



Woodlarks Camp Site Trust

Data Protection Policy 2023

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1 Introduction

The 2023 version of the Data Protection Policy has three changes from the 2019 policy.

It has been written in response to the Guide to the General Data Protection Regulation (GDPR) and to take into account the Data Protection Bill. There is further information on the Information Commissioner's Office website, <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/> . Information on legislation can be found in the [National Archives](#).

The WCST policy is intended:

- to comply with the law
- to ensure we are following good practice
- to protect campers, staff and volunteers
- to protect the organisation

WCST will ensure that data is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

WCST is committed to:

- complying with both the law and good practice
- respecting individuals' rights
- being open and honest with individuals whose data is held
- providing training and support for staff who handle personal data, so that they can act appropriately, confidently and consistently
- notifying the Information Commissioner voluntarily of any violations of privacy

The risks identified are:

- information about individuals getting into the wrong hands, through poor security or inappropriate disclosure of information
- individuals being harmed through data being inaccurate or insufficient.

The guide was updated by Malcolm Jarrett.

2 Changes in the 2023 Version

The following changes have been made to the 2019 version of the Policy.

- Friends of Woodlarks no longer exists.
- A note has been added to the effect that we keep minutes indefinitely.

3 Responsibilities

Overall responsibility for Data Protection lies with the Trustee responsible for Administration and Regulatory Compliance, currently [Malcolm Jarrett](#).

The Trustee's responsibilities include:

- Briefing the Committee and Trustees on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff and volunteers on Data Protection issues
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data

Responsibility for specific items is outlined in the section "Data Protection Issues".

4 Data Protection Issues

WCST is no longer exempt from registration with the Data Protection Registrar as we have CCTV.

4.1 Photographs

We obtain written consent for photographs used on our website or in social media or publicity material. We encourage Camp Leaders to ask their campers to give consent for their photographs to be used.

4.2 Campers' Addresses

Historically we have not kept data on campers, except for numbers of disabled users to show sponsors how many disabled users we have. However, a recent police investigation showed that we ought to be able to demonstrate who has used our facilities.

Whilst all accidents should be noted in the Accident Book it is conceivable that a problem such as asbestosis, not noteworthy at the time, might emerge later.

Finally, we need a list of names to allow Sarah, our Secretary, to issue an accurate invoice to each camp.

We still ask for a count of people with disability and able-bodied visitors. Statistics are then used to show donors and potential donors how many people use the site. We do not require a list of individual abilities.

To allow these issues to be addressed we will ask Camp Leaders to provide the following information about every camper.

- Given name(s)
- Family name
- Date of Birth
- Disability status

We need Date of Birth to determine who was a minor and to differentiate between people who share names. This data will be stored indefinitely.

4.3 Mailing List

A consent form (see page 7) is circulated with the Year Book allowing Sarah to keep the postal and email addresses of volunteers, campers and supporters. Donors' records are kept for two years.

This allows WCST to circulate the Year Book and to send occasional updates about our activities.

Anyone wishing to opt out from the mailing list should contact Sarah.

Sarah manages the mailing list, keeping it electronically with password protection.

4.4 Disclosure and Barring Service (DBS checks)

We have a Disclosure and Barring Policy. It also offers a service to help volunteers get a DBS check.

We don't monitor the DBS checks of volunteers at camps. This is the responsibility of Camp Leaders. We do expect Camp Leaders to show their DBS status.

We stipulate that Trustees and members of its Management Committee have DBS checks.

Consequently, WCST will hold DBS data on all its Trustees and Management Committee members and on some volunteers, who are regularly on site for Trust business.

As it is illegal for a DBS Administrator to obtain a DBS for themselves, we have offered to get some Camp Leaders/administrators checked.

DBS records are kept electronically by our supplier (currently Disclosure Services) accessible online to Sarah and DBS administrator using a logon and password.

Sarah and the DBS administrator manage the security of DBS data.

4.5 Emergency details of those working for WCST

WCST understands that some volunteers may have medical problems. Any volunteer wishing to lodge information with WCST for release to medical practitioners in an emergency may deposit information in a sealed envelope with Sarah. Information will be held under lock and key.

