

# Data Protection Policy

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## 1.1 Definitions

<b>Charity</b>	Means Dallaglio RugbyWorks, a registered charity.
<b>GDPR</b>	Means the General Data Protection Regulation.
<b>Responsible Person</b>	Means Rachel Adams (Development Manager).
<b>Register of Systems</b>	Means a register of all systems or contexts in which personal data is processed by the Charity.

## 1.2 Data Protection Principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of 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.”

## 1.3 General Provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner’s Office as an organisation that processes personal data.

## 1.4 Roles and Responsibilities

- a. Board of Trustees – The Board of Trustees has overall responsibility for ensuring that the Charity complies with the relevant data protection obligations.
- b. The responsible person is in charge of overseeing the implementation of this policy, monitoring compliance with data protection law, and developing related policies and guidelines where applicable. The responsible person will report any breaches to the policy to the Board of Trustees, the CEO and the COO.
- c. The responsible person is: Rachel Adams, Development Manager
  - i. Mobile: 07597679612
  - ii. Email: rachel@dallaglorugbyworks.com
  - iii. Address: Dallaglio RugbyWorks, Level 4, House of Sport, 190 Great Dover Street, London, SE1 4YB
- d. All employees are responsible for:
  - i. Collecting, storing and processing any personal data in accordance with this policy and any extended privacy notices.
  - ii. Ensuring the accuracy of the personal data they collect, store and process including notifying the Charity of a change to their personal data (e.g. address).
  - iii. Contacting the Responsible Person in the following circumstances:
    - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure.
    - If they have any concerns that this policy is not being followed.
    - If they are unsure whether or not they have a lawful basis to use personal data in a particular way.
    - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area.
    - If there has been a data breach.
    - Whenever they are engaging in a new activity that may affect the privacy rights of individuals.
    - If they need help with any contracts or sharing personal data with third parties.

## 1.5 Lawful Purposes

- a. All data processed by the Charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

## 1.6 Data We Hold, Why and Where

- a. Dallaglio RugbyWorks stores and processes data for the following user groups;
- I. Employees
  - II. Service users
  - III. Trustees
  - IV. Individual sponsors
  - V. Institutions
  - VI. Volunteers
  - VII. Suppliers & partners
- b. Data we hold - It is Dallaglio RugbyWorks policy that no staff can store/save any data on their PC/laptop/tablet/phones. All data must be saved to the authorised storage sites. A breach of this may be considered gross misconduct.

Employees	
<b>What we store</b>	<ol style="list-style-type: none"> <li>1. Name</li> <li>2. Contact details (phone/email/address)</li> <li>3. Bank details</li> <li>4. ID</li> <li>5. DBS</li> <li>6. References</li> <li>7. Emergency contact details</li> <li>8. DOB</li> <li>9. NI number</li> <li>10. Salary information</li> <li>11. Length of service</li> <li>12. Equality monitoring data</li> <li>13. Medical conditions</li> <li>14. Media</li> <li>15. CV</li> <li>16. Job applications</li> <li>17. Photos</li> <li>18. Right to work</li> </ol>
<b>Why</b>	<ol style="list-style-type: none"> <li>1. Due diligence</li> <li>2. Health &amp; safety</li> <li>3. Record keeping</li> <li>4. Legal requirements</li> <li>5. Child protection</li> <li>6. HMRC</li> </ol>
<b>Where it is stored</b>	<ol style="list-style-type: none"> <li>1. Microsoft Office 365</li> <li>2. Breathe HR</li> <li>3. Brightpay (payroll system)</li> <li>4. Microsoft Exchange Online</li> <li>5. Website</li> <li>6. Microsoft Teams</li> <li>7. QuickBooks</li> </ol>

	8. Donorfy
<b>Who has access</b>	Only authorised personnel have access including; HR lead, finance lead, audit company for purpose of annual audit. Information shared only where necessary.

Service Users	
<b>What we store</b>	<ol style="list-style-type: none"> <li>1. Name</li> <li>2. Contact details (phone/email/address)</li> <li>3. DOB</li> <li>4. Address</li> <li>5. Ethnicity</li> <li>6. Gender</li> <li>7. Disability</li> <li>8. Educational Healthcare Plans</li> <li>9. Information on personal circumstance</li> <li>10. Parent/guardian information</li> <li>11. Safeguarding notes</li> <li>12. Personal circumstance</li> <li>13. School</li> <li>14. Medical conditions</li> <li>15. Case studies</li> <li>16. Admissions</li> <li>17. Attainment</li> <li>18. Attendance</li> <li>19. Behaviour</li> <li>20. Exclusions</li> <li>21. Personal identifiers, contacts and pupil characteristics</li> <li>22. Identity management and authentication</li> <li>23. Survey responses based on their thoughts, feelings, physical and mental wellbeing</li> <li>24. Catering and free school meal management</li> <li>25. Trips and activities</li> <li>26. Medical information and administration</li> <li>27. Safeguarding and special educational needs</li> <li>28. Photos</li> <li>29. Education/Employment/Training destinations</li> </ol>
<b>Why</b>	<ol style="list-style-type: none"> <li>1. Track impact</li> <li>2. Child protection</li> <li>3. Health and safety</li> <li>4. Planning and delivery of our interventions</li> </ol>
<b>Where it is stored</b>	<ol style="list-style-type: none"> <li>1. Microsoft Exchange Online</li> <li>2. Sharepoint</li> <li>3. UpShot</li> <li>4. MyConcern</li> <li>5. Paper based forms</li> <li>6. Player Profiles</li> </ol>

