

Hants and Dorset Christian Youth Camps – Privacy Notice for Leaders

1. What is the purpose of this document?

Hants and Dorset Christian Youth Camps (“H&DCYC” or “we”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all Leaders on the Explorer, Discovery and Inheritance camps.

H&DCYC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to prospective, current and former leaders. It does not form part of any contract between us and you and it may be updated at any time.

It is important that you read this notice so that you are aware of how and why we are using such information.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants (and information about your dependants if they are going to be with you on camp)

- Next of kin and emergency contact information.
- Relevant qualifications (e.g. first aid, life-guarding, catering).
- References and other information included as part of the application process
- Photographs (although we won't use your photograph unless we have your consent (or, if you're under 18, your parent/guardian's consent); we will ask you to renew your consent periodically).

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your religious beliefs.
- Information about your health, including any allergies, medical conditions, disabilities, health and sickness records.
- Information about criminal convictions and offences.

4. How is your personal information collected?

We collect personal information about you through the application form you fill out and send to us and through the personal references given by the person nominated by you on your application form. We may collect further personal information about you at camp e.g. information on a medical form – this would be collected from you directly.

5. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

6. Situations in which we will use your personal information

We need all the categories of information in the list above (see paragraph 3) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your appointment.
- Assessing qualifications for a particular job or task.
- Administering the contract we have entered into with you (e.g. arranging leaders' role and responsibilities and arranging activities (before and during camp) and providing for you at camp (both on site and off site)) and/or taking steps preparatory to entering into a contract with you (e.g. processing your application form)

- To keep you updated about camp and/or to invite you back to serve at camp in future years.
- Complying with any relevant health and safety obligations.
- Complying with our legal obligations (e.g. re DBS checks and safeguarding).
- Dealing with legal disputes involving you.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

7. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contractual obligations we owe to you and/or we may not be able to let you serve as a leader. If we are unable to look after you properly or ensure compliance with our legal obligations and the obligations we owe to the campers, without the requested information, we may have to reject your application for camp or may have to send you home from camp.

8. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our safeguarding policy.
3. Where it is needed on health grounds, subject to appropriate confidentiality safeguards.
4. In the course of our legitimate activities (with appropriate safeguards) as a not-for-profit body with religious aims.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about leaders or former leaders in the course of legitimate business activities with the appropriate safeguards.

Our obligations as a data processor

We will use information about your physical or mental health, or disability status, to ensure your health and safety at camp and to assess your fitness to remain at camp and take part in planned activities, and to provide appropriate adjustments. We will use information about your religious beliefs in the course of our legitimate activities (running Christian holiday camps for children and young people). We will not disclose information about your religious beliefs outside of H&DCYC without your consent.

Do we need your consent?

We do not need your consent if we use special categories of your personal information to carry out our legal obligations or in the course of our legitimate activities as a not for profit organisation with religious aims. Unless we were doing so to comply with our legal obligations (e.g. re safeguarding), we would need your consent before we shared your special categories of personal information with anyone outside of H&DCYC. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of you volunteering with us that you agree to any request for consent from us.

10. Automated decision-making

We do not intend to take any decisions about you using automated means. We will notify you in writing if this position changes.

11. Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our child protection policy and our safeguarding policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will hold information about criminal convictions (through voluntary disclosure and through a DBS check). We will use this information to determine whether your application should be accepted and to ensure compliance with our legal and safeguarding obligations and our own child protection and safeguarding policies.

12. Data sharing

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer our contractual relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including external activity providers).

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information. We only permit them to process your personal data for specified purposes and in accordance with our instructions, not for their own purposes.

What about other third parties?

In some circumstances, we may need to share your personal information with health professionals or safeguarding professionals, with a regulator or to otherwise comply with the law.

13. Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those acting on behalf of camp, leaders and other third parties who have a need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and including to enable us to defend any claims. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a leader we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

14. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Trustees in writing (trustees@hdcyc.org.uk).

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

15. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Trustees. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

16. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Trustees of H&DCYC (trustees@hdcyc.org.uk).