4.6 Minutes

WCST keeps formal minutes of all meetings. This includes Management Committee, Trustee and Annual General meetings. Minutes are edited by Sarah and others then distributed electronically to Management Committee members and Trustees as relevant. The Chair of Trustees keeps a signed copy indefinitely.

4.7 Financial Information

The Trust holds banking details for individuals who have required a payment from WCST for expenses or authorised purchases, etc. This is held within our online banking system, secured by password and login authentication. Details are only viewable by the Honorary Treasurer and account signatories. Bank account details for individuals and businesses are reviewed at the end of each financial year. Any information unused during the previous 12 months being deleted.

We keep financial records in paper form and online. Paper records are held under lock and key with access controlled by Sarah and Dave Gill (Hon. Treasurer).

Paper records will be destroyed after seven years, online records will be managed by the Honorary Treasurer.

4.8 Closed Circuit Television (CCTV)

The Trust uses CCTV to deter theft. Images are recorded for a period of 14 days and will only be viewed if the Trust believes a crime has been committed.

4.9 Government requirements

The coronavirus pandemic showed that we may have to change these requirements at short notice to conform to Government requirements. We will keep users informed of any changes should they occur.

4.10 Ring Doorbell (Kathleen Marshall House)

The doorbell on Kathleen Marshall House stores video and audio information for six months.

4.11 Broadband Connections

Our broadband equipment may have the ability to log data about user connections. We will only use connection information for problem solving purposes.

5 People with Roles in Data Protection.

Trustee Responsible: Malcolm Jarrett

Secretary: Sarah Lane secretary@woodlarks.org.uk

DBS Administrators: Sarah Lane and Brian Drew secretary@woodlarks.org.uk

6 Example Forms

6.1 Mailing List Form

A form like that shown below is sent out to with The WCST Year Book.



Woodlarks Camp Site

REGULAR DONATIONS to WOODLARKS (Regd. Charity 306148)

If you would like to become regular supporter of Woodlarks Camp Site, please set up a regular standing order using the below account details. We can claim gift aid on your donations.

Account name: **Woodlarks Camp Site Trust**
 Sort code **30.93.20**
 Account No. **00352288**
 Reference: **[your name]**

If you prefer to send a cheque payable to: **Woodlarks Camp Site Trust**, please send by post to:
The Secretary, Kathleen Marshall House, Tilford Road, Farnham, Surrey, GU10 3RN

DECLARATION (Tick all boxes that apply)

- Please add me to the mailing list for future Yearbooks for as long as I make donations.
- Please send my Yearbooks by email only.
- Please claim Gift Aid on all my donations.
- I am a UK Taxpayer, this is my money and I am not receiving anything for my donation.
- I am happy for Woodlarks to keep my personal information on file for contact purposes.

(Woodlarks keeps your personal data secure and will never pass to third parties.)

Full Name: []
 Address: [] Postcode: []
 Email: [] Date: []

Please scan and email this form to: secretary@woodlarks.org.uk (or post it to the above address)



Woodlarks Camp Site

REGULAR DONATIONS to WOODLARKS (Regd. Charity 306148)

If you would like to become regular supporter of Woodlarks Camp Site, please set up a regular standing order using the below account details. We can claim gift aid on your donations.

Account name: **Woodlarks Camp Site Trust**
 Sort code **30.93.20**
 Account No. **00352288**
 Reference: **[your name]**

If you prefer to send a cheque payable to: **Woodlarks Camp Site Trust**, please send by post to:
The Secretary, Kathleen Marshall House, Tilford Road, Farnham, Surrey, GU10 3RN

DECLARATION (Tick all boxes that apply)

- Please add me to the mailing list for future Yearbooks for as long as I make donations.
- Please send my Yearbooks by email only.
- Please claim Gift Aid on all my donations.
- I am a UK Taxpayer, this is my money and I am not receiving anything for my donation.
- I am happy for Woodlarks to keep my personal information on file for contact purposes.

(Woodlarks keeps your personal data secure and will never pass to third parties.)

Full Name: []
 Address: [] Postcode: []
 Email: [] Date: []

Please scan and email this form to: secretary@woodlarks.org.uk (or post it to the above address)

This policy will be reviewed after three years, or sooner if legislation changes.

Signed:

Date:

Print name: Catherine Crawford

Position held: Chairman

Implemented: March 2023

Review date: March 2026

Person responsible: Malcolm Jarrett