<b>Who has access</b>	Full team (multiple levels of access as required per role)
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Trustees	
<b>What we store</b>	<ol style="list-style-type: none"> <li>1. Name</li> <li>2. Contact details (phone/email/address)</li> <li>3. DOB</li> <li>4. ID documents</li> <li>5. Photos</li> <li>6. Bio information</li> <li>7. DBS Information</li> <li>8. Charity Commission compliance information</li> </ol>
<b>Why</b>	<ol style="list-style-type: none"> <li>1. Governance</li> <li>2. Communication</li> <li>3. Child protection</li> <li>4. Compliance with the Charity Commission</li> </ol>
<b>Where it is stored</b>	<ol style="list-style-type: none"> <li>1. Microsoft Exchange Online</li> <li>2. SharePoint</li> <li>3. Website</li> <li>4. Charity Commission site</li> </ol>
<b>Who has access</b>	Email – full team Other data – only authorised personnel Some data about appointment and names on Charity Commission website

Individual Supporters (corporate funders, donors, followers, event attendees)	
<b>What we store</b>	<ol style="list-style-type: none"> <li>1. Name</li> <li>2. Email</li> <li>3. Phone</li> <li>4. Address</li> <li>5. Photos</li> <li>6. Bank details</li> <li>7. Events attended</li> <li>8. Donation record</li> <li>9. Workplace</li> </ol> <p>For Cycle Slam event attendees, we also store:</p> <ol style="list-style-type: none"> <li>1. Medical Records</li> <li>2. Passport information</li> <li>3. Emergency Contact details</li> <li>4. DOB</li> </ol>
<b>Why</b>	<ol style="list-style-type: none"> <li>1. Relationship management</li> <li>2. Record keeping</li> <li>3. Financial processes</li> <li>4. Event planning</li> <li>5. Health and safety</li> </ol>

<b>Where it is stored</b>	<ol style="list-style-type: none"> <li>1. Microsoft Exchange Online</li> <li>2. SharePoint</li> <li>3. Mailchimp</li> <li>4. Donorfy</li> </ol>
<b>Who has access</b>	CEO, Senior leadership team, board of trustees and fundraising team as authorised.

<b>Institutions (schools, educational settings)</b>	
<b>What we store</b>	<ol style="list-style-type: none"> <li>1. Name</li> <li>2. Contact details (phone/email/address)</li> <li>3. Workplace</li> <li>4. Job title</li> <li>5. Donation record</li> <li>6. Photos</li> <li>7. Event attendance</li> <li>8. Bank details</li> <li>9. Free school meals overview</li> <li>10. Educational healthcare plan overview</li> </ol>
<b>Why</b>	<ol style="list-style-type: none"> <li>1. Relationship management</li> <li>2. Record keeping</li> <li>3. Event planning</li> </ol>
<b>Where it is stored</b>	<ol style="list-style-type: none"> <li>1. Microsoft Exchange Online</li> <li>2. SharePoint</li> <li>3. Microsoft Teams</li> <li>4. Donorfy</li> <li>5. MyConcern</li> <li>6. Upshot</li> <li>7. Mailchimp</li> </ol>
<b>Who has access</b>	CEO, senior leadership team, safeguarding lead, delivery team who work directly in the schools

<b>Volunteers</b>	
<b>What we store</b>	<ol style="list-style-type: none"> <li>1. Contact details (phone/email/address)</li> <li>2. Workplace</li> <li>3. Photos</li> <li>4. DBS details</li> </ol>
<b>Why</b>	<ol style="list-style-type: none"> <li>1. Health &amp; safety</li> <li>2. Child protection</li> <li>3. Record keeping</li> <li>4. Keep in touch for relevant opportunities</li> </ol>
<b>Where it is stored</b>	<ol style="list-style-type: none"> <li>1. SharePoint</li> <li>2. Microsoft Exchange Online</li> <li>3. Donorfy</li> </ol>
<b>Who has access</b>	Central team roles involved in volunteer management.



Suppliers & Partners	
<b>What we store</b>	<ol style="list-style-type: none"> <li>1. Company name</li> <li>2. Key contact</li> <li>3. Company bank details</li> <li>4. Product/service range</li> </ol>
<b>Why</b>	<ol style="list-style-type: none"> <li>1. Payment process</li> <li>2. Management of services</li> </ol>
<b>Where it is stored</b>	<ol style="list-style-type: none"> <li>1. SharePoint</li> <li>2. Microsoft Exchange Online</li> <li>3. Quickbooks</li> <li>4. Microsoft Teams</li> <li>5. Donorfy</li> </ol>
<b>Who has access</b>	Central team roles involved in volunteer management, audit company for purpose of annual audit.

- c. Register of Systems – It is Dallaglio RugbyWorks policy that no staff can store/save any data on their PC/laptop/tablet/phones. All data must be saved to the authorised storage sites. A breach of this may be considered gross misconduct.

