



Woodlarks Campsite CIO

Woodlarks Camp Site Trust

Data Protection Policy

Version Control Log

Version	Date	Summary of Changes / Notes	Author
1.0	March 2023	Previous version Implemented	
1.1	27/11/2025	Content imported into new template	MJ/GTC
1.2	04/03/2026	Updated with comments from SL	MJ/DMG

Document Approval

Version	Date	Person Responsible	Approved by	Signature
1.2	April 2026		All Trustees	Email

Distribution History

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1.2	28/04/2026	Added to Woodlarks Document Library and Website

Review Interval

Version	Date of Next Review	Interval
1.2	28/04/2029	3 years

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1 Introduction

1.1 Definitions

1.1.1 For definitions used in this policy, please refer to the separate document on our [website](#).

1.2 Personnel

1.2.1 For allocated personnel for this policy, please refer to separate document on our [website](#).

1.3 Scope

1.3.1 This policy applies to both organisations as 'Woodlarks'.

- [Woodlarks Campsite CIO - 1214811](#)
- [Woodlarks Camp Site Trust - 306148](#)

1.3.2 This policy applies to:

- Trustees
- The Management Committees
- The Warden and Secretary
- Woodlarks Volunteers, including Working Parties and Winter Events
- Camps, Schools and Winter Events hiring the site

1.3.3 It covers all activities taking place on the campsite, whether residential or day use.

1.4 Guidance

1.4.1 The 2026 version of the Data Protection Policy has four changes from the 2023 policy.

1.4.2 The following changes have been made to the 2023 version of the Policy.

- Retention condition on donors removed.
- Section on camper's addresses removed.
- Words referring to DBS administration service for camp leaders removed.
- Deletion condition for financial information removed.

1.4.3 It has been written in response to the Guide to the General Data Protection Regulation (GDPR) and to consider 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](#).

1.5 Purpose

1.5.1 This policy is intended:

- to comply with the law
- to ensure good practice is followed
- to protect campers, staff and volunteers
- to protect the organisation

1.5.2 Woodlarks 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 UK without adequate protection

1.5.3 Woodlarks 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 data privacy

1.5.4 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.

2 Implementation

2.1 Responsibilities

2.1.1 Overall responsibility for Data Protection lies with the Trustee responsible for Administration and Regulatory Compliance.

2.1.2 The Trustee's responsibilities include:

- Briefing the Management Committees 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 section 11 People with Roles in Data Protection,
- Woodlarks is no longer exempt from registration with the Data Protection Registrar as we have CCTV.

2.2 Photographs

2.2.1 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.

2.3 Mailing List

2.3.1 A consent form (see section Mailing List Form) is circulated with the Yearbook allowing the Secretary to keep the postal addresses of volunteers, campers and supporters.

2.3.2 This allows Woodlarks Campsite to circulate the Yearbook and to send occasional updates about our activities.

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

2.3.4 The Secretary manages the mailing list, keeping it electronically with password protection.

2.3.5 Woodlarks will use commercially available mailing products that have facilities for recipients to elect to be removed from the mailing list.

2.3.6 Disclosure and Barring Service (DBS checks)

2.3.7 We have a [Disclosure and Barring Policy](#). It also offers a service to help volunteers get a DBS check.

2.3.8 Woodlarks will hold DBS data on people as defined by the policy.

2.3.9 DBS records are kept electronically by our supplier (currently Disclosure Services) and by the government DBS update service accessible online to the Secretary and DBS administrator using a logon and password.

2.3.10 The Secretary and the DBS Administrator manage the security of DBS data.

2.4 Emergency details of those working for Woodlarks

2.4.1 Woodlarks understands that some volunteers may have medical problems. Any volunteer may wish to:

- lodge information with Woodlarks for release to medical practitioners in an emergency - this will be in a sealed envelope kept by the Secretary. under lock and key; OR
- carry an up-to-date ICE (In Case of Emergency) card or key fob with them; OR
- ensure that the Health App on their mobile device is active, up to date and has been setup with emergency contact details in the Medical ID section. This can be accessed when their phone is locked and further information [can be found here](#):

2.5 Minutes

- 2.5.1 Woodlarks keeps formal minutes of all meetings. This includes Management Committees, Trustee and Annual General Meetings. Minutes are edited by the Secretary and others then distributed electronically to Management Committees members and Trustees as relevant. The chair of each meeting keeps master copies of Trustee and Management Committees meetings.

2.6 Financial Information

- 2.6.1 The Trust holds banking details for individuals who have required a payment from Woodlarks 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.
- 2.6.2 We keep financial records in paper form and online. Paper records are held under lock and key with access controlled by the Secretary and electronic documentation, including scanned documents, are maintained by the Treasurer in OneDrive folders and SharePoint.
- 2.6.3 Once scanned, most paper records will be filed electronically, as above and deleted after a period of 6 years plus the current year. Any paper records that need to be kept in hard copy will be destroyed after a period of seven years.

2.7 Closed Circuit Television (CCTV)

- 2.7.1 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.

2.8 Government requirements

- 2.8.1 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.

2.9 Ring Doorbell (Kathleen Marshall House)

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

2.10 Broadband Connections

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

3 Review

3.1 Regular Review

- 3.1.1 This policy will be reviewed every 3 years, or sooner if legislation changes or safeguarding incidents occur.
- 3.1.2 Lessons learned will be incorporated into future revisions.