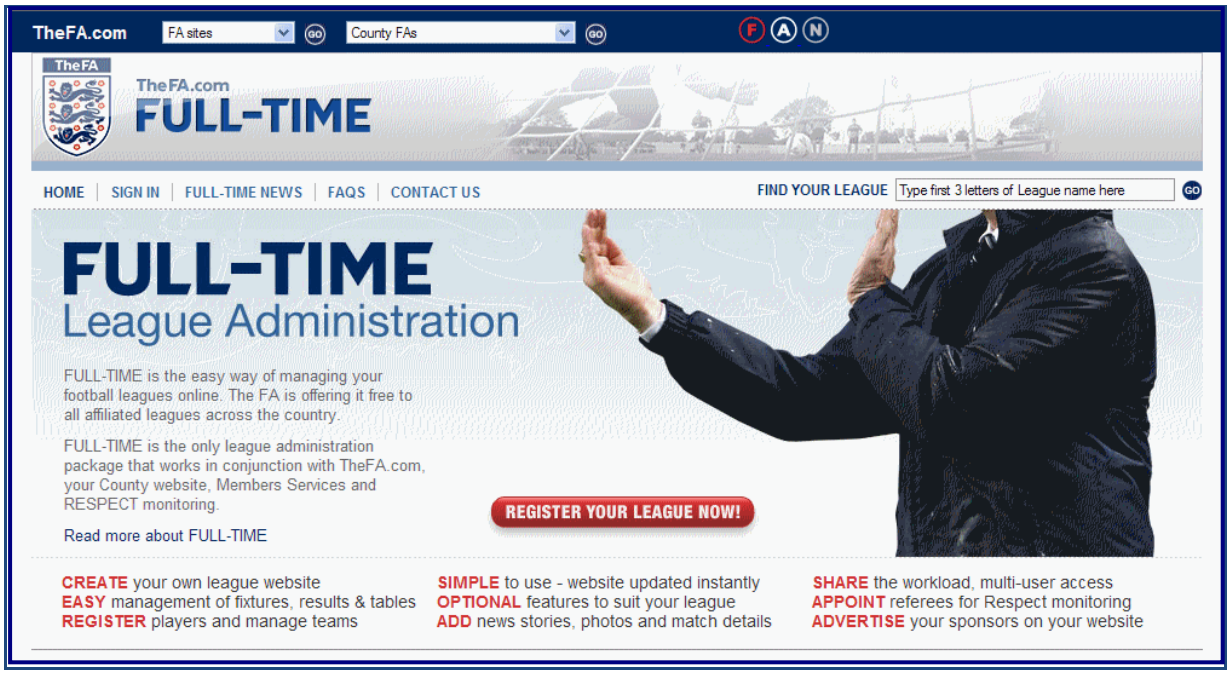
Full-Time

General Data Protection Regulation (GDPR)

Version 5.3



Background

GDPR (General Data Protection Regulations) comes into place from 25th May 2018 onwards, and the Football Association, in conjunction with Muckle LLP, has provided a number of online resources to give guidance to leagues and clubs.

These can be found at:-

https://www.muckle-llp.com/wp-content/uploads/2018/03/DATA-PROTECTION-County-FA-Guide.pdf

https://www.muckle-llp.com/what-we-do/sports/the-football-association/gdpr-factsheets/

https://www.muckle-llp.com/what-we-do/sports/the-football-association/fa-online-training-modules/

https://www.muckle-llp.com/wp-content/uploads/2018/04/FA-FAQs-FINAL.pdf

Introduction

In order to comply with the requirements of GDPR (General Data Protection Regulations) a number of changes have been made to Full-Time, which can be found detailed within this document. Some of these will be immediately visible to users (such as the need to provide date of birth on login) and some will only be required if a league is asked to manage a request.

This document will be updated as further functionality is added as a consequence of the requirements from GDPR.

