



FRONTIER CAMPS DATA PROTECTION POLICY

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1. Regulation

The General Data Protection Regulation (EU) 2016/679 (GDPR) sets out the protection of persons with regard to the processing of personal data. The regulation protects the rights and freedoms of individuals and their right to the protection of their data. The regulation is supplemented by the UK Data Protection Bill, which when enacted, will provide additional requirements, as permitted by the GDPR.

2. Scope

The regulation applies to the processing of personal data wholly or partly by automated means and to the processing other than by automated means of personal data which forms part of a filing system, or is intended to form part of a filing system.

3. Territory

The regulation applies to the processing of personal data connected with the activities of a controller or processor located within an EU Member State, regardless of whether or not processing takes place within the Union.

4. Definitions

The GDPR is contained in Regulation (EU) 2016/679. Definitions are also set out in the regulation at Article 4. Some commonly used definitions are summarised below, using the numbering system from Article 4:

(1) Personal Data – any information relating to an identified or identifiable individual (the 'data subject'). Identifiable refers to identifiers such as name, ID number, location data, online identifier, physical, psychological genetic, mental, cultural, or social identity.

(2) Processing – any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure,



dissemination, making available, alignment, combination, restriction, erasure or destruction.

(7) Controller – determines the purposes and the means of the processing of personal data. It is the controller that must be able to show compliance with the principles of GDPR.

(8) Processor – processes the data on behalf of the controller.

(9) Recipient – person or organisation to which the personal data is disclosed, whether a third party or not.

(10) Third Party – a person or organisation, other than the data subject, controller, processor, and persons under the authority of the controller or processor who are authorised to process personal data.

(11) Consent – consent of the data subject must be freely given, specific, informed and unambiguous, through a statement or clear affirmative action, by which s/he signifies agreement to the processing of personal data relating to him/her.

(12) Personal Data Breach – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

5. **GDPR Principles**

Article 5 of the regulation sets out the principles of GDPR, which are summarised below: Personal data is to be:

(a) Processed lawfully, fairly and transparently.

(b) Collected for specified, explicit, and legitimate purposes, and only processed in a manner compatible with those purposes.

(c) Adequate, relevant and limited to what is necessary for the purposes for which they are processed.

(d) Accurate, kept up to date, and that inaccurate data is erased or rectified.

(e) Only retained (stored) in a form that permits identification of data subjects for as long as is necessary.

(f) Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage.

Frontier Camps as the controller is responsible for ensuring compliance with the GDPR principles, including a requirement that the processor of the personal data does so in a compliant manner.



6. Lawfulness of Processing

6.1 Lawful Basis

Article 6 of the GDPR sets out the rules that permit lawful processing of personal data, the 'lawful basis', as follows:

- (a) The data subject has given consent to the processing of their personal data for one or more specific purposes.
- (b) Processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract, such as provision of a quote.
- (c) Processing is necessary for compliance with legal obligations to which the controller is subject. The UK government is permitted through the GDPR to introduce more precisely specific requirements and other measures to ensure lawful and fair processing. The UK's Data Protection Bill, once enacted, will contain any such provisions.
- (d) Processing is necessary in order to protect the vital interests of the data subject or another person. (Vital interest is lifesaving or emergency medical treatment).
- (e) Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller. This condition will not apply to Frontier Camps.
- (f) Processing is necessary for the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

See also paras 9 and 10 relating to special categories of personal data and data relating to criminal convictions and offences. See para 30 for the records of processing that must be retained.

7. Conditions for Consent

Where processing of personal data is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of their personal data.

Where the data subject's consent is given in a written declaration that also contains reference to other matters, the request for consent shall be clearly distinguishable from the other matters. The request for consent shall be intelligible, easily accessible, using clear and plain language.

The data subject has the right to withdraw consent at any time, but this does not affect the lawfulness of the processing of personal data before consent is withdrawn.

Withdrawal of consent is to be made as easy as giving consent.



When deciding whether consent is given freely, account needs to be taken whether the provision of a service is conditional on consent to the processing of personal data that is not necessary for the performance of that service/contract.

