



Player Record Access Management Policy

Policy Name	Player Record Access Management
Version Date	July 2026
Drafted By	Data Proof Ltd
Authorised By	Club Chairman

Introduction

Sevenoaks Town Football Club (the “Club”) is committed to the FA Principles of “football for all” and actively works to provide a safe, enjoyable, supportive, and inclusive environment for everyone involved in club activities.

To support this, the Club maintains a central Player Record which includes required Player Contact and Emergency Contact information, and additional information related to:

- Medical information including medical issues, medicines, current and previous injuries;
- Wellbeing information
- SEND information which may assist the Club to engage the Player (e.g. communication preferences). School reports and EHCP (Education, Health & Care Plans) are not required.
- Suggested practical information about additional support that may benefit a Player’s engagement in Club activities (e.g. engagement, training, match activities)
- Agreed reasonable adjustments to facilitate participation

This additional information is considered ‘**Special Category Personal Data**’ under UK Data Protection Legislation and is processed by the Club only under an appropriate lawful basis, including Explicit Consent, Legal Obligation, or Vital Interests.

There is no requirement on a Player to provide this information. Providing the information is completely at the Player’s discretion.

The Club will only use this information to protect the vital interests of the player and to enhance their engagement in Club activities. Please see the section on “Club Responsibilities” for further information.



Key Terms:

- **Player** is the person who is registered to play or train at Sevenoaks Town FC, including an Authorised Representative who is acting on behalf of the player.
- **Authorised Representative** is an individual acting on behalf of a Player such as a parent, guardian, partner/spouse, or other individual authorised by the Player. References to Player includes Authorised Representative in all cases.
- **Player Record** is the central register of Player information maintained in a system managed by the Club. The Player Record is available to the Player, Coaches, Team Officials, and Club Officials. All access to the Player Record is recorded and audited.
- **Coaches** are the registered individuals who deliver engagement, training, or matchday activities for the players. Club Coaches are contracted by Sevenoaks Town FC. Parent Coaches are vetted volunteers registered with Sevenoaks Town FC.
- **Club Officials** are individuals who administer the club and/or individual teams organising engagement, training, and match activities. Club Officials and Team Officials may be contracted by Sevenoaks Town FC or may be registered as volunteers of the club.
- **Vital Interests**, as defined in UK Data Protection Legislation, is processing of personal data to protect someone's life, where there is no alternative means of processing the data (e.g. consent of the Player, or an Authorised Representative)
- **Legitimate Reason** to access a Player Record includes safeguarding, medical emergencies, or administrative necessity directly related to the Player's participation in Club activities.



Club Responsibilities:

The Club is responsible for maintaining a system which records, manages, and provides access to the Player Record.

The Club is responsible for ensuring that the Player Record is kept securely. This includes implementing appropriate technical and organisational measures to protect the data from unauthorised access or use.

The Club is responsible for providing access to the Player Record for authorised Coaches, Team Officials, and Club Officials and ensuring that such access is removed when it is no longer required.

Access to Player Records is provided to Club Officials, Team Officials, Club Coaches and Parent Coaches who:

- Have been appropriately registered with and/or contracted by the Club, and authorised by a senior Club Official to access the system; and
- Holds a current FA Enhanced DBS Check; and
- Holds a current FA Safeguarding certificate (e.g. Safeguarding for Children, Safeguarding for Committee Members, Safeguarding for All)
- The Club is responsible for revalidating DBS and Safeguarding checks periodically as per FA guidance, and will restrict access to the Player Record when appropriate.

The Club is responsible for ensuring that access to a Player Record is for a Legitimate Reason. To achieve this, the Club will appoint Club Officials who are responsible for the regular audit of access to the Player Records to ensure that access to the Player Record is for legitimate reasons.

The Club is responsible for providing a monitored email address for Coaches, Team Officials, and Club Officials, to report a Legitimate Reason for accessing a Player Record. The Club will investigate access to a Player Record which has not been reported in this manner.

The Club may take disciplinary action if a Player Record is accessed without a Legitimate Reason.

The Club will provide a method for the Player to update and/or remove the information on the Player Record at any time. The Player can complete this themselves by accessing and updating their Player Record or by contacting the Club by email to

office@sevenoakstown.co.uk.

The Club will ensure that the Player Record is securely deleted or anonymised when no longer required as per the Club's [Privacy Notice](#) (Section Heading: How long we hold your personal data)

Player Responsibilities:

The Player, or their Authorised Representative, is responsible for keeping their Player Record updated.



The Player **may** provide information to the Club in relation to their Health and Wellbeing.