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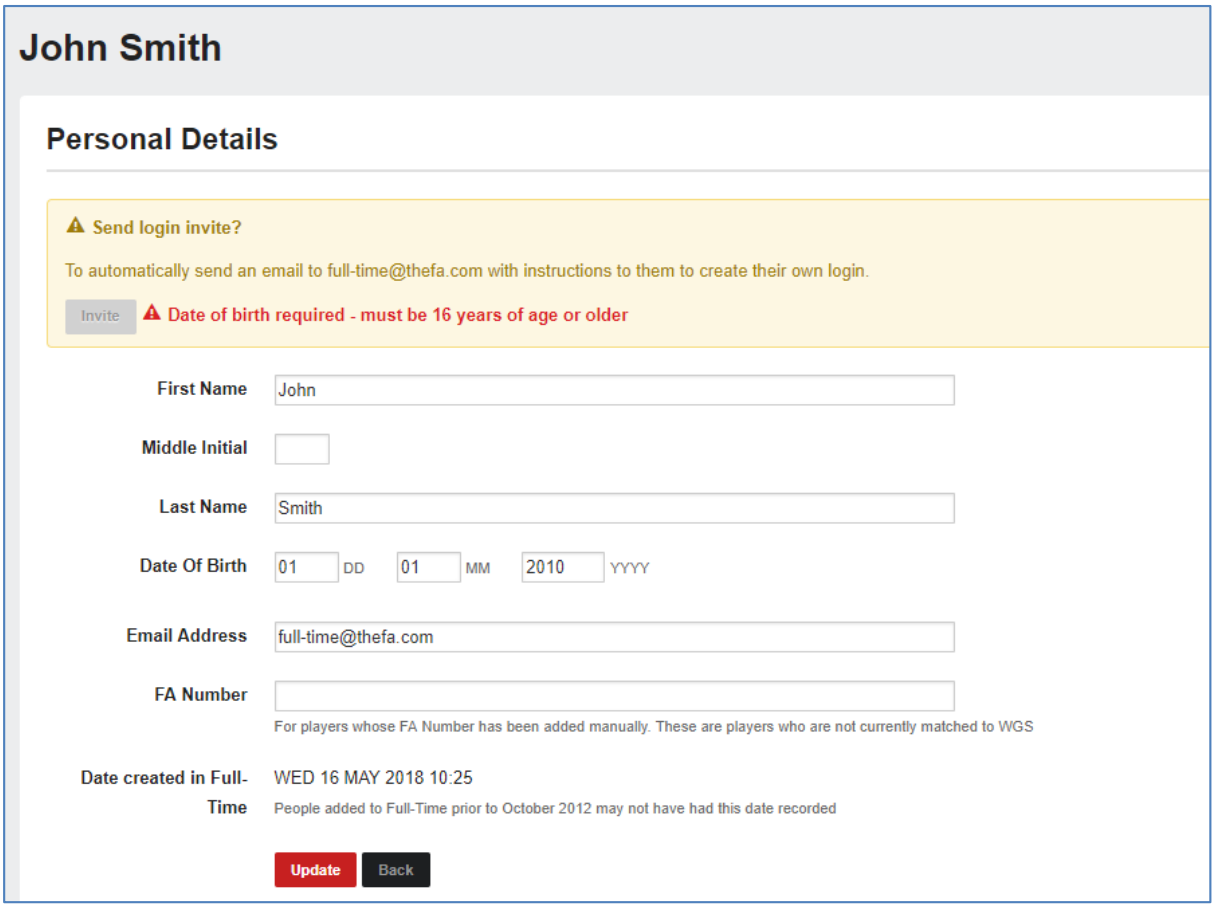
1.0 Login restricted to individuals 16 and over

To login to Full-Time, you must now ensure that the individual concerned is aged 16 or over. Although in the past this has been the common practice, we are now requiring that the date of birth is provided for every single individual who logs in.

