



## Forest School Camps Data Privacy Notice

### Policy Information

Forest School Camps (FSC) / Data Protection Lead	<i>Dan Hall and Liz Kaye</i>
Scope of the policy	This policy applies to all staff, parents and children engaging with FSC
Policy written by	<i>Katy Bevan May 2018 update by Dan Hall Dec 2024</i>
Policy approval date	9 Dec 2024
Policy review date	<i>Dec 2027 (Recommended every three years)</i>

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your engagement with us. It also details how we comply with UK data protection law and your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice applies to you if you are::

1. An individual who has registered interest in participating in FSC;
2. A member of staff, Associate; or
3. A parent or guardian enrolling children in camp or finding out ways to get involved further with FSC; or
4. A child enrolled with parental consent.

References to **we**, **our** or **us** in this privacy notice are to the **Forest School Camps (FSC)**

- Registered as a charity and company limited by guarantee Charity number 306006 Company Number 937722
- Registered office: Hill Row Causeway, Haddenham, Ely, CB6 3PA

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Lead has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

### 1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you sign up for membership with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- **Contact Details:** Name, title, email address, telephone number.
- **Personal Details:** Date of birth, gender, and membership start and end dates.
- **Records:** Interactions with FSC, attendance at any camp and official events, and financial transactions.
- **IT Information:** Usage of our online portal, IP address, and login details.
- **Special Category Data:** Health information, dietary requirements, and race or ethnicity (processed under Article 9 of the UK GDPR).

If you have registered your interest in FSC, you may also provide us with, or we may obtain the following additional **personal information** from you:

- identification documents such as passport and identity cards;
- details of next of kin, family members and emergency contacts;
- staffing records and reports;
- any disciplinary and grievance information;
- dietary requirements

## 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, mental health conditions, behavioral issues, medical records and health professional information

In relation to the special category personal data that we do process we do so under lawful bases including substantial public interest, legitimate interest or explicit consent. Criminal records data is processed only when legally required or with explicit consent, such as for safeguarding purposes..

## 3. HOW WE COLLECT YOUR INFORMATION

We collect personal data:

- Directly from you during registration or correspondence.
- From parents/guardians for children’s participation.
- From your interactions with our online systems or at events

If you provide us with information about others (e.g., emergency contacts), you must ensure they are aware of how their data is being used and share this notice with them if appropriate. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

## 4. USES MADE OF THE INFORMATION

We process personal data, including special category data, differently depending on your relationship with FSC. Below is a detailed breakdown:

---

### For Members

Purpose	Data Used	Legal Basis
Administer your membership account	Contact details, membership data	Performance of contract
Send information about camps and events	Contact details	Performance of contract

Respond to queries or complaints	Contact details, interaction records	Legitimate interest
Retain records for legal or regulatory purposes	All personal data collected, including special category data (e.g., health or grievance information)	Legal obligation or legitimate interest
Conduct data analytics to understand attendance and trends	Attendance data	Legitimate interest
Promote events through photos/videos	Images	Explicit consent
Promoting the charity's work and seeking funding from individuals	Contact details, membership data	Legitimate interest
Arrange payment and financial transactions	Contact details, payment information, bank details	Performance of contract

### For Staff (including Associates)

Purpose	Data Used	Legal Basis
Manage your participation at camps	Contact details, qualifications camp history, staff reports, medical information	Performance of contract or Legitimate interest
Conduct performance reviews	Attendance data, qualifications,	Performance of contract/ or Legitimate interest
Ensure safeguarding compliance	Criminal records history, references, staff reports	Legal obligation or legitimate interest
Provide training and development opportunities	Performance, attendance data, health information	Legitimate interest
Retain records for grievance or disciplinary purposes	Disciplinary and grievance data, including health-related matters	Legitimate interest
Ensure equality and diversity monitoring	Race or ethnicity, health, disability status	Substantial public interest
Promoting the charity's work and seeking funding from individuals	Contact details, membership data	Legitimate interest
Arrange payment and financial transactions	Contact details, payment information, bank details	Performance of contract

### For Campers

Purpose	Data Used	Legal Basis
Administer and monitor attendance	Attendance data, health information, camper notes	Performance of contract
Ensure health and safety	Medical data, emergency contacts, camper notes	Legal obligation

Make travel or accommodation arrangements	Contact details, next of kin, health information	Performance of contract
Record behavior and development progress	Attendance data, performance records, health and behavioral information, camper notes	Legitimate interest
Provide tailored support or accommodations	Health, medical information, disability data	Explicit consent, substantial public interest

### For Parents/Guardians

Purpose	Data Used	Legal Basis
Administer child's participation at camps	Contact details, emergency contacts, Child's health, medical information, dietary requirements	Performance of contract Legitimate interest
Communicate about your child's welfare	Contact details, attendance records, health data, camper notes	Legitimate interest
Arrange payment and financial transactions	Contact details, payment information	Performance of contract
Ensure compliance with health and safety regulations	Emergency contacts, health data	Legal obligation
Support tailored care and accommodations	Child's health, medical information, dietary requirements	Explicit consent
Promoting the charity's work and seeking funding from individuals	Contact details, membership data, bank details	Legitimate interest

### For Suppliers (including land owners)

Purpose	Data Used	Legal Basis
Supplier identification	Contact details, contract details	Performance of contract
Arrange payment and financial transactions	Contact details, payment information	Performance of contract
Location information	Location of land, historical use of land	Performance of contract
Promoting the charity's work and seeking funding from individuals, charities, trustees or companies.	Contact details, bank details	Legitimate interest

For some of your personal information you will have a legal, contractual or other requirement or

obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 5. DIRECT MARKETING

We will not disclose your information to third parties for marketing purposes.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Approved by you:** Any party approved by you.
- **Service providers** (e.g., IT hosting or payment processors) under a Data Sharing Agreement (DSA)
- **Our Commercial Partners:** for the purposes of providing payment facilities, such as Parent Pay, CAF Bank;
- **The Government or our regulators:** where we are required to do so by law.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

## 7. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR.

We retain data only as long as necessary for the purpose for which it was collected. The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements.

Generally, where there is no legal requirement we retain all physical and electronic records for a period of 5 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.
- Some information about children will be retained until they are 21 years old in line with legal and safeguarding guidelines.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You may be able to update some of the personal information we hold about you through our website/Staff Cuppa section. Alternatively, you can contact us using by using the details set out in the "Contacting us" section below.

## **8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- o the right to be informed about how your data is used;
- o the right to access the personal data we hold about you;
- o the right to request the correction of inaccurate I data we hold about you;
- o the right to request the erasure of your data in certain limited circumstances;
- o the right to restrict processing of your personal information where certain requirements are met;
- o the right to object to the processing of your personal information;
- o the right to request that we transfer elements of your data either to you or another service provider; and
- o the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## **9. DATA BREACH NOTIFICATION**

In the event of a data breach, we will:

- Notify the ICO within 72 hours if required.
- Inform affected individuals promptly if the breach poses a high risk to their rights.

All suspected breaches must be reported immediately to the DPOs.

## **10. CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where

required by law we will seek your consent to changes in the way we use your personal information.

## **11. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [gdpr-officer@fsc.org.uk](mailto:gdpr-officer@fsc.org.uk) or write to our Registered office: Hill Row Causeway, Haddenham, Ely, CB6 3PA

**Version dated 9 Dec 2024**

**Published date 13 Jan 2025**