

HOOPS UNITED BASKETBALL

Data Protection Policy (UK GDPR & Data Protection Act 2018) – aligned for a Basketball England affiliated club

Policy owner	Club Committee (supported by the Club Welfare Officer / Data Protection Lead)
Version	v1.0
Approved by	Club Committee
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Club contact for data protection	info@hoopsunited.co.uk
Basketball England affiliation	Affiliated to Basketball England.

1. Policy statement and purpose

HOOPS UNITED BASKETBALL (the “Club”) is committed to protecting the privacy and personal data of everyone we engage with, including players, parents/carers, coaches, volunteers, officials, members, supporters and partners. We will process personal data fairly, lawfully and transparently in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (together, “data protection law”).

This policy explains what personal data we collect, why we collect it, how we use it, who we share it with (including Basketball England systems where relevant), how long we keep it, how we keep it secure, and how individuals can exercise their data protection rights.

2. Scope and definitions

Scope. This policy applies to all personal data processed by the Club in any format (paper, electronic, photos/video, messaging apps, email and web systems) and covers activities including training, matches, events, tours, competitions, communications, fundraising and administration.

- **Personal data:** information relating to an identified or identifiable individual (e.g., name, contact details, membership number, images).
- **Special category data:** sensitive personal data needing extra protection (e.g., health/injury information). Processing requires an Article 6 lawful basis and an Article 9 condition.
- **Child:** anyone under 18 (for club purposes).
- **Data controller:** the organisation deciding why/how personal data is processed (the Club).
- **Processor:** a third party processing personal data on behalf of the controller (e.g., IT providers).
- **Personal data breach:** a security incident leading to accidental/unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

3. Data protection principles

We follow the seven UK GDPR principles: (1) lawfulness, fairness and transparency; (2) purpose limitation; (3) data minimisation; (4) accuracy; (5) storage limitation; (6) integrity and confidentiality (security); and (7) accountability.

4. Roles and responsibilities

- **Club Committee:** approves this policy; ensures appropriate resources, training and oversight; and reviews compliance and incidents.
- **Data Protection Lead** (may be the Club Welfare Officer or another appointed officer): acts as the first point of contact for data protection queries/requests; maintains records of processing and retention; supports breach management; and liaises with Basketball England where data flows involve Basketball England systems.
- **Coaches, team managers, volunteers and officials:** follow this policy, use approved systems, minimise data held, and report any suspected data breaches immediately.
- **All members/participants:** keep their own data accurate and report concerns.

5. Personal data we collect

Depending on your involvement with the Club, we may collect and use the following categories of personal data:

- **Identity and contact:** name, date of birth, address, email, phone, emergency contacts.
- **Membership and participation:** player/coach/volunteer role, team, competition registrations, attendance and eligibility information (including Basketball England licence/membership number where applicable).
- **Safeguarding and welfare:** incident/concern records, reports and outcomes (shared strictly on a need-to-know basis).
- **Health/injury information** (special category): relevant medical conditions, allergies, injury/return-to-play notes where provided for safety and inclusion.
- **Photos, video and audio:** team photos, match footage, promotional content, livestreams (where used).
- **Payments and finance:** membership fees paid, invoices/receipts and transaction references (we minimise bank/card data and prefer reputable payment providers).
- **Recruitment/volunteering:** references, qualifications, coaching awards, safeguarding training status.
- **DBS:** where required for eligible roles, we may record DBS status/verification information (not full DBS certificate content) in line with Basketball England processes where applicable.

6. Where we get personal data from

- Directly from you (or from a parent/carer for juniors) via registration forms, membership platforms, email or messaging.
- From Basketball England systems and communications where needed to administer affiliation, licensing, competition registration and safeguarding requirements.
- From coaches/team managers (e.g., attendance, team selection, competition entry information).
- From venues/league organisers/officials (e.g., fixtures, discipline reports) where relevant.

7. Why we use personal data (purposes) and lawful bases

We only process personal data where we have a lawful basis under Article 6 UK GDPR (such as performance of a contract, legal obligation, legitimate interests, vital interests, or consent). Where we process special category data (e.g., health information), we also identify a condition under Article 9 UK GDPR and (where required) an additional condition under Schedule 1 of the Data Protection Act 2018.

Purpose	Typical lawful basis (Article 6) / condition (Article 9)
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Administer membership, teams, training sessions, matches, competitions and affiliation requirements	Contract (membership/participation) and/or Legitimate interests (running the Club); sometimes Legal obligation.
Communications about training, fixtures, cancellations, kit, events and volunteering	Contract and/or Legitimate interests (keeping members informed).
Safeguarding and welfare management, including recording and sharing concerns where necessary	Legal obligation and/or Vital interests; may also rely on Legitimate interests. If special category data is involved, use an Article 9 condition as appropriate.
Medical/injury and accessibility support (e.g., allergies, asthma, return-to-play notes)	Vital interests (where necessary for safety) and/or Explicit consent (especially for juniors), plus an Article 9 condition for health data.
Payment administration and accounting	Contract and/or Legal obligation.
Promoting the Club (website, social media, posters) using photos/videos	Legitimate interests and/or Consent (recommended for juniors and for close-up imagery). The Club will always respect objections and withdrawal of consent where applicable.
Marketing communications (e.g., newsletters, fundraising, sponsorship)	Consent where required; otherwise Legitimate interests with clear opt-out.
Recruitment and vetting for eligible roles (including DBS processing where applicable)	Legal obligation and/or Legitimate interests; where special category data is processed, an Article 9 condition and DPA 2018 Schedule 1 condition may apply.