You should note that logins should not be shared, and if more than one individual requires access to the data for a team or league, they should each have their own individual login, in their name and with their date of birth provided.

1.1 How to… Set Date of Birth for New Admin Users

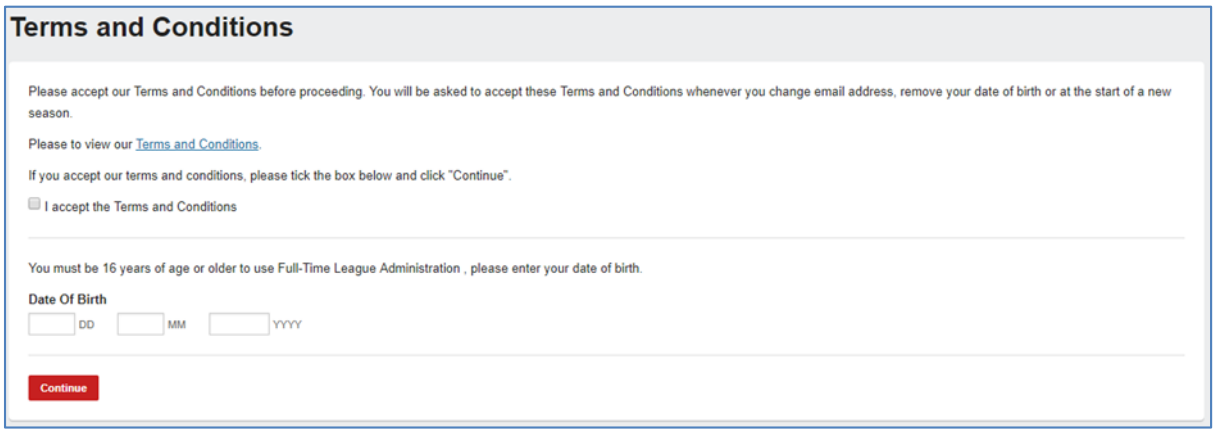
Full-Time Admin users are required to be at least 16 or over before access to the Full-Time system can be granted. The system will display an error message if a user has been created with either no date of birth or if they are under 16, which means these users will not be able to be sent a login invite to set up their login details.



1.2 How to… Set Date of Birth for Existing Admin Users

With leagues having so many existing users without a date of birth set, we have provided functionality so that existing users can set their own date of birth on login, rather than the burden lying with the league having to add them for all users. This will only apply for existing logins. Without providing a date of birth, a user will not be able to login to Full-Time.

Once the date of birth has been provided, this will be saved and will not need to be provided again.



1.3 How to… Set Logins for any existing users under 16s

A small number of existing users of Full-Time whose date of birth is under 16 will automatically have their login deleted. If the league needs to re-instate the access for these individuals (assuming they are actually aged 16 or over) they will need to provide the correct date of birth, and generate a new login invite for the individual concerned.

2.0 Restricting Changes to Access Roles

Previously, Full-Time has provided a high amount of complexity in allowing users to modify existing roles to have access to areas of functionality they would not normally have access to (e.g. a fixture secretary could be given access to create players). These have now been significantly simplified which may mean that some leagues will need to add additional roles to some individuals' profiles.

Remember that the League Administrator role continues to have access to the full range of functionality for Full-Time.

The table below shows the new restrictions, where a role is marked with an x an individual with that role will not be able to be given additional permissions to access that functionality. Note that this does not mean the role concerned has access to this functionality.