8. Reserved

9. Processing of Special Categories of Personal Data

The processing of special categories of personal data is not permitted, unless one of the specified additional conditions described at para 9.2 applies.

9.1 Special Categories of Personal Data

The following are the special categories of data:

- (a) Racial or Ethnic Origin.
- (b) Political Opinions.
- (c) Religious or Philosophical Beliefs.
- (d) Trade Union Membership.
- (e) Genetic Data.
- (f) Biometric Data for Uniquely Identifying a Person.
- (g) Health Data.
- (h) Sex Life or Sexual Health Data.

9.2 Additional Conditions for the Processing of Special Categories of Personal Data

The following additional conditions apply to the processing of special categories of personal data:

- (a) The data subject has given explicit consent, unless there is an overriding prohibition that may not be lifted by the data subject.
- (b) The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or the data subject in the field of employment and social security and social protection law.
- (c) Processing is necessary to protect vital interests of the data subject or another natural person, where the data subject is incapable physically or legally to give consent.
- (d) Processing is carried out in the course of its legitimate activities by a not for profit body with political or religious aims, and the processing relates solely to members, former members or those who have regular contact in conjunction with the organisation's purposes, and the personal data is not shared outside the organisation.



- (e) Processing relates to personal data that is made public by the data subject.
- (f) Processing relates to the exercise or defence of legal claims.
- (g) Processing is necessary for reasons of substantial public interest.
- (h) Processing is necessary for the purposes of preventative or occupational medicine, medical diagnosis, the provision of health or social care, or treatment or management of health or social care systems and services on the basis of applicable law or pursuant to contract with a health professional. The data must be processed by a professional under the obligation of professional secrecy.
- (i) Processing is necessary for reasons of public interest in the area of public health.
- (j) Processing is necessary for archiving in the public interest, scientific or historical research purposes or statistical purposes.

The UK Data Protection Bill, when enacted, may introduce further conditions and limitations concerning health, genetic and biometric data.

10. Processing of Personal Data relating to Criminal Convictions and Offences

Processing personal data relating to criminal convictions or offences shall be carried out only under the control of official authority or when processing is authorised by law. A register of criminal convictions shall be kept only under the control of official authority.

Authorisation by law to process personal data is an additional condition to the lawful basis established under para 6.

The UK's Data Protection Bill, when enacted, will provide the legal authority for processing personal data relating to criminal convictions and offences. The Bill currently states that legal authorisation is given only if the processing meets the conditions of Part 1, 2 or 3 of Schedule 1. Part 3 includes the following conditions relating to criminal convictions:

- (a) The data subject has given consent to the processing.
- (b) The processing is necessary to protect the individual's vital interests, where the data subject is incapable physically and legally of giving consent.
- (c) Processing is carried out in the course of its legitimate activities by a not for profit body with political or religious aims, and the processing relates solely to members, former members or those who have regular contact in conjunction with the organisation's purposes, and the personal data is not shared outside the organisation without the data subject's consent.
- (d) The processing relates to personal data made public by the data subject.
- (e) The processing is necessary for the purpose of any legal or prospective legal proceedings, or for establishing, exercising or defending legal rights.

**11. Reserved****12. Provision of Information**

The controller shall provide the information set out in this section in a concise, transparent, intelligible and easily accessible form, using clear and plain language, within one month of receipt of the request.

The controller may extend the period by a further 2 months, where necessary, taking into account the complexity and number of requests. The controller will inform the data subject of any extension and the reasons for the extension within one month of receiving the request.

If the controller does not take action on the request, the controller is to inform the data subject within one month of the reason for not taking action, and the possibility of lodging a complaint with the ICO and seeking a judicial remedy.

Information will be provided to the data subject in one of written, electronic or oral form, as requested by the data subject.

No charge may be made for providing information to the data subject under the obligations placed on the controller by the GDPR, unless the requests are manifestly unfounded or excessive.

The controller may make a reasonable charge taking into account the administrative costs of responding to the request, in cases of unfounded or excessive requests, or may refuse to act on the request. However, the controller must be able to justify and demonstrate why the request is excessive or unfounded.