System	Data Group	Data inputter	Data controller	Data processor	Data viewer	Who hosts?
Microsoft Office 365	All	All employees	Dallaglio RugbyWorks	Monitor	DRW employees within individual accounts	Microsoft Ireland Ltd
Donorfy	All	Specified employees	Dallaglio RugbyWorks	Donorfy	Specified employees	Donorfy
Player Profiles	Service users	Specified Employees	Dallaglio RugbyWorks	Dallaglio RugbyWorks	Specified Employees	Dallaglio RugbyWorks
Mailchimp	Individual sponsors	Marketing lead	Dallaglio RugbyWorks	Mailchimp	Marketing lead	Mailchimp
Website	Employees Service users Trustees Institutions Suppliers	Website lead	Dallaglio RugbyWorks	Monitor & website maintenance provider	The public	UK Web Solutions Direct
Upshot	Service users	Delivery team	Dallaglio RugbyWorks	Upshot	Delivery team	Upshot
Breathe HR	Employees	HR lead	Dallaglio RugbyWorks	Breathe HR	HR lead and other employees as required	Breathe HR

					per role (e.g. line managers and senior leaders)	
Brightpay	Employees	Finance lead	Beehive	My Payroll	Finance lead	My Payroll
QuickBooks	Suppliers	Finance lead	Beehive	Quickbooks	Finance lead	Quickbooks
MyConcern	Service Users	All employees	Dallaglio RugbyWorks	MyConcern	Safeguarding leads	MyConcern
Criminal Records Services	Employees Trustees Volunteers	HR lead	Dallaglio RugbyWorks	Criminal Records Services	HR lead	Disclosure and Barring Service
Paper based forms	Service users	Delivery team	Dallaglio RugbyWorks	Dallaglio RugbyWorks	Delivery team	N/A

- d. Further information on type of data that is stored and why can be found in our Privacy Notices.

### 1.7 Data Minimisation and Accuracy

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. The Charity shall take reasonable steps to ensure personal data is accurate.
- c. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- d. If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

### 1.8 Sharing Personal Data

- a. We do not normally share personal data with anyone else, but may do so where:
  - i. There is an issue with a participant or parent/guardian that puts an employee at risk.
  - ii. We need to liaise with other agencies.
  - iii. We need to liaise with other service providers – we will seek consent necessary before doing this.
  - iv. Our suppliers or contractors need data to enable us to provide services to our participants or employees. When doing this we will;
    - Only appoint suppliers and contractors that can demonstrate that they comply with data protection laws.
    - Establish a data sharing agreement.
    - Only share data that the supplier or contractor needs to provide their service.
- b. We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for;

- v. The prevention or detection of crime and/or fraud.
  - vi. The apprehension or prosecution of offenders.
  - vii. The assessment or collection of tax owed to HMRC.
  - viii. In connection with legal proceedings.
  - ix. Where the disclosure is required to satisfy our safeguarding obligations.
  - x. Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided.
- c. We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our participants, employees or event attendees/volunteers.

### 1.9 Retention and Archiving Policy

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an Retention & Archiving Policy for each area in which personal data is processed and review this process annually.
- b. Definitions:
- I. Retention – refers to the length of time that any data will be kept. After the retention period, the data will be permanently deleted.
  - II. Archiving notice – we can process personal data for archiving purposes beyond the stated retention period if doing so is in the public interest, or for historical, scientific or statistical purposes. We ensure that archiving does not contravene the rights and freedoms of data subjects and that appropriate technical and organisational safeguards are in place, such as data minimisation, pseudonymisation or encryption.
- c. The Charity will determine how long data is required and define the time periods for which personal data records should be retained, deleted or archived below. If a category of personal data is not specified within this policy, the retention period will be deemed to be 3 years from the date of creation or acquisition. The DPO will annually review the data we hold and update the as appropriate.

Service Users			
Personal data record	Retention period	How	Archiving notice
All participant data	Indefinite	NA	Information kept for statistical archiving purposes and for safeguarding.
IT			
Personal data record	Retention period	How	Archiving notice
Recycle bin	30 days	Automated	
Downloads	2 months	Automated	
Inbox	3 years	Automated	
Deleted emails folder	2 months	Automated	
Spam emails folder	30 days	Automated	
Surveys	3 years from the end of the survey	Manual by relevant employee	

Paper Records			
Personal data record	Retention period	How	Archiving notice
Paper records	48 hours after collection, or if collected on a Friday, retained until following Tuesday	Shredded or disposed of in confidential waste.	Delivery staff obtaining paper records on service users must upload the data onto one of our authorised storage areas and dispose of the paper file within 48 hours of receipt of the data (unless collected on a Friday, in which case retained until following Tuesday).
Event Data			
Personal data record	Retention period	How	Archiving notice
Delegate information	Permanent		Information kept for archiving purposes in the interest of the charity
Event entertainment	The names, pictures, biographies and summaries are usually published on our website, so these details will be permanent.		Names, pictures, biographies and talk summaries stored as public record
Suppliers & sponsors	The names, pictures, biographies and summaries are usually published on our website, so these details will be permanent.		Names, pictures, biographies and talk summaries stored as public record
Donations	Indefinite		Information kept for archiving purposes in the interest of the charity
Business Records			
Personal data record	Retention period	How	Archiving notice
Board Meeting Minutes	Permanent		
Annual Report	Permanent		
Signed Contracts	Permanent		
Complaints	Permanent		
Financial Records			
Personal data record	Retention period	How	Archiving notice
Payroll records	7 years from end of financial year	Manual electronic	

