

Compliance with GDPR

Case Study – Sharing data

Jane Walter, Business Manager
Hockliffe Lower School

The school was approached by a local football club offering 6 sessions of free football coaching. We were interested and responded as such to their email. The funding for these free sessions was via the Premier League Primary Stars Programme. We were provided with the SLA and noted that we were being asked to provide the club with the following personal data to support the funding.

- Children's names
- Addresses (including postcodes)
- DOB
- Gender
- Ethnicity
- Medical conditions
- Any behavioural issues
- Photographs of children taking part in the sessions (provided parental consent had been sought).

Having recently been on GDPR training the school felt that this was an excessive amount of personal data being requested and challenged the request with the club. We were then forwarded a document 'Data Protection FAQs for Schools', which has been drawn up by lawyers acting for the Premier League. It should be noted that this had not been updated in line with GDPR legislation, but advised that it complied with the Data Protection Act 1988. The document reinforced the information required was in line with current DP regulations and we were not required to obtain consent from parents unless it related to sensitive personal data (e.g. medical conditions) or when a parent had requested that the school never share personal details with a third party.

We still felt very uneasy about proceeding and requested advice from an external GDPR trainer. It was agreed that the request did not comply with the new GDPR regulations and we were advised to go back to the club and voice our concerns regarding GDPR compliance and agree on a reduction to the personal data required, as well as clarifying the procedures on the disposal of information provided.

After discussion with the club it was agreed that no information would be collected via email (due to it being an insecure form of communication), but collected from the school by the football coach. Only the children's names and year groups would be provided. It was also agreed that because the lessons were taking place during curriculum time and a teacher would be present at all times, medical information would not be collected. In addition photography was not allowed. We were given assurances both vocally and in writing that once information collected was uploaded onto their software all paperwork would be shredded.

We believe that the moral of this story is 'If it does not feel right you must challenge'. If we had not succeeded in a reduction of personal data requested we would not have hesitated in refusing the sessions offered.