If the controller has reasonable doubts as to the identity of the person making the request, the controller may request additional information necessary to determine the identity of the data subject.

13. Information to be provided when Personal Data is collected from the Data Subject

1. When personal data is collected from a data subject, the controller shall provide to the data subject, at the time of collection, with the following information:

- (a) The identity and contact details of the data controller.
- (b) Reserved.
- (c) The purposes of the data processing for which the personal data is intended, as well as the legal basis for the processing.
- (d) The legitimate interests pursued by the controller or the third party when legitimate interest is the legal basis for processing data.
- (e) Recipients or classes of recipients of the data subject's personal data.



2. In addition to the information referred to in para 1, the controller shall provide the data subject with the following information, at the time the personal data is collected:

- (a) The period for which personal data will be stored, or if that is not possible, the criteria used to determine the period.
- (b) The existence of the right to request from the controller access to, rectification or erasure of personal data, or restriction of processing concerning the data subject, or to object to processing, as well as the right to portability.
- (c) Where the lawful basis of processing is consent, the right to withdraw consent at any time, without affecting the lawfulness of data processing based on consent before its withdrawal.
- (d) The right to lodge a complaint with the ICO.
- (e) Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as the data subject is obliged to provide the personal data and of the possible consequence of failure to provide such data.
- (f) Reserved.

14. Reserved

15. Right of Access by the Data subject

1. The data subject has the right to obtain from the controller confirmation of whether or not personal data about him/her is being processed, and if so, access to the personal data and the following information:

- (a) The purpose of the processing.
- (b) Categories of personal data processed.
- (c) The recipients or categories of recipient to whom personal data has been disclosed or will be disclosed.
- (d) Where possible, the envisaged period for which personal data will be stored, or if not possible, the criteria to determine that period.
- (e) The existence of the right to request from the controller access to, rectification or erasure of personal data, or restriction of processing concerning the data subject, or to object to processing.
- (f) The right to lodge a complaint with the ICO.
- (g) Where personal data is not collected from the data subject, any available information as to its source.
- (h) Reserved.



16. Right to Rectification

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data, and the completion of incomplete data.

17. Right to Erasure

The data subject has the right to obtain from the data controller the erasure of personal data concerning the data subject without undue delay when one of the following grounds applies:

- (a) The personal data is no longer necessary in relation to the purpose for which it was processed.
- (b) The data subject withdraws consent where the lawful basis of processing is consent, and where there is no other legal ground for processing.
- (c) The data subject objects to the processing where the legal basis is legitimate interest and there is no overriding legitimate ground for the processing, or the data subject objects to the processing of personal data for marketing.
- (d) Personal data has been processed unlawfully.
- (e) The personal data has to be erased for compliance with a legal obligation to which the controller is subject.
- (f) Reserved.

Paras (a) to (f) do not apply when processing is necessary for the establishment, exercise or defence of legal claims.

18. Right to Restriction of Processing

The data subject has the right to a restriction of processing where one of the following applies:

- (a) The accuracy of the personal data is contested by the data subject, for a period to enable the controller to verify the accuracy of the personal data.
- (b) The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of its use instead.
- (c) The controller no longer needs the personal data for the purposes of processing, but it is required by the data subject for the establishment, exercise or defence of legal claims.
- (d) The data subject objects to the processing of the personal data, pending verification of whether the legitimate interests of the controller override those of the data subject.

Where the processing has been restricted under paras (a) to (d) above, the personal data, except for storage only, is to be processed in accordance with the



data subject's consent, except for the establishment, exercise or defence of legal claims, or for the protection of the rights of another person, or in the public interest.

The data subject shall be informed prior to the lifting of any restriction of processing.

19. Obligation to Notify Rectification, Erasure or Restriction of Processing of Personal Data

The controller is to communicate any rectification, erasure or restriction of processing of personal data to each recipient to whom personal data has been given, unless, unless this proves impossible or involves disproportionate effort. The controller is to inform the data subject about those recipients if the data subject requests it.

20. Right to Personal Data Portability

The data subject has the right to receive personal data concerning them that they have provided to the controller, in a structured, commonly used and machine readable format, and have the right to transmit the data to another controller. This right applies when:

- (a) The legal basis for processing the personal data is consent.
- (b) The processing is carried out by automated means.