		deletion, followed by server cleanse on all data still to be deleted	
Chart of accounts	Permanent		
Financial procedures	Permanent		
Permanent Audits	Permanent		
Financial statements	Permanent		
Membership payments	7 years from end of financial year	Manual electronic deletion, followed by server cleanse on all data still to be deleted	
Invoices	7 years from end of financial year	Manual electronic deletion, followed by server cleanse on all data still to be deleted	
Bills and expenses	7 years from end of financial year, unless it is a fixed asset which has a longer expected lifetime	Manual electronic deletion, followed by server cleanse on all data still to be deleted	
Bills for Fixed Assets with 7+ Year Lifetime	Until end of financial year for the expected lifetime period	Manual electronic deletion, followed by server cleanse on all data still to be deleted	
Credit Card Purchases and Donations	7 years from end of financial year	Manual electronic deletion, followed by server cleanse on all data still to be deleted	
Card Payment Details (account name,	1 year and 10 days	Manual electronic	

encrypted PAN, expiry date, bank name and card type)		deletion, followed by server cleanse on all data still to be deleted	
Gift Aid Declaration	6 years after your most recent donation	Manual electronic deletion, followed by server cleanse on all data still to be deleted	
HR Records			
Personal data record	Retention period	How	Archiving notice
Employee Name, Roles and Dates of Contracts	Permanent		Name, job title and line manager stored as internal record only for leavers
Employee Personal Details including Contact Details, National Insurance Number, Bank Details, Date of Birth and Gender	Duration of employment	Manual by HR	
Working time records (annual leave, overtime, time off)	6 years after employment ceases	Manual by HR	
Job History including Contracts, Pay and Pension History, Pension Estimates, Resignation Letters	6 years after employment ceases	Manual by HR	
Health and Safety Records	3 years from last entry. Or if an incident involved a child, until they reach the age of 21.	Manual by HR	
Statutory Records including Parental Leave, Redundancy, Payment Calculations	3 years after the end of the tax year that it occurred.	Manual by HR	
Disciplinary Records, Appeals or Other Legal Proceedings	6 years after employment ceases	Manual by HR	

Contractor Records	Duration of contract	Manual by HR	
Trustee and Committee Member Details	Names and posts are permanently retained; other details are removed on resignation	Manual by HR	Names and posts stored as public record
Trustee and Committee Member Applications	Up to the end of their appointment	Manual by HR	
Recruitment Records – CVs and Cover Letters	Unsuccessful candidates – Removed up to 3 months after interviews take place Successful candidates – Kept until the end of employment	Manual by HR lead	
Equal Opportunities Monitoring Forms	Stored as anonymous, aggregated dataset indefinitely; email evidence destroyed immediately; forms destroyed up to 1 month after interviews take place	Manual by HR lead	Statistical data stored indefinitely

### 1.10 Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

### 1.11 Breach

- a. The Charity has carried out a risk assessment (appendix 1.1), reviewed annually, identifying the

risk level for each type of data, risk mitigation measures and action to be taken if the data is breached. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).



# Appendix

## 1.1 Risk Assessment

- We have grouped the types of data held, whether they are held for our staff, suppliers, supporters, institutions or users.
- To reduce all risk, no uniquely identifiable personal data is shared by email or Teams. It is taken from source generation to our secure SharePoint folders or our other storage sites.
- It is Dallaglio RugbyWorks policy that no staff can store/save any data on their PC/laptop/tablet/phones. All data must be saved to the authorised storage sites. A breach of this may be considered gross misconduct.
- Risk to the individual if personal data is breached, key: 1 = low risk impact, 5 = catastrophic impact

Types of Data Held	Risk Level to Individual if Breached	Risk to the company if breached	Risk Mitigation	Action required in the event of a breach	Risk post-mitigation
Name	1	None	Stored on secure database within SharePoint & Breathe HR – access limited	Notify individual	0.5
Name, address	1.5	Minimal	Stored on secure database within SharePoint & Breathe HR – access limited	Notify individual	0.5
Name, address, email, phone number	2	Loss of confidence	Stored on secure database within SharePoint & Breathe HR – access limited	Notify individual	0.5
ID documents	3	Reputation damage, loss of confidence	Only stored in HR file	Notify individual. Report to ICO Investigate	1
DBS check	5	Reputation damage, Loss of Confidence, might impact on ability to recruit	Status checked DBS no longer held by DRW.	Notify individual. Report to ICO Investigate	0

References	4	Reputation damage, Loss of Confidence, might impact on ability to recruit	Only held for staff employed. Destroyed on receipt for staff not employed.	Notify individual. Report to ICO Investigate	0
Name, DOB	1	None	Stored on secure database within SharePoint & Breathe HR – access limited	No action	0.5
Name, NI number	3	Reputation damage, Loss of Confidence	Stored on secure database within SharePoint & BrightPay payroll system– access limited	Notify individual. Report to ICO Investigate	0.5
Name, salary information, length of service	3	Reputation damage, Loss of Confidence, might impact on ability to recruit	Stored on secure database within SharePoint & Breathe HR – access limited	Notify individual. Report to ICO Investigate	1
Name, bank details (staff, suppliers, supporters)	4	Reputation damage, Loss of Confidence, might impact on ability to recruit/Secure supplier Loose supporters	Stored on secure database within SharePoint & Quickbooks & BrightPay– access limited	Notify individual/supplier. Report to ICO Investigate	1
Name, equality monitoring data	2	Low organisational impact	Stored on secure database within SharePoint and password protected.	Notify individual	0.5
Name, medical conditions	5	Low organisational impact	Stored on secure database within SharePoint and password protected.	Notify individual	0.5
Job applications	4	Reputation damage, Loss of Confidence, might impact	Stored on secure database within SharePoint &	Notify individual. Report to ICO Investigate	1

