance & Participation Data

- Attendance
- Team selection
- Match statistics (non-sensitive)

Digital & Communication Data

- WhatsApp group membership
- Email lists
- Photo/video consent forms

Administrative Data

- Payments
- Registration forms
- Insurance information

5. Youth Data & Parental Consent

Children's data receives **enhanced protection** under GDPR.

For all under-18s:

- Parental/guardian consent is required for data collection.
- Medical information is stored securely and accessed only by authorised coaches.

- Safeguarding records are restricted to the DLP, Deputy DLP, and Children's Officer.
- Photos/videos are only taken or shared with explicit parental consent.
- Children's data is never shared on social media without consent.

6. Digital Communication & Messaging Apps

To protect personal data in digital environments:

WhatsApp / Messaging Groups

- Only coaches and committee members may administer groups.
- Parents must be included in all youth team groups.
- No private messaging between adults and children.
- Groups are deleted at the end of each season.

Email

- Group emails use BCC where appropriate.
- Email lists are stored securely.

Social Media

- No posting of children's images without consent.
- No tagging children.
- No identifying information.

7. Photography & Video

The club uses images responsibly:

- Written consent required for all minors.
- No photos in changing rooms.
- No live-streaming without safeguards.
- Images stored securely and deleted when no longer needed.
- Parents may withdraw consent at any time.

8. Data Retention

Westmeath Minotaurs AFC retains data only as long as necessary:

Retention Schedule

- Membership data: 3 years after leaving the club
- Medical forms: 1 year after season end
- Safeguarding records: 7 years (Sport Ireland standard)
- Injury reports: 7 years

- Photo consent forms: Until consent withdrawn or child leaves club
- WhatsApp groups: Deleted annually
- Emails: Deleted after 12 months unless needed for club administration

9. Third-Party Data Sharing

We share data only when necessary:

Shared With:

- American Football Ireland (registration, insurance)
- Sport Ireland (safeguarding compliance)
- Garda Vetting Bureau
- Tusla (child protection concerns)
- Insurers (injury claims)
- Medical professionals (in emergencies)

We never sell or share data for commercial purposes.

10. Volunteer Access Rules

Only authorised volunteers may access personal data:

- Access is granted by the Club Secretary.
- Access is revoked when a volunteer leaves their role.
- Volunteers must sign a confidentiality agreement.
- Safeguarding data is restricted to DLP, Deputy DLP, and Children's Officer.

11. Data Subject Rights

Members may request:

- Access
- Rectification
- Erasure
- Restriction
- Objection
- Portability

Requests are handled by the Club Secretary within one month.

12. Data Security

Security Measures

- Password-protected files

- No storing data on personal devices without approval
- Encrypted storage for safeguarding records
- Regular password changes
- No password sharing
- Secure disposal of digital and paper records

13. Data Breach Management

- Breaches involving children are prioritised.
- The DLP is notified immediately if safeguarding data is involved.
- WhatsApp or social media breaches are treated as data breaches.

14. Data Protection Impact Assessments (DPIAs)

DPIAs are conducted when:

- Processing children's data
- Introducing new digital platforms
- Storing large volumes of images
- Handling medical or safeguarding data

15. Alignment with Safeguarding Policy

Safeguarding data is treated as **special category data**:

- Stored separately
- Access restricted
- Shared only with statutory authorities
- Retained for 7 years
- Logged securely

16. Accountability

The Club Secretary oversees:

- GDPR compliance
- Record-keeping
- Volunteer access
- Breach reporting
- DPIAs
- Retention schedules

Committee members support compliance across all club operations.

17. Policy Review

This policy is reviewed annually by the Committee of Westmeath Minotaurs AFC.

Signed: _____ (Chairperson)

Date: _____