Where feasible, the data subject is entitled to have their personal data transmitted from one controller directly to another, when permitted to exercise the right of portability.

The right to portability does not prejudice the right to erasure.

The right to portability shall not adversely affect the rights and freedoms of others.

21. Right to Object

- (a) The data subject has the right to object at any time, based on grounds relating to their particular situation, to the processing of their personal data, where the legal basis for the processing is legitimate interest. The controller may only continue to process the data if the controller can demonstrate compelling legitimate interest that overrides the interests, rights and freedoms of the data subject, or in the establishment, exercise or defence of legal claims.

Where personal data is processed for direct marketing purposes, the data subject has the right to object at any time, to the processing of personal data concerning them for the purpose of marketing. If the data subject objects in this case, the personal data shall no longer be processed for such purpose.

**22. Reserved.****23. Restrictions**

The GDPR permits Member States to restrict the obligations and rights under certain elements of the GDPR, which the UK will achieve through the UK's Data Protection Bill, when this is enacted. The Data Protection Bill is available via the UK government website (.gov).

24. Responsibility of the Controller

Taking into account the varying risk to the rights and freedoms of individuals, the controller is required to implement technical and organisational measures including data protection policies to ensure compliance with the regulations. The controller is to review and update the measures when necessary.

The codes of conduct described in the GDPR Article 40 and the approved certification mechanisms described at Article 42 may be used as ways of demonstrating compliance with the obligations of the controller.

25. Data Protection by Design and by Default

The controller is to take into account the state of art, the cost of implementation, together with the varying risks to the rights and freedoms of individuals posed by personal data processing, and implement appropriate technical, and organisational methods designed to implement data protection principles. Safeguards are to be integrated into the processing, in order to be compliant with the regulation and to protect the rights of data subjects.

The controller is to ensure that by default, and through technical and organisational methods, only personal data that is necessary for each specific purpose is processed. This applies to both the amount of data collected and to the extent to which it is processed, as well as to its storage and its accessibility, in particular control of access. An approved certification mechanism as described in the GDPR at Article 42 may be used as an element to demonstrate compliance with the requirements.

26. Reserved**27. Reserved****28. Processor**

Frontier Camps processes all its own data within its own volunteer workforce and does not contract out its processing requirements. The following requirements apply to Frontier Camps acting as both the controller and the processor:

(a) Processing will not be undertaken by another processor without a specific written contract between the controller and the processor. Any other processor engaged by Frontier Camps will need to guarantee that it meets the requirements of the regulation and be willing to permit Frontier Camps to audit that compliance.



- (b) Persons authorised to process personal data must commit themselves to confidentiality.
- (c) Persons authorised to process personal data are to take all appropriate measures, as determined by the processing procedures to ensure the security of personal data.
- (d) Persons authorised to process personal data are not to permit another person to process that data without the written authorisation of the controller.
- (e) Any person who has authorised access to personal data under the authority of the controller not process that data except on instructions from the controller, unless required to do so by law.

29. Reserved

30. Records of Processing Activities

1. The controller is to maintain a record of processing activities under its responsibility. The record must contain the following information, which may be found at Appendix A:

- (a) The name and the contact details of the controller.
- (b) The categories of the data subjects and of the categories of personal data.
- (c) The purposes for the processing.
- (d) The categories of recipients to whom personal data has been or will be disclosed.
- (e) Reserved.
- (f) Where possible, the envisaged time limits for erasure of the different categories of data.
- (g) Where possible, a general description of the technical and organisational security measures.

2. The data processor is to keep a record of all processing activities carried out on behalf of the controller. Since Frontier Camps is also the processor, these requirements are fulfilled through para 1 above.

3. The requirements specified in paragraphs 1 and 2 must be in writing, including in electronic form.

4. The controller and the processor are required to make the records available at the request of the ICO.

5. The requirements of para 1 and 2 apply to organisations employing 250 or more persons, or where the processing carries a high risk to the rights and freedoms of individuals, or the processing is frequent, or the processing includes special categories of data or data relating to criminal convictions and offences.