		on ability to recruit	Breathe HR – access limited. Unsuccessful candidates destroyed after 3 months.		
Name, images	3	Reputation damage, Loss of Confidence, potential Safeguarding risk	Stored on secure database within SharePoint – access limited. For any images that we keep we have consent to hold them and to publish them.	Notify individual. Report to ICO Investigate	0.5
Name, school	3	Reputation damage, Loss of Confidence, potential Safeguarding risk	Stored on secure database within SharePoint, MyConcern and UpShot – access limited. For any data that we keep we have consent to hold and to publish.	Notify individual. Notify School Report to ICO Investigate	1
Name & contact details of parent/guardian of participant	4	Reputation damage, Loss of Confidence, potential Safeguarding risk	Stored on secure database within SharePoint and UpShot – access limited. We have consent to hold data.	Notify individual. Notify Parent/guardian Report to ICO Investigate	1
Name, personal details of young persons social mental health school history	5	Reputation damage, Loss of Confidence, Safeguarding risk	Stored on secure database within SharePoint, My Concern and UpShot – access limited. Password protected. We have consent to hold data.	Notify individual. Notify School Report to ICO Investigate	1
Name, safeguarding concerns	5	Reputation damage, Loss of Confidence,	Stored on secure database within SharePoint and	Notify individual. Notify School Report to ICO Investigate	1

		Safeguarding risk	MyConcern – access limited. Password protected.		
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## 1.2 Privacy Notice - Employees and Contractors

### 1. Introduction

Dallaglio RugbyWorks is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you.

Dallaglio RugbyWorks “The Company” collects, stores and processes personal data relating to its employees in order to manage the employment relationship. This privacy notice sets down how the Company collects and uses personal information about you during and after your working relationship with us.

This privacy notice applies to current and former employees, workers and contractors. This notice does not form part of a contract of employment or any contract to provide services and may be updated at any time.

The Company is committed to protecting the privacy and security of your personal information. The Company is committed to being clear and transparent about how it collects and uses that data and to meeting its data protection obligations.

### 2. Data Protection Principles

The Company will comply with data protection law. This means that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
- Relevant to the purposes we have told you about and limited to those purposes only;
- Accurate and kept up to date;
- Kept only for such time as is necessary for the purposes we have told you about; and
- Kept securely.

### 3. What Information Does the Company Collect and Process?

The Company collects and processes a range of personal information (personal data) about you. Personal data means any information about an individual from which the person can be identified. This includes:

- Personal contact details, such as your name, title, address and contact details, including email address and telephone number;
- date of birth;
- gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the Company;
- information about your remuneration, including entitlement to benefits such as pensions;
- details of your bank account, tax status and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- copy of driving licence;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, training you have participated in, performance improvement plans and related correspondence;
- CCTV footage and other information obtained through electronic means e.g. swipe card records.

We may also collect, store and use the following special categories of more sensitive personal information:

- information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments;
- details of trade union membership;
- information about your criminal record; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The Company collects this information in a variety of ways. For example, data is collected through the application and recruitment process and during work-related activities throughout the period of working for us.

In some cases, the Company collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the Company's HR systems and in other IT systems (including the Company's email system).

#### **4. Why Does The Company Process Personal Data?**

The Company needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract.

In addition, the Company needs to process data to ensure that we are complying with our legal obligations, for example, we are required to check an employee's entitlement to work in the UK.

In other cases, the Company has a legitimate interest in processing personal data before, during and after the end of the employment relationship.

## 5. Situations In Which We Will Use Your Personal Information

Situations in which we will process your personal information are listed below. In order to:

- make decisions about recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of whom to contact in the event of an emergency), and records of employee contractual and statutory rights;
- check you are legally entitled to work in the UK;
- gather evidence for, and keep a record of, disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- pay you and, in the case of employees, make deductions for tax and National Insurance;
- make decisions about salary reviews and compensation;
- operate and keep a record of employee performance and related processes;
- keep records of training and development requirements;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- ascertain your fitness to work;
- operate and keep a record of other types of leave (such as maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- deal with legal disputes involving you or other employees, workers and contractors; and
- facilitate equal opportunities monitoring in the workplace.

## 6. If You fail to Provide Personal Information

If you do not provide certain information when requested, the Company may not be able to perform the contract we have entered into with you, such as paying you or providing a benefit. You may also have to provide the Company with data in order to exercise statutory rights, for example in relation to statutory leave entitlements.

## 7. Change of Purpose

The Company will only use your personal information for the purpose for which it was collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will advise you of this and explain the legal basis which allows us to do so.

You should be aware that we may process your personal information without your knowledge or consent where this is required or permitted by law.

## 8. How We Use Sensitive Personal Information

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (for example, in relation to employees with disabilities and for health and safety purposes).

Data used by the Company for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

#### **9. Information About Criminal Convictions**

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

#### **10. Automated Decision-Making**

Our employment decisions are not based solely on automated decision-making.

#### **11. For How Long Do You Keep Data?**

The Company will only hold your personal data for as long as is necessary to fulfil the purposes we collected it for, including any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The periods for which your data is held after the end of employment will be in accordance with applicable laws and regulations

#### **12. Who Has Access to Data?**

Your information will be shared internally only between members of HR, Directors of the Company and line managers where relevant.