	Division Administrator	Fixture Secretary	League Administrator	News Secretary	Referee Secretary	Registration Secretary	Team Administrator
Ability to approve players & assign teams to people without roles.				X		X	
Access fixture, statistic and table downloads				X		X	
Access Person downloads		X		X	X	X	X
Access Referee downloads				X		X	X
Approve entered results and statistics to appear on the division tables.							
Assign Referees to fixtures.							
Create match reports for teams within their domain.							
Create and maintain within their domain e.g. a team or a division.							
Create players via spreadsheet upload							
Create points adjustments to the division tables.							
Create the league structure - seasons, divisions, teams, venues, etc	X	X		X	X	X	X
Enter referee marks for fixtures involving teams within their domain.							
Enter results for teams within their domain.							
Enter statistics for teams within their domain.							
Fixtures - ability to see hidden fixtures within the admin pages							
Maintain contact messages within their domain e.g. a team.							
Maintain people who have age conflicts.							
Maintain player suspension within their domain							
Merge players within their domain				X		X	
People - Create and edit people within domain, ability to create new people for allowable roles within their domain e.g. a team or a division.							
People - Edit People (this excludes the ability to create people).				X		X	
Send Emails to the email group lists.							
Send emails to the league email subscribers list.							
Setup and change the structure of competitions.							
Setup new and change SMS Team Administrators.							
The ability to approve and unapproved match reports							
The creation of new fixtures and the ability to change and delete existing fixtures for all fixture groups.							

3.0 Functionality Removed from Full-Time

As part of the review of GDPR, the following areas of functionality have been removed from Full-Time.

3.1 Individuals – removal of un-necessary personal data

One of the requirements of GDPR is that leagues should only store personal information which is necessary for the purposes of registration. Consequently the following fields have been removed from the individual page in Full-Time.

- Disability fields
- Email subscription fields
- Nationality (this may still be stored in Whole Game System)#
- Under Contract (this is stored by FA Registrations)
- International Clearance (this is stored by FA Registrations)
- FAMOA (this is no longer used).

3.2 Contact Us – Messages forwarded as emails

Full-Time has previously contained functionality whereby when a "Contact Us" message was left for the league, a copy of this message would be automatically emailed to selected users. As these messages may contain sensitive information about individuals, the functionality to have the message emailed has been removed. Leagues will still be able to receive messages, but will only be able to access them by logging into Full-Time.

We are aware that this change to functionality will add a need for leagues to check their contact messages by logging into Full-Time, but the requirements of GDPR are such that a message has to be viewed via a secure login, which is not satisfied if it is automatically copied to an email.

3.3 Email Subscription Functionality Removed

The functionality to allow individuals to provide their email address to leagues via the Email Subscription link has been removed. Very few leagues used this, but to do so the league would need to provide details of the purpose for which they would be collecting this information.

3.4 Player Self-Registration Functionality Removed

A rarely used piece of functionality allowed a league to configure an option whereby players could register themselves directly for teams, without any approval or management by the club or league. This has been removed.

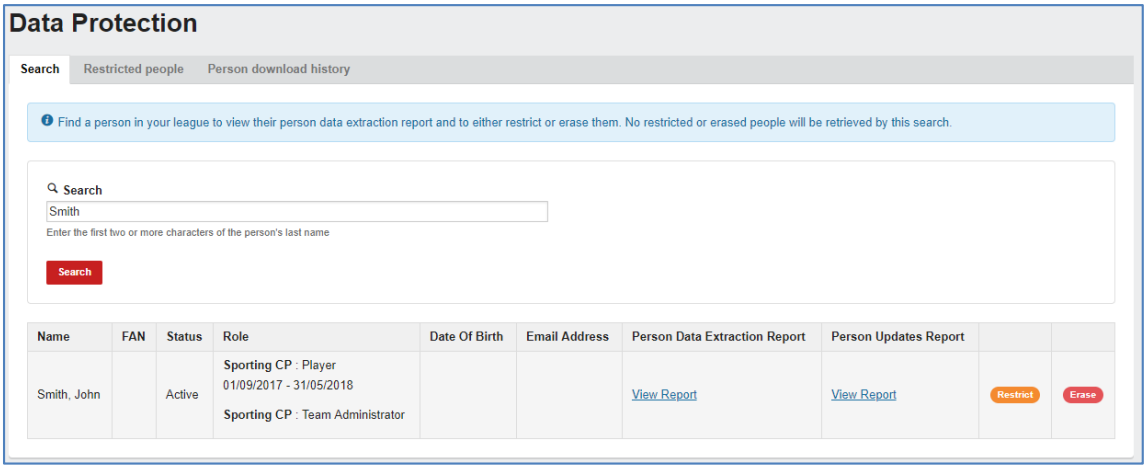
4.0 Data Protection

A new section has been provided in Full-Time, under the People Wizard, to allow leagues to deal with Subject Access Requests, Erasure Requests and Restriction Requests. All of these are only available to the League Administrator role.