31. Cooperation with the ICO

The controller and the processor are required to cooperate with the ICO.

32. Security of Personal Data

As set out at para 25, appropriate security appropriate to the risk may be achieved by a number of methods, including:

- (a) Pseudonymisation and encryption of personal data.
- (b) The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems.
- (c) The ability to restore the availability and access to personal data in a timely manner in the event of physical or technical incident.
- (d) A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of processing.

In assessing the appropriate level of security, risks associated with processing, in particular, accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or processed. The GDPR Articles 40 and 42 describe a code of conduct and an approved certification mechanism, which may be used as elements to demonstrate compliance with these requirements.

33. Notification of a Personal Data Breach to the ICO

Where a breach of personal data has occurred, the controller is to inform the ICO within 72hrs of the breach being detected, unless the breach is unlikely to result in a risk to the rights and freedoms of the data subjects. If not submitted within 72hrs, the report shall be accompanied by reasons for the delay.

The processor is required to inform the controller of a breach without undue delay.

When notifying the ICO, the controller shall include the following:

- (a) Describe the nature of the personal data breach, and where possible the categories and approximate number of data subjects.
- (b) Provide contact details of a person who can provide more information, who will be the Data Protection Officer if one has been appointed.
- (c) Described the likely consequences of the personal data breach.
- (d) Describe the measures taken by the controller to address the breach, including measures to mitigate its adverse effects.

Where it is not possible to provide all the information immediately, the information may be provided as soon as possible afterwards without further undue delay.



Following any personal data breach the controller is to record the facts relating to the breach, and the remedial action taken to prevent recurrence.

34. Communication of a Personal Data Breach to the Data Subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. Clear and plain language shall be used, and the communication is to include all the information to be reported to the ICO at para 33 above, and the remedial action taken to prevent recurrence.

Where it would involve disproportionate effort to inform data subjects of a breach of personal data, a public notice may be used, providing the data subjects are informed in an equally effective manner.

35. Data Protection Impact Assessment

Where there is a high risk to the rights and freedoms of individuals posed by personal data processing, particularly when introducing new technology, the controller is to carry out a data impact assessment. In respect of the personal data processing carried out by Frontier Camps, no data protection impact assessments are required, due to the nature, size and availability of the processing it undertakes.

36. Reserved

37. Data Protection Officer

Frontier Camps is not required to appoint a data protection officer. Public bodies/authorities, organisations involved in systematic monitoring of data subjects on a large scale, and those organisations processing special categories of data or data relating to criminal convictions or offences on a large scale, are required to appoint a data protection officer.

The Frontier Camps trustees will appoint a person to take a lead role in data protection issues, respond to requests from data subjects, report any data breaches to the ICO and data subjects, and act as a single point of contact for data protection issues.

38. Reserved

39. Reserved

40. Codes of Conduct

Frontier Camps is not signed up to an industry code of conduct.

41. Reserved

42. Certification

Frontier Camps is not certified by any certification body to carry out data processing. Certification is not a requirement under GDPR.

**43. Reserved****44 – 76. Reserved****77. Right to Lodge a Complaint with a Supervisory Authority**

Every data subject has the right to lodge a complaint with the ICO if the data subject believes that the processing of their data infringes the GDPR.

78. Right to an Effective Judicial Remedy against a Supervisory Authority

A data subject has the right to a judicial remedy against a legally binding decision of the ICO concerning them. The data subject also has the right to a judicial remedy of the ICO does not handle a complaint or does not respond to a complaint within 3 months to update the complainant on the progress of the complaint or its outcome.

79. Right to an Effective Judicial Remedy against a Controller or Processor

Regardless of any other remedy, including lodging a complaint with the ICO, a data subject has the right to an effective judicial remedy where the data subject believes that the processing of their data infringes the GDPR.

80. Reserved**81. Training**

All adult volunteers at Frontier Camps will receive initial and bi-annual recurrent Data Protection training. Training will also be given when major changes to Data Protection legislation are published. Knowledge will be assessed via a quiz.