The Company shares your data with third parties where required by law, where it is necessary in order to administer the working relationship with you or where we have another legitimate interest in doing so. The following services are carried out by third party service providers: payroll, pension administration, benefits provision and administration, IT services. The Company may also share your data with other third parties, for example, in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

The Company will not transfer your data to countries outside the European Economic Area.

#### **13. How Does the Company Protect Data?**

The Company takes the security of your data seriously. The Company has internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed, and is not

accessed except by its employees in the performance of their duties. Details of these measures are available on request.

When the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

#### 14. Your Duty to Inform Us of Changes

It is important that the personal information we hold about you is accurate and current. Please be sure to keep us informed if your personal information changes during your time working with us.

#### 15. Your Rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request (known as a “data subject access request”);
- require the Company to change incorrect or incomplete data;
- request erasure of your personal information. This enables you to ask the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to suspend the processing of your personal data for a period of time if data is inaccurate or there is a dispute about its accuracy or the reason for processing it.

If you would like to exercise any of these rights, or you have any questions about the privacy notice, please contact your manager.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner’s Office.

### 1.3 Privacy Notice – Website

#### 1. Introduction

Dallaglio RugbyWorks promises to respect and look after all personal data you share with us, or that we get from other organisations. We will always keep it safe. We aim to be clear when we collect your data about what we’ll use it for, and not do anything you wouldn’t reasonably expect. We will never sell your personal data to other organisations, and will only ever share it in appropriate, legal or when pre-agreed data sharing protocols are in place.

Developing a better understanding of our supporters through their personal data means we can make better decisions, fundraise more efficiently and, ultimately help us reach our goal of supporting the young people on the Dallaglio RugbyWorks programme into sustained, education, employment or training.



This privacy notice informs you how we look after your personal data when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you. By using the site, you are accepting the practices described in this privacy policy.

## 2. How To Contact Us

We would appreciate the chance to deal with any concerns, so please contact us in the first instance. Contact us on 0203 848 4695 or email us at [info@dallaglorugbyworks.com](mailto:info@dallaglorugbyworks.com) if you have any questions or concerns.

You have the right to make a complaint at any time to the relevant supervisory authority for data protection issues. In the UK, this is the Information Commissioner's Office, [www.ico.org.uk](http://www.ico.org.uk).

## 3. Changes To The Privacy Notice And Your Duty To Inform Us Of Changes

We keep our Privacy Policy under regular review. Any updates will be published at this URL. Please review the policy regularly. This version was last updated September 2023.

It is important that the personal data we hold about you is accurate and current. It is your responsibility to keep us informed if your personal data changes during your relationship with us.

## 4. Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 5. The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, middle name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We do not collect any information about criminal convictions and offences.

## 6. Where We Collect Data About You From

We collect information in the following ways:

- When you give it to us DIRECTLY:

You may give us your Identity, Contact, Financial, Profile and Marketing Data by filling in forms or by corresponding with us by post, phone, email, social media channels, virtual communications platforms or otherwise. This includes personal data you provide when you:

- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- register for an event; or
- give us some feedback.

- When you give it to us INDIRECTLY:

Your information may be shared with us by independent event organisers, for example fundraising sites like JustGiving. These independent third parties will only do this if you've indicated you're happy for them to do so. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

- When you give permission to OTHER ORGANISATIONS to share it:

You may have provided permission for a company or organisation to share your data with third parties, including charities. This could be when you buy a product or service or register for an online competition. Depending on your settings or the privacy policies for social media and messaging services like Facebook, Whatsapp or Twitter, you might give us permission to access information from those accounts or services. The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them.

- When it is PUBLICLY AVAILABLE:

This may include information found in places such as Companies House and information that has been published in articles/ newspapers. We may combine information you provide to us

with information available from external sources in order to gain a better understanding of our supporters to improve our fundraising methods, products and services.

- When we collect it as you use our WEBSITES:
  - As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.
  - Technical Data from the following parties:
    - a) analytics providers such as Google which may be based inside or outside the EEA;
    - b) advertising networks which may be based inside or outside the EEA; and
    - c) search information providers which may be based inside or outside the EEA.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services which may be based inside or outside the EEA.

## 7. Google Analytics

We have integrated the component Google Analytics (with anonymisation function) on this website. Google Analytics is a web analytics service. Web analysis is the gathering, collection and analysis of data about the behaviour of visitors to websites. Among other things, a web analysis service collects data on which website a data subject has come to a website from (so-called referrers), which subpages of the website were accessed or how often and for which period of time a subpage was viewed. A web analysis is mainly used to optimize a website and for the cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Google Analytics uses cookies. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. Google might transfer the personal information collected via this technical procedure to third parties.

You can prevent the storage of cookies by a corresponding setting of your browser software; however, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible. In addition, you may prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

This browser add-on informs Google Analytics via JavaScript that no data and information about website visits may be transmitted to Google Analytics. In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs. Further information and Google's applicable privacy regulations can be found at <https://policies.google.com/privacy?hl=en>

Our website also uses Google Analytics performance reports relating to demographics and interests and reports on Google Display Network impressions. You can disable Google Analytics for display advertising and customize the ads on the Google Display Network by visiting the ad settings at this link: <https://adssettings.google.com>

Our website also uses Google Ad Manager to assist us with the delivery of relevant ads.

Our website also uses Google Tag Manager. Through this service so-called website tags can be managed centrally via a user interface. Google Tag Manager only implements tags. No cookies are used and no personal information is collected. For each third-party data collection, Google will provide a respective privacy policy: <https://www.google.com/analytics/tag-manager/use-policy/> However, Google Tag Manager will not access these data. If deactivation has been implemented for certain domains / websites or cookies, it will remain in effect for all tracking tags as far as they are implemented with the Google Tag Manager.

