

Outdoor Education Service



General Data Protection Regulation May 2018

Outdoor Education Service Policy (under Telford and Wrekin Council's umbrella policy)

OES Personal Data Policy

- 1. Collection:** We will only collect the specific data required and no more. Where personal information is collected it will be on the basis of 'opt in' consent for that data. Whenever we obtain consent we will always state how consent can be removed in the future. Where personal data is being collected a privacy notice will be provided (see below for agreed format).
- 2. Sharing:** Personal data only will be shared with specific staff who need the information to deliver the required Outdoor Education programme as agreed in advance with the person/organisation that made the booking and/or to safeguard the vital interests of all participants and/or staff. For example this will include relevant medical details, food allergies, and behaviour management information. Also next of kin and emergency details.
- 3. Storage and retention:** Personal data will be clearly identified and securely stored. After a course, personal data will be destroyed unless there has been an accident/incident. In such a case Telford and Wrekin Council will retain such records until a young person reaches age 25, or for 7 years following the incident in the case of an adult. All such personal data after a course will be stored securely on the Council's electronic system. Paper copies, once scanned, will be shredded and destroyed. These records will be clearly labelled and dated to enable identification and if they are required to be retrieved at a later date.
- 4. Deletion:** Personal data will be routinely deleted immediately after a course or returned to the visiting staff/owner. Personal data that is stored following an accident/incident will be deleted when the young person reaches the age of 25, or after 7 years in the case of an adult. In the case of employees, any personal data will be destroyed within 3 months of leaving or returned securely to the member of staff on their request.
- 5. Photographic permissions:** The Outdoor Education Service will use the T&WC photographic permissions form. Photos will only be taken on T&WC phones, cameras and devices. All photos will be given to the booking school/organisation or deleted, unless permission has been formally received using the T&WC form.
- 6. Marketing:** Consent for future information and marketing contact will be separately requested with an 'Opt IN' statement, signature and date.
- 7. Educational Visits:** The GDPR compliant software web based system, eVisits, has been purchased and is provided as part of the core Service Level Agreement, this will replace the paper based notification system during the academic year 2018/19. This is an encapsulated system removing the need to post or email Visit notifications based on the Form 16A.

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Visit us:

Arthog Wales: www.telford.gov.uk/aoec/

Arthog Wellington www.telford.gov.uk/outreach/
www.twccommercial.co.uk/educationalvisists

Privacy Statements

Although technically the schools collect personal information, as we print/provide the forms which schools use for medical/dietary/behavioural/emergency contacts and consent for emergency medical treatment we need to add our privacy statement. There will be a bit of editing depending on the booking as if it is an adult we can remove 'your child' and obviously it will be either or Arthog Wales or Outreach or Sky Reach (High Ropes)

Also on occasions we do take bookings direct from parents/customers.

Privacy Statement for Customers:

Telford and Wrekin Council (**Arthog Wales/Arthog Outreach/Sky Reach**) are collecting you/your child's personal data to enable you/your child to benefit from their Outdoor Education Service at **Arthog/Arthog Outreach/Sky Reach High Ropes**, and in the case of an emergency to protect the vital interests of you/your child.

Telford and Wrekin Council will not share any of you/your child's personal data collected with any other external organisation unless required/permitted to do so by law.

For further details please view the Privacy Page on the Council's website; www.telford.gov.uk

Freelance and Instructor Employment and Accreditation Records

T&WC Human Resources do not handle freelance instructor application forms and info, and we are also required by the Adventure Activities Licensing Service to keep copies of certain certificates as evidence of competence and currency. We also hold certain key medical info and next of kin in case of an emergency.

Privacy Statement for Employees:

Telford and Wrekin Council (**Arthog Wales/Arthog Outreach/ Sky Reach**) are collecting your personal data to carry out our obligations under employment law, and in the case of an emergency, to protect your vital interests.

Telford and Wrekin Council will not share any of your personal data collected with any other external organisation unless required/permitted to do so by law.

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Educational Visits

Privacy Statement for Educational Visits:

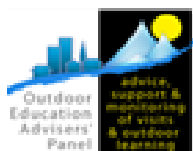
Telford and Wrekin Council Educational Visits Advisory Service are collecting personal data to carry out our obligations as an Employer, principally under the Health and Safety at Work Act, and in the case of an emergency to protect your School/Organisation's staff and children's vital interests.

Telford and Wrekin Council will not share any of the personal data collected with any other external organisation unless required/permitted to do so by law.

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Arthog Wellington www.telford.gov.uk/outreach/

www.twcccommercial.co.uk/educationalvisists

GDPR Checklist:

	Requirement	Explanation
1	Complete an information data flow map	This is a list of the personal data processed in your area. As a minimum it should note what personal data you hold, where it came from, who it is shared with and what we use the data for.
2	Create a record of processing activity	This can be completed from the above exercise. A template is available on the intranet - Template
3	Where you process personal data establish an agreed legal basis for doing this	Review where personal data is being processed and ensure you have a legal reason to do this from those stated in GDPR.
4	Review where and how consent is obtained	Review where you use consent and ensure it complies with GDPR requirements.
5	You have consent systems in place to offer online services directly to children	If you rely on consent to offer online services directly to children then you need to comply with GDPR
6	You have reviewed all privacy notices in place or where identified where they should be in place	Identify where you collect personal data and ensure a privacy notice is in place. Ensure privacy notice complies with GDPR.
7	You have processes in place to ensure data is accurate and/or can be amended if it is not	Check where you hold personal data and ensure it can be amended if necessary
8	You have a retention schedule in place	Ensure you have stated retention periods for your data and that arrangements are in place to ensure deletion occurs.
9	You can respond to a request to restrict processing	Ensure you can stop processing someone's personal data if you are told to do so.
10	You can copy or move personal data from one IT environment to another	Ensure any data held can be transferred where needed in a common machine readable format.
11	You have procedures to handle objection to automated processing of personal data	Ensure you have processes in place where human intervention is needed on previously automated decisions
12	Contract variations have been sent	Review contracts with providers who process personal data on our behalf and ensure contract variation is sent out.
13	Data Protection Impact Assessments (DPIA) are being used	A DPIA is completed for a new system used to process personal data or any major new processing or sharing of personal data.