82. 'Sending' Groups

The structure of Frontier Camps permits both groups of children/young people and individual children/young people, as well as accompanying adult group leaders/volunteers and individual volunteers to participate in camps. Applications to participate in Frontier Camps by individuals made directly to Frontier Camps fall within this Policy. Where sending groups control the applications process themselves, this Policy does not apply until personal data is given to Frontier Camps.

Sending groups must have their own data protection policies and comply with them.

In many cases, the adult volunteers/group leaders of the a sending group will also be recognised volunteers of Frontier Camps, and while this dual role has the potential to introduce ambiguity, it is up to the leaders of sending groups to make it clear when dealing with their own groups, in which roles they are acting, and to use the appropriate Policy.



APPENDIX A

Records of Processing Activities

- (a) The name and the contact details of the controller and processor.

The Trustees of Frontier Camps

5 Grove Park
Liverpool
L8 0TL

- (b) The categories of the data subjects and of the categories of personal data.

- (i) Categories of Data Subjects.

Ref	Data Subject	Abbreviation	Role
I	Adult Volunteer	AV	Adult Leader during the period of a Camp
II	Under 18 Volunteer	U18	Junior Leader during the period of a Camp
III	Children	C	Child/Young Person attending Camp as a Camper
IV	Parent	P	Parent of U18 or C
V	Member	M	Adult Volunteer who chooses to enter into membership of Frontier Camps, or an Adult who undertakes other roles in the service of Frontier Camps, such as setting up and taking down Camp
VI	Others	O	Other persons not included in the organisation of Camp, but about whom a child or young person may make an allegation of abuse



Ref	Data Subject	Abbreviation	Role
VI	Supporter	S	A person who may make a donation to Frontier Camps, and may also complete a gift aid declaration.
VII	Referee	R	A person who provides a reference for an adult volunteer.

(ii) Categories of Personal Data.

Ref	Category of Personal Data	Data Subject	Notes
A	Name	AV, U18, C, P, M, S, R	
A1	Role within Frontier Camps	AV, U18, C, P, M, S	As per role definitions I to VI
A2	Role outside Frontier Camps	R	Specifically referees who may not be Frontier Camps volunteers, but who need to fulfil acceptable roles, ie priest, youth leader, with knowledge of the applicant (AV), etc
B	Address	AV, U18, C, P, R	
C	Contact Details	AV, U18, P, M, S, R	Telephone, mobile, email
D	Date of Birth	AV, U18, C	
E	Experience of working with young people/qualifications	AV, U18	
F	Next of Kin/emergency Contact Details	AV, U18, C, P	
G	Visual Images	AV, U18, C	Recording of persons on site and promotion
H	Financial Details	AV, P, S	Bank records, gift aid forms, tax status
I	Gender	C	Explicit collection only for C, but may be inferred by name



Ref	Category of Personal Data	Data Subject	Notes
J	Age	AV, U18, C	Explicit collection only for C, but DoB reveals age
K	Membership Status	M	Membership of Frontier Camps under its Constitution
L	Training Record	AV	Records of training undertaken for Frontier Camps, ie health and safety quiz, food hygiene, etc

Note that a standalone Privacy Policy governs the use of the Frontier Camps website, and this available on the site itself.

(iii) Special Categories of Personal Data.

Ref	Category of Personal Data	Data Subject	Notes
M	Health	AV, U18, C	
N	Religious Belief	AV, U18, C, M	Explicit agreement with Statement of Faith requested only for AV, and for M via agreement with Constitution. For others, only via reference to any involvement with a church, which does not necessarily imply belief

(iv) Criminal Conviction and Offences Data.

Ref	Category of Personal Data	Data Subject	Notes
O	Criminal Conviction and Offence	AV	Self-declaration and DBS application
P	Criminal Conviction and Offence (Alleged)	AV, P, M, O, U18, C	Allegations of abuse by C, U18 against AV, P, M, O, or other C or U18

(c) Legitimate Interest Assessment.

The lawful basis for the processing of the following personal data is legitimate interest.



