



Elements Outdoor Learning Data Protection Policy

Aim

At Elements Outdoor Learning (Elements), we take the confidentiality of our clients very seriously and aim to ensure that all personal data collected about staff, children, parents, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR), the provisions of the Data Protection Act 2018 (DPA 2018) and in light of the Human Right Act (1998). This policy applies to all personal data (personal information), regardless of whether it is in paper or electronic format. We also aim for all parents and carers to feel that they can share information in the confidence that it will only be used to enhance the welfare of their children.

It is important to note that the GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

Data Protection Principles

The principles say that personal data must be:

- ❖ Processed fairly, lawfully and in a transparent manner.
- ❖ Collected for specified, explicit and legitimate purposes.
- ❖ Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed.
- ❖ Accurate and, where necessary, kept up to date.
- ❖ Kept for no longer than is necessary for the purposes for which it is processed.
- ❖ Processed in a way that ensures appropriate security.

Roles and Responsibilities

- ❖ A designated member of staff, the Data Protection Officer (DPO), will have responsibility for all issues relating to the processing of personal data.

- ❖ It is the responsibility of all staff to ensure that their working practices comply with the Data Protection Principles.
- ❖ Disciplinary action may be taken against any employee who breaches any of the instructions or procedures forming part of this policy.
- ❖ The Data Protection Officer will comply with responsibilities under the GDPR and will deal with subject access requests, requests for rectification and erasure, data security breaches.
- ❖ Complaints about data processing will be dealt with in accordance with the Elements Outdoor Learning Complaints Policy.

Elements staff will:

- ❖ Inform parents when we need to record confidential information beyond the general personal information we keep – for example regarding any injuries, concerns or changes in relation to the child or the family, any discussions with parents on sensitive matters, any records we are obliged to keep regarding action taken in respect of child protection and any contact and correspondence with external agencies in relation to their child.
- ❖ Will discuss children's general progress and wellbeing together in meetings, but more sensitive information is restricted to the Elements owner and is shared with other staff only on a need-to-know basis.
- ❖ Get permission from the Elements owner to take any confidential information home.
- ❖ Transport information from Elements on secure computing devices (i.e. encrypted laptops and encrypted memory sticks).
- ❖ Ensure that any information on USB memory sticks is securely deleted off the device.
- ❖ Ensure that all paper-based information that is taken off premises is kept confidential and secure, ideally in a sealed envelope which indicates a return address if misplaced.
- ❖ Ensure that any confidential documents that are taken home are stored in a locked draw.
- ❖ Ensure that paper-based information and IT equipment are kept safe and close to hand when taken off premises. They will not be left attended. Particular care will be taken in public places.
- ❖ Ensure that paper documentation is transported in the boot of a car (locked) during transit.

- ❖ Report of any loss of paper-based information or portable computer devices immediately to the owner of Elements.
- ❖ Ensure that all postal and e-mail addresses are checked to ensure safe dispatch of information. When sending personal information by post the envelope should clearly state 'Private – Contents for Addressee only'.
- ❖ Ensure that when posting/emailing information that only the specific content required by the recipient is sent.
- ❖ Use pseudonyms and anonymise personal data where possible.

Elements staff will not:

- ❖ Take confidential information to an entertainment or public place such as a pub or cinema, whether held on paper or an electronic device. Any information must be taken to the destination directly and never left unattended during the journey.
- ❖ Unnecessarily copy other parties into e-mail correspondence.
- ❖ E-mail documents to a personal computer.
- ❖ Leave documentation in vehicles overnight.
- ❖ Put confidential documents in non-confidential recycling bins.
- ❖ Print off reports with personal data (e.g. child data) unless absolutely necessary.
- ❖ Use unencrypted memory sticks or unencrypted laptops

This policy was adopted by	Elements Outdoor Learning
On	01/09/2023
Date to be reviewed	01/09/2024
Signed on behalf of the provider	
Name of signatory	Saira Court
Role of signatory	Elements Owner and Leader