

Burnley FC in the Community – GDPR Policy

Scope

The Charity's GDPR Policy applies to all its employees and to everyone working at its premises, including any contractors.

Introduction

This is the GDPR Policy of Clarets in the Community Limited and its trading subsidiary (BFCitC Facilities (Enterprises) Ltd). Clarets in the Community Limited controls its trading subsidiary by way of having the power to govern its financial and operating policies so to obtain benefits from its activities.

As such, while the trading subsidiary has its own board of directors, the Trustees of Clarets in the Community Limited have control over the Group.

There is an intercompany agreement between Clarets in the Community Limited and its trading subsidiary that explains how data may be shared between the two companies in compliance with the GDPR.

Throughout this Policy, any references to the 'Group', to the 'Organisation', or to 'we', 'us' and 'our' refers to both Clarets in the Community Limited and BFCitC Facilities (Enterprises) Ltd.

GDPR and Risk Management

Compliance with the GDPR, including the existence, review and adherence to this Policy forms a key set of controls of the Group with regards to risk management. The Group has defined, in its risk strategy, a key control to be: *any control which is in place to mitigate more than one identified risk contained in the Principal Risk Inventory.*

Our compliance with the GDPR mitigates the following risks listed in the Group's Principal Risk Inventory which is available on request:

<u>Risk ID</u>	<u>Potential Risk from Principal Risk Inventory</u>
OPS010	Risk of Inadequate Information Technology
PEO003	Risk of Employment Issues
FAC002	Risk of Inadequate Security of Facilities
DAT001	Risk of Inadequate Management of Data and Inadequate Security of Data
DAT002	Risk of Compromise of Intellectual Property
COM001	Risk of Failure to Comply with Legislation or Regulation

GDPR Policy

The EU's General Data Protection Regulation (GDPR) lays down certain rules in relation to the way personal data is collected, stored and disposed. The six (6) Principles of the Act are intended to protect the rights of individuals about whom we record personal data.

We are committed to upholding the GDPR Principles in the interests of protecting personal data from being collected or processed inappropriately. Strict confidentiality and security is required from everyone involved in processing personal data, or those who have any access to any file which contains personal data.

The Principles of the Regulation

The GDPR requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Access to Personal Data

Individuals personal data held on file or on computer may be available at the request of the employee.

The request of personal data should be made in writing and addressed to your team leader. Should this request be granted, the Charity will provide this information within 40 days of the request being made.

In certain circumstances a fee may be levied for the provision of the information being requested.

Terms Used Under the GDPR

DATA CONTROLLER - this is the person who either jointly or alone determines the purposes for which personal data can be processed. This term comprises not only individuals but also companies and other corporate and unincorporated bodies of persons.

DATA USER - is any person who has access to any manual or computerised file that contains personal data. Every Data User has a responsibility to comply with the principles of the GDPR and failure to do so will result in disciplinary action and possibly summary dismissal.

Equality and Diversity

The Organisation is committed to the principles of equality and strives to ensure that everyone who wishes to be involved in our Organisation whether as staff, trustees, volunteers, participants or as a general member of the public:

- has a genuine and equal opportunity to do so without regard to their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion and belief, sex and sexual orientation; and
- can be assured of an environment in which their rights, dignity and individual worth are respected without the threat of intimidation, victimisation, harassment, bullying or abuse.

The Organisation has an Equality and Diversity Policy which is monitored and review annually as a minimum.

The GDPR Policy does not and must not contradict the contents of the Equality and Diversity Policy.

Next Review of Policy

The Policy must next be reviewed and signed off the sooner of May 2019, or when there have been material changes to the relevant courses of business.