

FAQS

These FAQs are intended to assist schools whose pupils are participating in activities run by professional football club community organisations (CCOs) funded by the Premier League Charitable Fund (PLCF). They cover the way in which data protection legislation regulates the activities run by the CCOs and what information schools can lawfully provide to the CCOs under the UK GDPR. The PLCF and CCOs collaborate closely on the projects we are running at your school, but **Foundation of Light** is your main contact for any questions you have related to data protection.

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1. What details about your pupils do CCOs require and why?

1.1 In order to deliver our activities, we need to obtain two types of information from you relating to the children who are participating. The first type of information is administrative information. Broadly speaking, this information enables us to run our activities. This information includes:

- Name;
- Address of school;
- Date of birth/Year Group;
- Gender;
- Information about any medical conditions and/or disabilities which are relevant to the activities the child undertakes;
- Anything else that would be useful to know about an individual child when working with them, e.g. challenging behaviour issues;
- Data relating to criminal convictions and offences;
- **[To insert any other details which we need for administrative purposes].**

1.2 These details all constitute personal data under the UK GDPR, while details relating to medical conditions and disabilities constitute special category personal data. We use the term sensitive personal data to collectively refer to special category personal data and personal data about criminal convictions and offences.

1.3 The other type of data we need to collect is diversity information. This information helps us to understand the impact of our activities on their participants and to ensure that our activities are offered to children and young people across our community. This information includes:

- Year group;
- Gender;
- Ethnicity;
- Health;
- Religious beliefs;
- Sexual orientation (for children aged 16 and over).

1.4 We need administrative information for the following purposes:

- to help us deliver the activities (for example, making attendance lists and ensuring that the children are placed in appropriate groups);
- to track the progress of the children during their time with us;
- to contact the children about the activities (for example, postponements due to bad weather or changes of venue);
- in the case of information about medical conditions, to ensure that we can take appropriate care and take necessary precautions;
- to respond to appropriate queries from parents;
- [to provide reports to schools if required].

1.5 We need diversity information so that the PLCF can analyse the impact and reach of the activities. The PLCF will use this information for statistical purposes: they will not access or use this information to take decisions about individuals. This information is only used to demonstrate how our activities are impacting schools and communities. Not having access to this statistical data would mean that an appropriate evaluation of our work could not be carried out, which could lead to a reduction in or loss of funding for our work.

1.6 In order to demonstrate the impact of our projects, we will prepare case studies and testimonials from specific participants. We will always obtain the consent of those participants to process their data for this purpose.

2. Does the UK GDPR allow you to provide a CCO with administrative and diversity information without the consent of our pupils and/or their parents?

2.1 Yes: the UK GDPR and the Data Protection Act 2018 provide several legal bases for controllers (such as schools) to provide information without needing to obtain the consent of the child or their parents. These include:

(a) Public task: the sharing is a proportionate (that is, justifiable and not overly intrusive) way for you to perform your tasks as an educational institution. PLCF and the CCOs have carried out a careful assessment by means of a Data Protection Impact Assessment (“DPIA”) of whether sharing administrative and diversity information is proportionate. In their view this legal basis can be met by schools because the processing of the data is a proportionate way of delivering activities to children which will support their health and wellbeing and evidencing positive impact on children and the communities they come from.

(b) Monitoring equality of opportunity: for more sensitive data such as data relating to health, religious beliefs, or race or ethnic origin, it is permissible to collect this data for the monitoring of equal opportunity or treatment.

(c) Safeguarding: in relation to sensitive data such as data relating to criminal convictions and offences, it is permissible to process this data for the purposes of safeguarding.

2.2 You may be required to obtain consent to the processing of personal data in certain limited circumstances. For example:

(a) when you have made an express statement to the child or their parents, in a privacy notice or other similar document, that you will not share their personal details with us, or will only do so with consent;

(b) when you originally collected the data you did so for purposes that are completely incompatible with giving the data to us.