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Name	<p>We need to know who is at Camp, for the safety of the children and young people (knowing where each child is at any time), and to know which adults are present and interacting with the children, ie all those on site and those carrying out specific roles related to the children. Necessary means of differentiating between people to allocate tasks and resources. Processed in order to be able to communicate with each person attending Camp. Processed in order to establish who is a Member of Frontier Camps.</p> <p>Referee name is collected as part of a 'safer recruiting' policy.</p>	<p>Entirely reasonable and within the expectations of the children and their parents, as well as adult and young leaders. We all expect to be called by our name, and it is essential for organising Camp that names are processed.</p> <p>Necessary that the membership is established in order to conduct AGM and vote in accordance with the Constitution and the expectations of the Charity Commission.</p> <p>Necessary to collect referee's name in order to establish their identity (as part of the Safeguarding Policy)</p>	<p>Low impact.</p> <p>It is in the interests of both those attending Camp and the organisers of Camp that names are processed.</p> <p>It is in the interests of the Members that they are known, so that they can exercise their right to vote at AGM and to influence the decisions of the charity.</p> <p>It is in the interests of all at Camp, and in particular the young people, that safe recruitment processes are followed, and the use of referees is essential to that process</p>



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Role In Frontier Camps	A role is allocated by Frontier Camps by the Trustees, Team Leader, and by self-determination	It is necessary to assign roles for the organisation of Camp, and for all attending Camp to be aware of who holds those roles at Camp. The roles of C, P and S are by self-determination.	Very Low Impact. Essential for the proper management of Camp that roles are defined and published. (P and S are not published at Camp)
Role outside Frontier Camps	To substantiate that the person giving a reference meets the policy requirements, of the Safeguarding Policy, and is therefore, a suitable person to give a reference	It is necessary to ensure that persons giving references are qualified to do so by occupation.	Very Low Impact Essential that the occupation of the person giving the reference is known. (Role of the referee (R) is not published at Camp, and is known only to those involved in the recruitment process).



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Address	<p>Processed so that Frontier Camps is able to communicate with those attending Camp, including the parents of children and young people attending Camp.</p> <p>Communications include Camper and Staff Handbooks to advise attendees of essential information.</p> <p>Processed so that Frontier Camps is able to contact the referee in order to fulfil the recruitment process.</p>	<p>Entirely necessary to communicate by post with those attending, and both reasonable and within their expectations to do so for the purposes outlined.</p> <p>Necessary to be able to contact a referee once a reference is given, so that the recruitment process may be followed.</p>	<p>Low impact.</p> <p>In the interests of both the individual and the organisation of Camp to be able to communicate and to share essential information about Camp.</p> <p>Essential to the interest of Frontier Camps, that referees are involved in a safer recruitment process.</p>



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Contact Details	<p>Processed for the purposes of routine communication of essential information about Camp, and also in case of the need to communicate with/ask questions of parents of children and young people about their child, both before and during Camp, and to communicate in the event of an emergency.</p> <p>Processed to be able to communicate about Camp with adult volunteers and Members before, during and after Camp for its organisation, the arrangement of AGM and other meetings, to obtain feedback on Camp and for effective communication during Camp.</p>	<p>Necessary to be able to communicate essential information, and be able to communicate immediately with parents about a child or young person in cases of health or behavioural issues or in the event of an emergency. Fully within the reasonable expectation of those attending Camp and the parents of children.</p> <p>Necessary to be able to communicate with volunteers and Members in order to organise Camp and run the Charity.</p>	<p>Low impact.</p> <p>In the interests of both individuals and Camp that Camp communicates with them about the running of Camp</p> <p>(Contact details for referees is processed as for 'Address', above).</p>