## 8. How We Use Your Personal Data

We will only use your personal data in accordance with applicable laws. There are a number of lawful bases for processing personal data. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
- This means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to **comply with a legal or regulatory obligation**. This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- Administer your donation or support your fundraising, including processing Gift Aid. We will collect personal data from you in order to take donations and process Gift Aid. Legally we are obliged to keep this information for 6 years. If you are happy for us to claim Gift Aid on goods you've donated, and they raise over £100, in one tax year, we have to contact you quarterly to let you know what Gift Aid we're claiming.
- To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Gathering opinions and feedback on our products and services.
- To use data analytics to improve our website, products and services, marketing, customer relationships and experiences.

## 9. Marketing

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us, and unsubscribe links are included on every marketing communication. Please see the table below to understand the lawful basis that we will rely on to process your personal data in various circumstances.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have:

- requested information from us;
- made purchases from us;
- provided us with your details when you attended an event
- provided us with your details when you registered for an event, competition, or promotion; provided us with your details for any other reason;

and, in each case, you have not opted out of receiving that marketing.

We do not sell or share personal details to third parties for the purpose of marketing.

We will only share your details with third party organisations when it's necessary:

- Provide you with the services you've asked for – we will make sure you're happy for us to do this before anything happens and will explain who we are sharing the data with
- Administer your participation in an event or fundraising activity

If we ever need to share data for these purposes, we will always take the upmost care, will make sure only essential data is transferred, and that it's done so securely and safely.

## 10. Change Of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 11. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances, you can ask us to delete your data. See Your Legal Rights below for further information.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 12. Your Rights

Where we are the data controller, and under certain circumstances, you have the following rights in relation to your personal data:

- **The right to request access** to your personal data (a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **The right to request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **The right to request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **The right to object to the processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **The right to request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **The right to request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **The right to withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please contact us on 0203 848 4695 or email us at [info@dallaglorugbyworks.com](mailto:info@dallaglorugbyworks.com) in the first instance to discuss and exercise any of the rights set out above.

### 13. Time Limit To Respond

We try to respond to all legitimate requests (where we are the data controller) within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 1.4 Privacy Notice – Service Users

### 1. Introduction

Dallaglio RugbyWorks is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you.

Dallaglio RugbyWorks “The Company” collects, stores and processes personal data relating to its employees in order to manage the employment relationship. This privacy notice sets down how the Company collects and uses personal information about you during and after your working relationship with us.

This privacy notice applies to current and former participants that have taken part in RugbyWorks interventions.

The Company is committed to protecting the privacy and security of your personal information. The Company is committed to being clear and transparent about how it collects and uses that data and to meeting its data protection obligations.

### 2. Data Protection Principles

The Company will comply with data protection law. This means that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
- Relevant to the purposes we have told you about and limited to those purposes only;
- Accurate and kept up to date;
- Kept only for such time as is necessary for the purposes we have told you about; and
- Kept securely.

### 3. What Information Does the Company Collect and Process?

The Company collects and processes a range of personal information (personal data) about you. Personal data means any information about an individual from which the person can be identified. This includes:

- Personal contact details, such as your name, title, address and contact details, including email address and telephone number; date of birth; gender; parent/guardian.

We may also collect, store and use the following special categories of more sensitive personal information:

- Equality details; ethnicity; disability status; free school meal status; looked after/care leaver status
- Child safety and welfare forms.

The Company collects this information in a variety of ways. For example, data is collected through the registration process when joining a RugbyWorks intervention via a survey or via registering on our website.

Your information is securely stored. All data collected in this form will be stored on a secure electronic drive. Only Dallaglio RugbyWorks designated data controllers and processors will have access to the data captured on this form.

In line with GDPR regulations personal data shall be kept for no longer than is necessary for the purposes for which it is being processed. We will then dispose your information by deleting all copies stored media on our secured electronic drive.

#### **4. Why Does The Company Process Personal Data?**

The Company needs to process data because:

- We have a contractual obligation.
- We have a legal obligation
- We have a vital interest
- We need it to perform a public task
- We have a legitimate interest.

#### **5. Situations In Which We Will Use Your Personal Information**

Situations in which we will process your personal information are listed below:

In order to:

- Monitor and evaluate the impact of RugbyWorks interventions
- Highlight and share case studies about RugbyWorks interventions
- Report to funders
- Compile our Annual Report
- Manage our relationship with you, including notifying you about changes to our contract or services or asking you to provide us with feedback
- For health & safety reasons
- For safeguarding reasons

#### **6. If You fail to Provide Personal Information**

If you fail to provide certain information when requested either by law, or under the terms of a contract we have with you, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a service.)

#### **7. Change of Purpose**



The Company will only use your personal information for the purpose for which it was collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will advise you of this and explain the legal basis which allows us to do so.

You should be aware that we may process your personal information without your knowledge or consent where this is required or permitted by law.

#### 8. How We Use Sensitive Personal Information

Our reporting to funders and statistics compiled for our Impact/Annual Report is completely anonymised. We use Participant Stories / Case Studies to showcase our impact.

#### 9. For How Long Do You Keep Data?

The Company will only hold your personal data for as long as is necessary to fulfil the purposes we collected it for, including any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### 10. Who Has Access to Data?

