POLICY

Kingswood Sports CIO Data Protection Policy

Policy Number	KS-DP-01
Effective Date	September 2026
Review Date	September 2027
Approved by	Board of Trustees
Version	1.0

1. Purpose

This policy ensures that Kingswood Sports CIO complies with data protection laws and best practices, safeguarding the personal data of employees, volunteers, beneficiaries, donors, and other stakeholders.

2. Scope

This policy applies to all trustees, employees, volunteers, contractors, and other parties accessing or handling personal data on behalf of Kingswood Sports CIO.

3. Definitions

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

Processing: Any operation or set of operations performed on personal data, whether or not by automated means, including collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.

Data Subject: The individual whose personal data is being processed.

Data Controller: The organisation that determines the purposes and means of processing personal data.

Data Processor: The organisation that processes personal data on behalf of the data controller.

GDPR: General Data Protection Regulation, a regulation in EU law on data protection and privacy.

4. Policy Statement

- Kingswood Sports CIO is committed to protecting the privacy and security of personal data.
- The Charity will process personal data lawfully, fairly, and transparently.

- Personal data will be collected and processed only for specified, explicit, and legitimate purposes.
- The Charity will ensure that personal data is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- Personal data will be accurate and, where necessary, updated.
- Personal data will be kept in a form that permits the identification of data subjects for no longer than is necessary.
- Personal data will be processed in a manner that ensures appropriate security.

5. Responsibilities

Board of Trustees:

- Ensure the implementation and review of this policy.
- Provide leadership and support for data protection initiatives.
- Ensure compliance with data protection legislation.

Data Protection Officer (DPO):

- Oversee data protection compliance and implementation of this policy.
- Conduct regular audits to ensure compliance with data protection laws.
- Provide training and support on data protection to staff and volunteers.
- Serve as the contact point for data subjects and the Information Commissioner's Office (ICO).

Employees and Volunteers:

- Follow data protection policies and procedures.
- Report any data breaches or concerns to the DPO immediately.
- Participate in data protection training as required.

6. Data Protection Principles

Lawfulness, Fairness, and Transparency:

- Personal data will be processed lawfully, fairly, and transparently.

Purpose Limitation:

- Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in an incompatible manner.

Data Minimization:

- Personal data will be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

Accuracy:

- Personal data will be accurate and, where necessary, updated.

Storage Limitation:

- Personal data will be kept in a form that permits the identification of data subjects for no longer than is necessary.

Integrity and Confidentiality:

- Personal data will be processed to ensure appropriate security, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage.

7. Data Subject Rights

Right to Access:

- Data subjects have the right to access their data and obtain information about how it is being processed.

Right to Rectification:

- Data subjects have the right to request the correction of inaccurate personal data.

Right to Erasure:

- Data subjects have the right to request the deletion of their data in certain circumstances.

Right to Restrict Processing:

- Data subjects have the right to request the restriction of processing their data in certain circumstances.

Right to Data Portability:

- Data subjects have the right to receive their data in a structured, commonly used, and machine-readable format and to transmit it to another controller.

Right to Object:

- Data subjects have the right to object to processing their data in certain circumstances.

Rights Related to Automated Decision-Making:

- Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

8. Data Security

Technical and Organizational Measures:

- Implement appropriate technical and organisational measures to ensure security appropriate to the risk.
- Regularly review and update security measures to protect against unauthorised access, data breaches, and other threats.

Data Breach Procedures:

- Establish procedures for identifying, reporting, and managing data breaches.
- Notify the ICO and affected data subjects promptly during a data breach.

9. Data Processing Agreements

- Ensure that any third parties processing personal data on behalf of the Charity enter into a written data processing agreement that includes GDPR-compliant terms.

10. Training and Awareness

- Train employees and volunteers regularly on data protection principles, policies, and procedures.
- Raise awareness about the importance of data protection and the role of individuals in safeguarding personal data.

11. Monitoring and Review

- The DPO will monitor compliance with this policy and report to the Board of Trustees.
- This policy will be reviewed annually to ensure its effectiveness and relevance.
- The review process will consider feedback from employees, volunteers, and data subjects.

12. Contact Information

For any queries or concerns regarding this policy, please contact:

Data Protection Officer:
Paul Richardson
Paul.Richardson@Kingswoodsports.co.uk

Chair of the Board of Trustees:
Mike Corlyon
Mike.Corlyon@kingswoodsports.co.uk

Approved by:
Mike Corlyon
Chair of the Board of Trustees
Kingswood Sports CIO

This policy ensures that Kingswood Sports CIO processes personal data lawfully, fairly, and transparently, safeguarding the rights and privacy of all stakeholders.