

KIRKLEES SUMMER **CAMP**

PRIVACY AND DATA **PROTECTION POLICY**

Version 2.0

March 2022

Authorised by Fran Whitehead

To be reviewed: June 2023

Replaces: Version 1.0

LOG OF VERSION CHANGES AND POLICY REVIEWS

Version	Date written	Date of review	Changes made
1.0		March 2022	
2.0	March 2022	June 2023	Introductory paragraph added Format and layout amended

1. Introduction

Kirklees Summer Playscheme Camp (KSPC) understands that privacy and protecting personal information is extremely important. KSPC will not take risks with any information provided.

KSPC follows the 7 principles set out in schedule 1 of the Data Protection Act 2018 with all data that it handles. These principles are:

- Fair and lawful
- Legitimate purposes
- Adequacy
- Accuracy
- Retention
- Rights
- Security
- International

2. General Data Protection Regulation (GDPR)

This policy has been reviewed in the light of the GDPR guidance. KSPC has reviewed the information it holds and how it is stored. This document sets out the personal data held, how it is kept secure, when it is used and when it is deleted. Parents and volunteers have the right to see information held about them or their child. KSPC operates under the lawful basis as set out in the GDPR guidance, in particular the lawful basis of consent and contract.

3. Context

- KSPC is a small organisation which provides holidays under canvas for children aged 9 -12, and it is run by volunteers.
- KSPC needs to hold personal information in order to take bookings and support children and volunteers while they are at the camp site.

- KSPC holds personal information on children and contact information on their parents and carers, this includes emails, phone numbers and health, support and dietary needs. This information is provided electronically and in paper form. The information is used regularly while the children are at Camp.
- KSPC also holds personal information on volunteers and Duke of Edinburgh volunteers (DoE). Information is not held on bank account details.
- All volunteers involved in handling personal information receive guidance on their data protection responsibilities and the way that we keep information secure.
- The volunteers most directly affected are the Camp Leadership Team and, where appropriate, volunteers involved with First Aid. Other volunteers may handle information when involved with collecting and dropping off children or taking children home.
- Group leaders may also access information if it is necessary to provide appropriate support to the child. They will only have access to information if it is deemed appropriate and they will be briefed before information is released.

4. Information Held

Electronic

1. The child's booking form which is completed when a place is booked.
2. Lists of children for each camp and bus lists which contain parents' names and the names and phone numbers of those dropping off or picking up children. These are also held as a paper copy.
3. Details of special educational needs and health problems. These are accessed by the Camp Leadership Team.
4. Tuck shop lists which contain the child's name.
5. DoE and young leader permission forms.
6. DBS checks through the UCheck website
7. Volunteer personal details including DBS checks and training records.
8. The Camp Log Book of serious incidents during the summer.

Paper

1. Lists of children for each camp and bus lists which contain parents' names and the names and phone numbers of those dropping off or picking up children.
2. Tuck shop list of children's names and spending.
3. Details of special educational needs and health problems when access is needed frequently.

4. Print outs of booking forms where there is information on a child that is referred to regularly or for emergency health care.
5. Individual medical sheets provided by parents and carers and individual medical notes completed by the First Aider.

5. Procedures to Protect Information

1. Booking takes place through an App which directs people to Paypal for payment. KSPC does not have access to or hold bank details.
2. Information is held on 2 KSPC laptops and 3 ipads with access to a shared drive. The shared drive is password protected and shared with the Leadership Team where appropriate.
3. The Leadership team have their own password protected email account for Camp business
4. The Leadership Team have access to the Camp phone which is password protected.
5. The camp laptops and ipads are password protected.
6. Passwords will be changed at the end of each summer so that people stepping down from roles do not continue to have access.
7. The Leadership Team may access the shared drive through their personal IT equipment under the following conditions:
 - If possible, through equipment that is provided by their employer to ensure stronger protection.
 - The password should be used each time and not saved to the device.
 - The device should be password protected and no-one else should have access to the device.
8. The members of the Leadership Team with permission to access personal information should use the camp laptops or ipads. They should ensure that:-
 - They access, use and share information with the permission of the camp leader and follow this guidance as well as the Safeguarding Policy and information sharing protocols;
 - Information should not be shared with other agencies or KSPC volunteers unless it is in line with the policy above.
 - Emails about children should not use names or distinguishing characteristics.
 - All information with personal data should be kept password protected or, if a paper copy, in a secure location.
 - Paper copies should be shredded when no longer needed.
9. When completing the booking, parents and carers and volunteers will be asked to give permission for the information to be used for the booking, while at the camp site and after the summer to allow contact about future KSPC activity. This is covered by the lawful basis of consent and contract.
10. Information about individual children is shared with their group leaders as appropriate and in confidence where the child's needs require this.
11. Information is not shared with outside agencies or organisations unless there is a safeguarding issue. In line with information sharing protocols consent will be obtained wherever possible, unless this creates a risk for the child.

12. Electronic records, paper forms and lists will be destroyed in the March following the previous summer. Except for the electronic Log Book and medical notes which are kept for 5 years and then destroyed.
13. Parents can request to see the personal information KSPC hold on their child.
14. Volunteers can request to see their own personal information which is held by KSPC.
15. In the event of data breach, the parents and volunteers will be informed. A review of the data breach will take place to protect against future data breaches.