8. Who we share personal data with

We only share personal data when it is necessary, proportionate and lawful. We share the minimum amount of information required, and where possible we use trusted providers with appropriate contractual safeguards.

- **Basketball England:** for affiliation, licensing/membership, competition administration, discipline and safeguarding requirements where applicable.
- **Leagues, competition organisers and officials:** for fixtures, eligibility, discipline and event administration.
- **Venues and facility providers:** where required for bookings, access and safety.
- **IT and communications providers:** email, file storage, membership platforms and collaboration tools.
- **Payment providers:** to process card payments/online payments (we do not store full card details).
- **Insurers:** in relation to claims and incident management.
- **Professional advisers:** e.g., accountants, legal advisers (where necessary).
- **Statutory agencies:** police, local authority safeguarding teams, NHS and emergency services where necessary for safeguarding or safety.

9. International transfers

We aim to store personal data in the UK. Where a supplier processes data outside the UK, we will ensure appropriate safeguards are in place (for example, an adequacy decision or approved contractual protections) before transferring personal data.

10. Retention and disposal

We keep personal data only for as long as necessary for the purposes we collected it for, including satisfying legal, accounting, insurance and safeguarding requirements, and then we securely delete or destroy it.

Record type	Typical retention period (guidance – tailor to Club needs)
Membership and participation records	For the duration of membership plus up to 2 years for queries/administration.
Finance records (fees, invoices, accounts)	For the duration of membership plus up to 1 year for queries/administration.
Accident/incident reports	1 year, taking account of insurance and limitation periods.
Safeguarding concern records	Retain securely in line with safeguarding guidance and only as long as necessary; access restricted to authorised roles.
Marketing consents	Until withdrawn or no longer needed.
Photos/videos used for promotion	Until withdrawn (where consent applies) or until no longer needed; review annually.

11. Data security

We implement appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access, disclosure, alteration and destruction.

- Access to personal data is restricted to authorised roles and provided on a need-to-know basis.
- We use strong passwords and multi-factor authentication where available.
- Club data should be stored in approved systems (not on personal devices where avoidable); where devices are used, they must be protected by passcodes and kept up to date.
- We minimise the use of group messaging and avoid sharing sensitive personal data in open groups.
- Paper records are kept secure (locked away when not in use) and disposed of using secure shredding.
- We review who has access to key systems regularly, especially when volunteers/staff change roles.
- We ensure relevant third parties have appropriate security measures and contracts in place.

12. Children and young people

The Club works with children and young people and takes extra care to protect their personal data. For junior players, we generally collect information from a parent/carer and use parent/carer contact details for essential communications unless arrangements are agreed and appropriate.

Where online services are used, we will seek parent/guardian involvement as appropriate. Basketball England notes that individuals under 13 should obtain parent/guardian permission before providing personal information.

13. Photography, video, social media and live streaming

We may use photographs and video to support coaching, match review, promotion of the Club and celebration of achievements. We will do this responsibly and in line with safeguarding expectations.

- We will inform members/parents when photography/video is likely to take place and provide a route to raise concerns or object.
- For junior players, we recommend obtaining parent/carer consent for close-up or individually identifiable promotional images, and we will respect any refusal/withdrawal.
- We avoid publishing personal contact details alongside images.
- Coaches/volunteers should not store club photos/videos long-term on personal devices; content should be transferred to approved storage and deleted from devices when no longer needed.
- Live streaming (if used) will be risk assessed and follow any Basketball England templates/guidance where adopted by the Club.

14. Individual rights, requests and complaints

Data protection law gives individuals rights over their personal data, including the right to be informed, access, rectification, erasure, restriction, data portability, and the right to object in certain circumstances.

To exercise your rights, please contact the Club's data protection contact listed in the Document Control table. We may need to confirm your identity before responding. If you are unhappy with our response, you can raise a concern with the UK Information Commissioner's Office (ICO).

15. Personal data breaches

Any suspected personal data breach (e.g., lost device, mis-sent email/message, unauthorised access) must be reported immediately to the Data Protection Lead. We will assess the risks, take steps to contain the breach, keep appropriate records, and notify relevant parties where legally required.

16. Training, awareness and compliance

- All coaches, committee members and volunteers must understand this policy and complete any required training relevant to their role (including safeguarding training where applicable).
- The Club will maintain basic records of processing activities and review data held periodically to ensure it remains accurate and necessary.
- We will review supplier arrangements and access permissions regularly.

17. Review and related documents

This policy will be reviewed at least annually, and sooner if there are significant changes to Club activities, Basketball England requirements, or data protection law/guidance.

- HOOPS UNITED BASKETBALL Safeguarding Policy (Children and Young People, and Adults at Risk)
- Codes of Conduct (players, parents/carers, coaches and volunteers)
- Photography/Video/Live Streaming Guidance (Club-specific)
- Social Media Policy
- Complaints Policy