4.1 How to.. Extract Data for Subject Access Requests

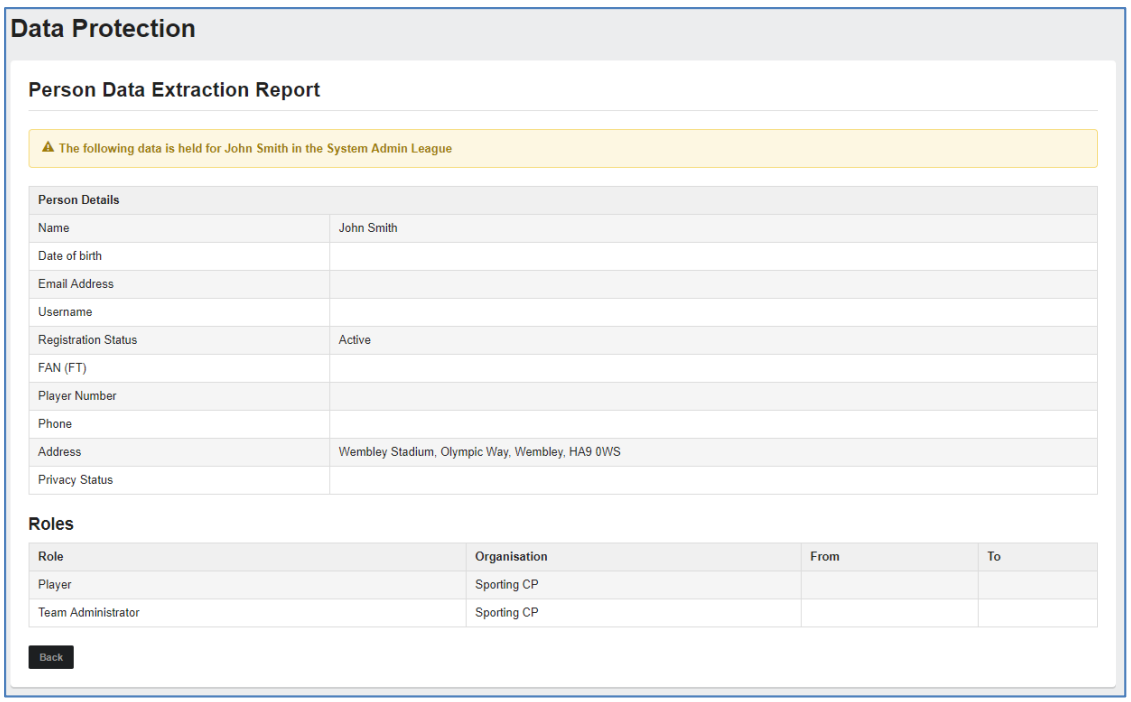
Individuals have the right to request all the data/information held for them without a cost and must be provided to them on a machine readable format within 30 days from initial request. A new feature has been implemented to enable Leagues fulfil individual subject access requests.

To access the functionality for Subject Access Requests, navigate to People Wizard and select the Data Protection option.

