



Woodlarks Camp Site Trust

Data Protection Policy 2019

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1 Introduction

The 2019 is an update of the 2018 policy, incorporating changes needed after a year's experience with the original policy. It has been written in response to the Guide to the General Data Protection Regulation (GDPR) and to take into account the new 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 risk 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 2019 Version

Since we wrote the 2018 version of the guide, we have discovered the following needs

- To record data for police investigations
- To record data for insurance purposes
- To record data for invoicing purposes

These changes are outlined in the section on campers' addresses.

We have adopted an online accounting package (Xero), so we have additional responsibilities for this data.

3 Responsibilities

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

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 exempt from registration with the Data Protection Registrar.

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 to issue an accurate invoice to each camp.

To allow these three 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

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.

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.

4.3 Mailing List

A consent form (see page 7) is circulated with the Year Book allowing the Secretary 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.

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

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

4.4 Disclosure and Barring Service (DBS checks)

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

WCST does not monitor the DBS checks of volunteers at camps, which is the responsibility of Camp Leaders.

WCST does 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 doing Trust business. Since it is illegal for a DBS Administrator to obtain a DBS for themselves, we have offered to get some camp leaders/administrators checked. Paper records are held under lock and key in Kathleen Marshall House. Electronic data will be held by our supplier (currently Disclosure Services) accessible online to the Secretary and DBS administrator using a logon and password.

Records will be kept and updated periodically whilst candidates are still active in WCST. After a candidate ceases to be active in WCST for a year records will be destroyed. Paper records are normally burnt under supervision of a Management Committee member. Computer records will be erased.

The Secretary and 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 the Secretary. Information will be held under lock and key.

4.6 Friends of Woodlarks (FoW)

The Management Committee member responsible for FOW keeps a list of donors who wish to stay on the FOW Year Book mailing list. The consent form distributed with the Year Book may be seen on page 7

4.7 Minutes

WCST keeps formal minutes of all meetings. This includes Management Committee, Trustee and Annual General meetings. Minutes are edited by the Secretary and distributed electronically to Management Committee members and Trustees as relevant.

4.8 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 weeded at the end of each financial year, with 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 the Secretary (Sarah Lane) and Dave Gill.

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

5 People with Roles in Data Protection.

Trustee Responsible: Mark Greenwood. mark_greenwood@btinternet.com

Secretary: Sarah Lane secretary@woodlarks.org.uk

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

Friends of Woodlarks (FoW): Trish Nice tric.nice@btopenworld.com

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 TRUST
FARNHAM, SURREY**

Charity number 306148

DONATIONS

To the Secretary, Kathleen Marshall House,
Woodlarks, Tilford Road, Farnham, Surrey, GU10 3RN

Cheques should be made out to Woodlarks Camp Site Trust. Bank transfers may be made to CAFBANK Ltd, King's Hill, West Malling, Kent, ME19 9TA, for the credit of Woodlarks Camp Site Trust, account no. 00008827. Sort code 40 52 40.

NAMEBLOCK

ADDRESS.....CAPITALS

.....PLEASE

.....

POST CODE.....DATE.....

SIGNATURE.....

**PLEASE INDICATE IF YOU WISH YOUR ADDRESS TO
BE RETAINED ON OUR MAILING LIST.**

MAILING LIST PERMISSION

From 31 May 2018, new legislation requires that to retain your address on our database we must have your permission. If you would like to continue to receive our Year Book, please contact the Secretary Sarah Lane on woodlarks103@btinternet.com .Or send her your permission on this slip at Woodlarks, Kathleen Marshall House, Tilford Rd, Farnham, GU10 3RN.

Please retain my address on the Woodlarks data-base

NAMEBLOCK

ADDRESS.....CAPITALS

.....PLEASE

.....

POST CODE.....DATE.....

SIGNATURE.....

FRIENDS OF WOODLARKS

To Miss P Nice, 7 Perpins Rd, Avery Hill, London SE9 2LF

Enclosed please find £2 annual subscription for Friends of Woodlarks and Year Book. Cheques should be made payable to **Friends of Woodlarks**

NAME.....BLOCK

ADDRESS.....CAPITALS

.....PLEASE

.....

POST CODE.....

Friendly reminder: Friends of Woodlarks is not itself a charity so it does not qualify for Gift Aid. If you would like to Gift Aid your donation, please remember that cheques must be made out to Woodlarks Camp Site Trust.

**PLEASE INDICATE IF YOU WISH YOUR ADDRESS TO BE
RETAINED ON OUR MAILING LIST**

GIFT AID DECLARATION

Before signing below, please read the following instructions. This form has to be signed only once. There is no commitment on your part to make any further gifts in the future. However, should you wish to make regular donations, please arrange for bank transfers to CAFBANK. Woodlarks can reclaim 28p for every £1 you give. **THE ONLY CONDITIONS ARE** You must be paying at least as much Income Tax or Capital Gains Tax as is reclaimed from your charitable donations If you stop paying enough tax, you must let us know

I want all of my money gifts to Woodlarks Camp Site Trust (charity number 306148) after the date below (and up to 6 years before that) to be Gift Aid donations. I am a UK tax payer.

SURNAME.....BLOCK

FIRST NAMES.....CAPITALS

ADDRESS.....PLEASE

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

Signed:

Date:

Print name: Alexine Crawford

Position held: Chairman

Implemented: November 2019

Review date: November 2022

Person responsible: Mark Greenwood