



## Great Britain Deaf Football (GBDF)

# Data Protection Policy

Last updated: March 2026

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Next review due: March 2027

## 1. Policy statement

1.1. GB Deaf Football (GBDF) collects and processes personal data in order to deliver its activities, meet legal obligations and operate effectively as a national governing body.

1.2. We are committed to handling personal information lawfully, fairly and transparently in accordance with:

- The UK General Data Protection Regulation (UK GDPR);
- The Data Protection Act 2018;
- The Data Protection, Privacy and Electronic Communications (Amendments etc.) Regulations 2019.

1.3. We recognise that appropriate data handling is essential to maintaining trust with players, staff, volunteers, partners and stakeholders.

1.4. This policy explains how GBDF manages personal data and applies to all trustees, employees, volunteers, contractors and anyone acting on behalf of GBDF.

## 2. Scope

2.1. This policy applies to personal data relating to:

- Players and squad members;
- Coaches and team staff;
- Trustees and committee members;
- Employees and volunteers;
- Match officials;
- Members and participants;
- Suppliers, partners and funders;
- Any individual whose data GBDF processes.

2.2. It applies to data held electronically, in email, in cloud systems or in paper form.



### 3. Data Protection principles

3.1. GBDF adheres to the seven principles of UK GDPR. Personal data will be:

- (a) **Lawful, fair and transparent** – We are clear about why data is collected and how it is used.
- (b) **Collected for specified purposes** – We only use data for legitimate organisational purposes.
- (c) **Adequate and relevant** – We collect only what is necessary.
- (d) **Accurate and kept up to date** – We correct inaccuracies promptly.
- (e) **Kept only as long as necessary** – In line with our retention arrangements.
- (f) **Secure** – Protected through appropriate technical and organisational measures.
- (g) **Accountable** – We can demonstrate compliance.

### 4. Lawful basis for processing

4.1. GBDF processes personal data under one or more of the following lawful bases:

- Consent;
- Contractual necessity;
- Legal obligation;
- Legitimate interests;
- Protection of vital interests.

4.2. Where consent is relied upon, individuals may withdraw consent at any time.

### 5. Special category data

5.1. GBDF may process special category (sensitive) personal data where necessary, including:

- Audiology assessments and hearing test results for eligibility purposes;
- Medical information, including injury and fitness to participate;
- Neurodiversity information where voluntarily disclosed and relevant to participation, welfare or reasonable adjustments;
- Equality monitoring information;
- Safeguarding records;
- Criminal records and DBS information (where applicable).

5.2. Such data will only be processed where there is a lawful basis under UK GDPR and where additional safeguards are in place. GBDF will only collect and retain special category data that is necessary for its legitimate sporting, welfare or legal responsibilities.

### 6. Individual rights

6.1. Individuals have the right to:

- Be informed about how their data is used;
- Access their personal data;
- Rectify inaccurate data;
- Request erasure (where applicable);
- Restrict or object to processing;



- Data portability (where applicable).

6.2. Subject access requests must be made in writing to the GBDF Board.

6.3. GBDF will respond within one calendar month.

## **7. Data security**

7.1. GBDF takes appropriate measures to protect personal data, including:

- Password-protected systems;
- Restricted access controls;
- Secure cloud storage;
- Encrypted devices where appropriate;
- Secure disposal of paper and electronic records;
- Data processing agreements with third-party providers;

7.2. Personal data must not be shared outside the organisation without appropriate authority or lawful basis.

## **8. Data sharing**

8.1. GBDF may share personal data with:

- Competition organisers;
- International federations;
- Funding bodies;
- Statutory authorities;
- Safeguarding agencies;
- Professional advisers.

8.2. Data will only be shared where necessary, lawful and proportionate.

8.3. Personal data will not be transferred outside the UK without appropriate safeguards.

## **9. Data breaches**

9.1. Any actual or suspected personal data breach must be reported immediately to the Chair or designated Data Lead.

9.2. GBDF will assess all breaches and, where required by law, notify the relevant supervisory authority within the statutory timeframe and inform affected individuals where there is a high risk to their rights and freedoms.

9.3. All breaches will be recorded in an incident log.

9.4. Individuals who are dissatisfied with how GBDF has handled their personal data should raise the matter with GBDF in the first instance.

9.5. They also have the right to lodge a complaint with the Information Commissioner's Office.



## 10. Responsibilities

10.1. The GBDF Board has overall responsibility for data protection compliance.

10.2. All trustees, staff and volunteers must:

- Handle personal data responsibly;
- Follow this policy;
- Report concerns promptly.

10.3. Failure to comply may result in disciplinary action.

## 11. Review of policy

11.1. This policy will be reviewed annually or sooner if legislation or organisational changes require it.

11.2. The review date shall be recorded on the front of this document.