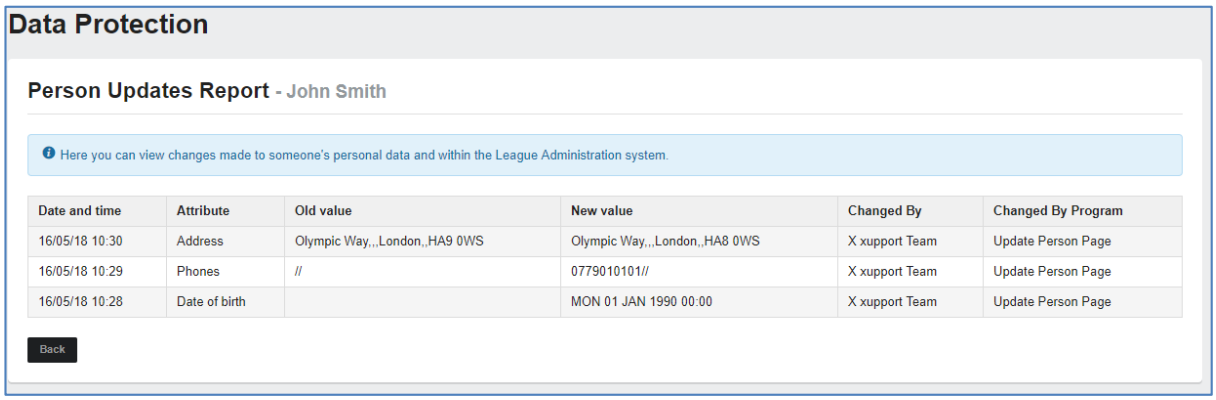


Once the individual has been found, you have two options for either extracting their data, or simply checking for any updates to their information.

The Person Data Extraction Report contains all of the personal data that is held on the system for that individual, including their roles and any refereeing appointments and can be printed if required.



The Person Update Report allows you to view any updates to the individual's record, including whether the Person Data Extraction Report has been run for that individual, any updates to their personal details and when they accepted the Terms and Conditions.



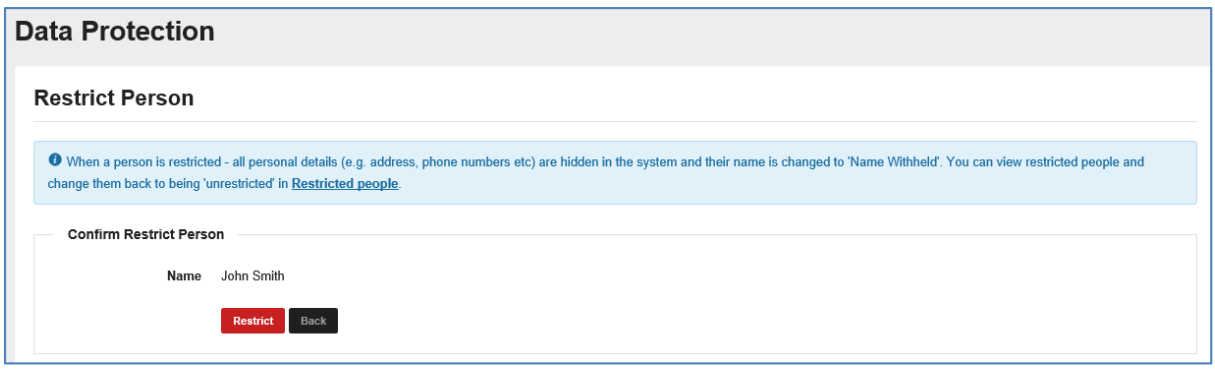
4.2 How to.. Restrict an Individual's Data from Further Processing

One of an individual's rights under GDPR is to request that their data may be restricted. Once approved such a request has to be fulfilled.

