

## DATA PROTECTION & CONFIDENTIALITY POLICY

### Principles

The principles to which Path Hill Outdoors staff and volunteers are expected to work in relation to data protection and client's confidentiality are as follows:

- **Lawfully, fairly & in a transparent manner.**  
Directors have given consideration to this and the data protection policy, the related operational plan, the risk register and the Legitimate Interest Assessment document fulfil this.
- **Collected for specific, explicit and legitimate purposes**  
We use two bases for processing personal data
  1. **Consent:** the individual has given clear consent for Path Hill Outdoors to process their personal data for a specific purpose.
  2. **Legitimate interests:** the processing is necessary for our legitimate interests.
- **Adequate, relevant and limited**  
We will only request data that is required for the stated purpose.
- **Accurate & up-to-date**  
Our data system and all paper records will be kept accurate and up to date.
- **Kept for no longer than necessary**  
The information will be held as long as it is needed for the carrying out of the legitimate interests and will be erased when no longer needed. Guidelines will be followed where specific time periods for keeping data are required and Path Hill Outdoors will review the personal data it holds annually to ensure that information is erased when necessary.
- **Secure**  
Information is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## **Types of Data collected by Path Hill Outdoors**

### **Intervention and School Programmes**

Due to the nature of the work of Path Hill Outdoors and the vulnerabilities of our students we recognise that we handle some very sensitive personal information. Path Hill Outdoors has chosen to use legitimate interests as a lawful basis for processing data on individuals and organisations held on our database or in written records at this time.

We collect data from referrers (local authorities, schools and other statutory organisations), from parents and carers and collate information from Path Hill staff.

It is practice that all Path Hill Outdoors employees, volunteers and contractors must be aware of and respect a student's right to confidentiality. Confidentiality may only be broken when the health, safety or welfare of the young person, or others, would otherwise be at grave risk.

### **Protecting Student's Confidentiality**

- Record student's information accurately.
- Keep student's information physically secure.
- Follow guidance before disclosing any student's information e.g. using established information sharing protocols.
- Ensure that best practice is followed for confidentiality in respect of access to all student's information in any form e.g. paper records, electronic data, emails, faxes, surface mail, conversations which can be overheard or phone calls.
- Anonymise information where possible.

### **Anonymisation**

Data are said to be anonymised when items such as name, address, full postcode, date of birth and any other detail that might identify a student are removed; the data about a student cannot be identified by the recipient of the information; and the theoretical probability of the student's identity being discovered is extremely small. We will always consider anonymisation of data where possible.

This data is reviewed every year and will be deleted within five years.

### **Path Hill Adventures**

We collect information from parents/carers who send their children on holiday activities. The information we collect is on the children's dietary requirements, medical conditions, age, gender, contact details of parents and emergency contact details.

Two weeks after the holiday we shred any paper information and delete emails.

Our computerised booking system will store the above information for as long as the parents/carers deem necessary.

We use an online platform to send out our newsletter and information on future events. The online platform – currently Mail Chimp - is GDPR compliant.

**We do not share any information we collect to any third parties.**

### **Consent**

Consent is sought on an opt-in basis and recorded via emails and our Path Hill Adventures website.

We seek consent from schools, referring agencies and parents/carers to photograph or video their children.

### **Customers Rights**

Under UK data protection law, Customers have certain rights over the personal information that we hold about customers. Here is a summary of the rights that we think apply:

#### **Right of access**

Customers have a right to request access to the personal data that we hold about them and we will provide customers with this unless legal exceptions apply.

If customers want to access their information, please send a description of the information customers want to see and proof of their identity by post to the address provided below.

#### **Right to have customers inaccurate personal information corrected**

Customers have the right to have inaccurate or incomplete information we hold about them corrected. The accuracy of their information is important to us so we're working on ways to make it easier for customers to review and correct the information that we hold about them. In the meantime, if customers change email address, or if customers believe any of the other information we hold is inaccurate or out of date, please contact us via email or post (see below). Alternatively, customers can telephone 0118 9842500

#### **Right to restrict use**

Customers have a right to ask us to restrict the processing of some or all of their personal information if there is a disagreement about its accuracy or we're not lawfully allowed to use it.

#### **Right of erasure**

Customers may ask us to delete some or all of their personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to. In many cases, we will anonymise that information, rather than delete it.

#### **Right for customers personal information to be portable**

If we are processing customers personal information (1) based on their consent, or in order to enter into or carry out a contract with them, and (2) the processing is being



done by automated means, Customers may ask us to provide it to them or another service provider in a machine-readable format.

#### **Right to object**

Customers have the right to object to processing where we are using their personal information (1) based on legitimate interests, (2) for direct marketing or (3) for statistical/research purposes.

If Customers want to exercise any of the above rights, they can contact Path Hill Outdoors

email: [contact@pathhill.com](mailto:contact@pathhill.com) telephone: 0118 9842500 or post: Path Hill Outdoors, Path Hill, Goring Heath, Oxfordshire, RG8 7RE.

We will endeavour to respond fully to all requests within one month of receipt of customers request, however if we are unable to do so we will contact customers with reasons for the delay.

#### **Opting Out**

Customers have a choice about whether or not they wish to receive information from us. If customers do not want to receive direct marketing communications from us about what we do, then they can select their choices by ticking the relevant boxes situated on the form used to collect your information.

We're committed to putting customers in control of their data so they are free to change their marketing preferences (including to tell us that they don't want to be contacted for marketing purposes) at any time by contacting us by email: [contact@pathhill.com](mailto:contact@pathhill.com) telephone: 0118 9842500 or post: Path Hill Outdoors, Path Hill, Goring Heath, Oxfordshire, RG8 7RE.

We will not use Customers personal information for marketing purposes if they have indicated that they do not wish to be contacted and will retain their details on a suppression list to help ensure that we do not continue to contact them.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. More details are published by the UK's Information Commissioner's Office, <https://ico.org.uk/>

Path Hill Outdoors has registered with the **Information Commissioner's Office**  
**Number Z264595**

## **Policy Information**

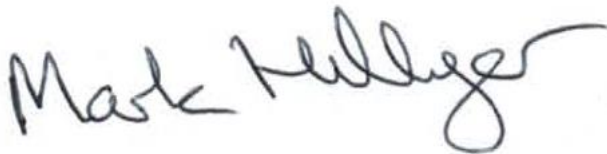
Path Hill Outdoors seeks to put in place measures which ensure that we act fairly and lawfully in relation to data protection. Responsibility for ensuring that Path Hill Outdoors has an appropriate policy that is implemented and is compliant with the General Data Protection Regulation (GDPR) lies with the Directors of Path Hill Outdoors.

This Policy will be reviewed every two years

**This Policy has been prepared by Mark Hillyer – Director at Path Hill Outdoors**

**Approved 20<sup>th</sup> September 2021**

**Next review September 2023**

A handwritten signature in black ink that reads "Mark Hillyer". The signature is written in a cursive, flowing style.