They may also provide information to the club on how to use this information to make reasonable adjustments to facilitate their participation and enjoyment of Club activities.

There is no requirement for the Player to provide the additional information but Players are **strongly encouraged** to provide medical information so that the Club, Club Officials, and Coaches can ensure the safety of the player in an emergency situation.

This information may include allergies, medication, recent/historic injuries, or other information that the Player may deem relevant.

Please Note: If you choose to provide Medical, Health or Wellbeing information, this information will be available to all Club Officials and Coaches that have a Legitimate Reason to access it.

To understand how the Club handles your data, Players are encouraged to read the Clubs **Privacy Notice** available on the website.

Players have the right to access, rectify, erase, or restrict processing of their data, in line with UK Data Protection Law.

They can access their Player Record at any time by logging into their account at **<https://register.sevenoakstownfc.co.uk/account/sign-in>**

A player can also request updates or changes by contacting the Club at **office@sevenoakstownfc.co.uk**.



Coach Responsibilities:

Coaches have access to all Player Records by logging into their account at <https://register.sevenoakstownfc.co.uk/account/sign-in>.

The ability to access does not convey the right to access.

All Coaches **must** have a Legitimate Reason for accessing a Player record.

Coaches are ***strongly encouraged*** to regularly review the Player Records of Players they are directly engaged with – either through engagement, training, or match activities. This will ensure that Coaches have the most up-to-date information about their Players.

Coaches are ***discouraged*** from maintaining personal records outside of Club systems of this information – including printing player records – unless there is a significant risk to the Vital Interests of the Player (e.g. Severe allergies). Any printed records should not be retained and be securely disposed of when no longer required. Digital records should not be maintained on personal devices.

If a Coach has a Legitimate Reason to access a Player Record for a player not directly related to their activities within the Club (e.g. for a player who is not a member of their playing squad), the Coach **must** report this access to the Club in writing to welfare@sevenoakstownfc.co.uk at the earliest possible opportunity.

A Coach **must** be able to provide the Club with a Legitimate Reason for accessing a Player Record when requested. Failure to do so may lead to access restrictions and/or disciplinary action.

Coaches **must** maintain the confidentiality of Player Records as per Club guidance. Coaches must not provide their login details to any else and, if they suspect that their login details may be compromised, should immediately change their password and report this to the Club.

Coaches are encouraged to provide their own relevant Medical History to the Club.

Coach Declaration:

I have received and read a copy of this policy and understand my responsibilities.

If I have a Legitimate Reason to access a Player Record for a Player not directly under my control, I will send an email declaring the access and my Legitimate Reason to welfare@sevenoakstownfc.co.uk at the earliest possible opportunity.

Coach Name	
Date	
Signature	



Club Official Responsibilities:

Club Officials have access to all Player Records by logging into their account at <https://register.sevenoakstownfc.co.uk/account/sign-in>.

The ability to access does not convey the right to access.

All Club Officials **must** have a Legitimate Reason for accessing a Player Record.

Club Officials are ***strongly encouraged*** to regularly review the Player Record of Players they are directly engaged with – either through engagement, training, or match activities. This will ensure that Club Officials have the most up-to-date information about their Players.

Club Officials should also regularly encourage Coaches to access relevant Player Records – for example, where an update has been made to medical/injury information.

Club Officials **should not** send such information to Coaches through alternative media (e.g. email, SMS, WhatsApp) but should direct the coach to access the relevant Player Record.

Club Officials are ***discouraged*** from maintaining personal records outside of Club systems of this information – including printing the Player Record – unless there is a significant risk to the Vital Interests of the Player (e.g. Severe allergies). Any printed records must be securely disposed of when no longer required. Digital records should not be maintained on personal devices.

If a Club Official has a Legitimate Reason to access a Player Record for a player not directly related to their activities within the Club (e.g. for a player who is not a member of their playing squad), the Team Official **must** report this access to the Club in writing to welfare@sevenoakstownfc.co.uk at the earliest possible opportunity.

A Team Official **must** be able to provide the Club with a Legitimate Reason for accessing a Player Record when requested. Failure to do so may lead to access restrictions and/or disciplinary action.

Club Officials **must** maintain the confidentiality of Player Records as per Club guidance in the Data Protection Policy, the Privacy Notice, and other guidance that may be issued from time to time.

Club Official Responsibilities:

I have received and read a copy of this policy and understand my responsibilities.

If I have a Legitimate Reason to access a Player Record for a Player not directly under my control, I will send an email declaring the access and my Legitimate Reason to welfare@sevenoakstownfc.co.uk at the earliest possible opportunity.

Coach Name	
Date	



Signature