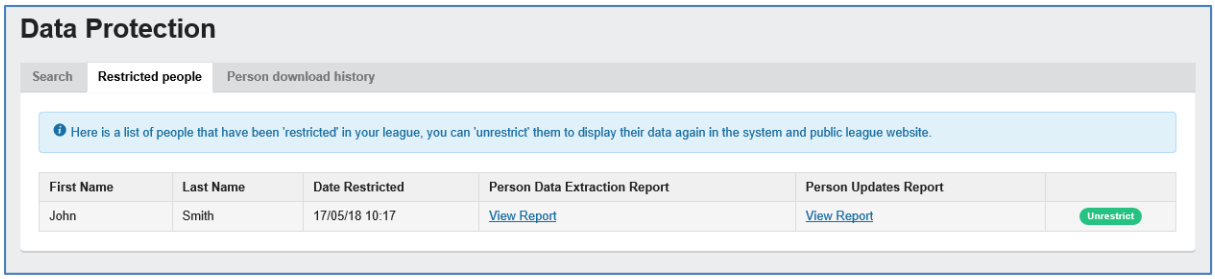
If this is an individual whose recorded is linked to their FAN in Whole Game System, the restriction needs to be applied in Whole Game System by the FA, and this will automatically update Full-Time.

If the individual is not linked to a FAN record, then a league will need to use the Data Protection functionality to restrict an individual's data.

Navigate to the People Wizard and Data Protection section, and search for the individual concerned. Once you have found them, click on the Restrict option.



You will be prompted to confirm this. Once an individual has been restricted they will appear under the "Restricted People" section of the Data Protection section, which includes an option to un-restrict them if this is required at a later date.



An individual who's data has been restricted will be displayed on the public and admin pages as "Name Withheld", and will no longer be shown on any reports. They should not be appointed to any fixtures, or recorded as playing in any matches whilst they are restricted.

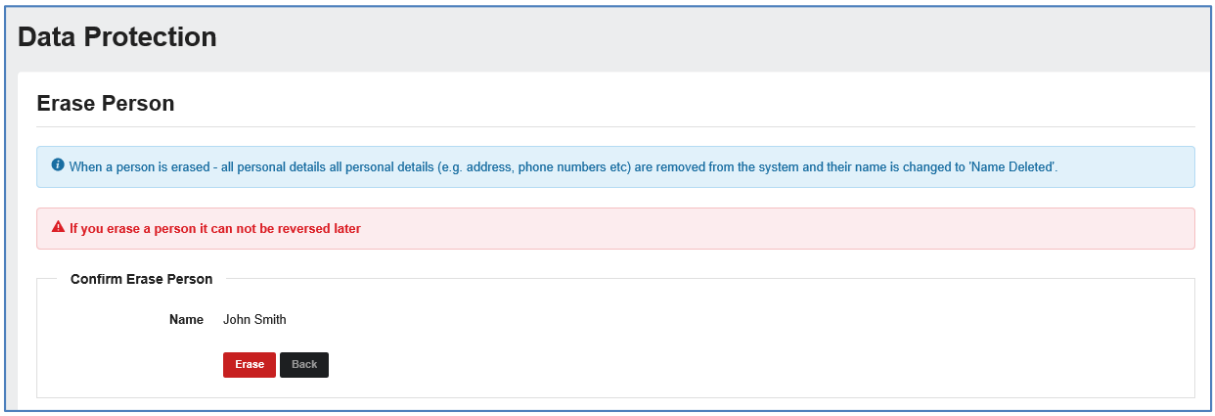
4.3 How to.. Erase an Individual

One of an individual's rights under GDPR is to request that their data may be completely erased. Once approved such a request has to be fulfilled.

If this is an individual whose recorded is linked to their FAN in Whole Game System, the erasure needs to be approved by the FA Legal Team, applied in Whole Game System by the FA, and this will automatically update Full-Time.

If the individual is not linked to a FAN record, then a league will need to use the Data Protection functionality to erase an individual's data but this should **ONLY** be used if the league has received and approved an erasure request from the individual concerned.

Navigate to the People Wizard and Data Protection section, and search for the individual concerned. Once you have found them, click on the Erase option.



Once erased, an individual's personal details will be removed from the system, and their name changed to Name Deleted (this will be shown on public pages for any fixtures in which they played or officiated). The erasure process cannot be reversed.