The Company shares your data with third parties where required by law, where it is necessary in order to administer the working relationship with you or where we have another legitimate interest in doing so. The Company may also share your data with other third parties, for example, in the context of reporting to a funder. In those circumstances the data will be subject to confidentiality arrangements.

The Company will not transfer your data to countries outside the European Economic Area.

#### 11. How Does the Company Protect Data?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Details of these measures are available on request.

When the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

#### 12. Your Duty to Inform Us of Changes

It is important that the personal information we hold about you is accurate and current. Please be sure to keep us informed if your personal information changes during your time working with us.

#### 13. Your Rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request (known as a “data subject access request”);
- require the Company to change incorrect or incomplete data;
- request erasure of your personal information. This enables you to ask the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to suspend the processing of your personal data for a period of time if data is inaccurate or there is a dispute about its accuracy or the reason for processing it.

If you would like to exercise any of these rights, or you have any questions about the privacy notice, please contact your Dallaglio RugbyWorks coach, mentor, Programme Manager or Designated Safeguarding Lead.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner’s Office.

Contact your line manager if you have any further queries about this section.

### 1.5 Consent Forms

By signing below I confirm that I give permission and consent for child to engage fully with Dallaglio RugbyWorks in the 23/24 academic year and beyond. This includes but is not limited to:

- Weekly RugbyWorks sessions
- Offsite Career Taster Days
- RugbyWorks Tournaments
- RugbyWorks sending parents/carers correspondence relating to the intervention
- RugbyWorks sending your child correspondence relating to the intervention
- RugbyWorks collecting data on your child from the school so we can monitor and evaluate the impact of our intervention

School:

Young Person Name:

Young Person Phone Number:

Young Person Email:

Parent/Carer Name:

Parent/Carer Phone Number:

Parent/Carer Email:

I agree to give Dallaglio RugbyWorks consent as outlined above. Please Sign and date.

### Media Consent Form

All data collected in this form will be stored on a secure electronic drive. Only Dallaglio RugbyWorks designated data controllers and processors will have access to the data captured on this form.

### Parents/Carers

I confirm that I have read Dallaglio RugbyWorks's attached privacy policy.

### *I agree to*

- my child's photograph/appearance on video being used within the Dallaglio RugbyWorks promotional material for display purposes
- my child's photograph/appearance on video being used within other printed or digital publications
- my child's photograph/appearance on video being used on the Dallaglio RugbyWorks website
- my child's photograph/appearance on video being used on Dallaglio RugbyWorks's social media pages
- my child appearing on Third party channels and promotions that support Dallaglio RugbyWorks or are endorsed by Dallaglio RugbyWorks

### *I understand*

- the potential risks associated with the use and distribution of these images
- how these images or videos will be stored with Dallaglio RugbyWorks and how long for
- that if I withdraw consent for my child's image/appearance on video to be used or shared in the future, it may not be possible to remove images that have already been published or distributed that at many events, Dallaglio RugbyWorks and others will reasonably wish to take wide angle, general photos during or at specific points in the event
- that I must gain permission before sharing photographs/videos of other people's children on social media

I agree to give consent for Dallaglio RugbyWorks to capture photography/videos of me. Please Sign and date.

### Dallaglio RugbyWorks Privacy Policy

**Name:** Dallaglio RugbyWorks

**Address:** The Barn, Kings Newton Hall, Main Street, Kings Newton, Derbyshire, DE73 8BX

**Phone Number:** 0203 848 4695

**E-mail:** [info@dallaglorugbyworks.com](mailto:info@dallaglorugbyworks.com)

**Website:** [www.dallaglorugbyworks.com](http://www.dallaglorugbyworks.com)

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting [info@dallaglorugbyworks.com](mailto:info@dallaglorugbyworks.com)
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.
- (f) We have a legitimate interest.

### How we store your personal information

**Your information is securely stored** All data collected in this form will be stored on a secure electronic drive. Only Dallaglio RugbyWorks designated data controllers and processors will have access to the data captured on this form.

In line with GDPR regulations personal data shall be kept for no longer than is necessary for the purposes for which it is being processed. We will then dispose your information by deleting all copies stored media on our secured electronic drive.

### Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [info@dallaglorugbyworks.com](mailto:info@dallaglorugbyworks.com) if you wish to make a request.

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@dallaglorugbywork.com](mailto:info@dallaglorugbywork.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

### 1.6 Registration Form

<b>School Name</b>	
<b>Full Name</b>	
<b>Date of Birth</b>	
<b>Sex</b>	
<b>Home Address</b>	
<b>Home Post Code</b>	
<b>Country of Birth</b>	
<b>Parent/Carer Contact number</b>	

<b>Parent/Carer Email address</b>	
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What is the Young Person's ethnic group? (mark with an X)

<b>White</b>		<b>Asian/Asian British</b>	
English/Welsh/Scottish/Northern Irish/British		Indian	
Irish		Pakistani	
Gypsy/Irish Traveller		Bangladeshi	
Any other white background please describe		Chinese	
<b>Black/African/Caribbean/Black British</b>		Any other Asian background please describe	
African		<b>Other ethnic groups</b>	
Caribbean		Arab	
Any other Black/African/Caribbean background please describe		Any other mixed/multiple ethnic background please describe	

<b>Please answer yes or no to the below</b>	<b>Yes</b>	<b>No</b>
Disability if yes please describe		
Looked after/care leaver		
Free school meals		