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Date of Birth	<p>DoB processed for Campers to ensure they meet the required age range for which Camp caters, and used to organise Campers into tents. Shared with third parties as necessary to enable activity providers to ensure that children meet any age based restrictions.</p> <p>DoB processed for U18 volunteers to ensure they meet the age requirement to be a Junior Leader.</p> <p>DoB processed for Adult Leaders to ensure that Adult Leaders are over 18, and able to fulfil Camp's legal obligations.</p>	<p>Necessary to determine the age of Campers and U18 Volunteers to ensure they meet age related restrictions. Imposed by Camp.</p> <p>Necessary to process DoB of Adult Volunteers to ensure they are over 18 and able to act in the legal capacity of an adult.</p>	<p>Low Impact.</p> <p>In the interests of Campers and of Camp to ensure that Campers meet the age limit requirements for which Camp caters, in order to ensure maximum enjoyment and value for Campers and to limit any negative impact of Campers that are too young or too old to participate appropriately at Camp.</p> <p>In the interests of U18 Volunteers and of Camp that U18 Volunteers meet the age requirements and are sufficiently mature to carry out the role of Junior Leader.</p> <p>In the interests of Volunteers and of Camp that only adults are assigned roles that require adult supervision.</p> <p>Necessary to establish age, and hence fee to be paid, ie Adult/U18 Volunteer, Camper or U9 child of volunteer</p>



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Experience of working with young people/qualifications	To use volunteers where they have experience and/or qualifications.	Improve how camp works. Encourage volunteers by using them in roles they wish to undertake and where they can contribute most. Improve the experience of Camp for young people.	Low impact. It is in the interests of both the volunteer and of Camp for an individual to be used in a role they wish to undertake, and in which they have experience and/or qualifications.
Next of Kin/emergency Contact Details	Processed in order to be able to contact nominated person(s) in the event of an emergency	Camp must be able to inform NoK when a serious event occurs and the individual is incapable of making contact him/herself.	Medium Impact. Camp may be processing the contact details of a person not associated directly with Camp or their parents, but it is in the interests of the individual and of Camp that the nominated person is contacted, and it is within the expectations of the nominated person that they would be contacted in the event of an emergency, and that their details would be need to be processed or this purpose.



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Visual Images	To record who is on site during the week in the form of a close up facial shot and whole of Camp photograph, and to distribute the whole of Camp photograph to participants of the Camp.	The facial shot is necessary in the event of a missing person, to show to the police/authorities, to expedite the search. The whole of Camp photograph is a record of all persons on site as a permanent record of those who attended, and may be used to establish or defend a legal action.	Medium Impact. Individuals are sometimes reticent about appearing in photographs, perhaps through self-consciousness. However, the ability to respond expeditiously to a missing child event overrides this potential impact, with the additional safeguard that the close-up photographs are not shared unless for the purpose described, and are deleted at the end of the week of Camp. The group photographs are a necessary permanent record of those at Camp, and each person appears only as a small image within the group photograph. The legitimate interest of the Camp is not overridden by the necessity of retaining a visual record of those attending a Camp, and most attending Camp would also wish to retain a visual memento of the Camp.



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Financial Details	To record who has paid, in relation to their, or their dependant's attendance at Camp and for the processing of gift aid forms.	Necessary to ensure that Camp collects all monies owed, in order to ensure its financial viability, and makes the most of its charitable status.	<p>Medium Impact.</p> <p>It is in the interests of both the person making payment and of Camp that payment is made as this secures access to the activities provided by Camp, and/or fulfils the individual's wish to Volunteer at Camp, while providing the necessary resources to enable Camp to take place. Gift aid forms enable Camp to increase its income, which benefits all its participants, and once submitted and reclaim made with HMRC, their retention becomes a legal requirement.</p> <p>Processing of a reduced fee at the discretion of Camp may indicate financial status, so must be safeguarded.</p> <p>Financial information is necessarily shared with financial institutions, and its retention by those institutions is in accordance with their own policies and legal requirements.</p>



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Gender	Processed to ensure that the number of male/female Campers does not exceed the accommodation available, and to ensure that sufficient adult volunteers of each gender are available to supervise each gender.	It is not possible to plan to ensure suitable accommodation and adequate supervision without knowledge of the gender of Campers.	Medium Impact. An individual's gender may be a sensitive topic for some, due to a variety of reasons. However, Camp has legal and best practice obligations, explained in its Safeguarding Policy, which require knowledge of gender in terms of male and female descriptions.

FINAL DRAFT



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Age	<p>To ensure Campers meet the nominal age restrictions defined by Frontier Camps, and to allow Camp to decide on an appropriate age distribution of Campers in the available accommodation. To ensure the U18 Volunteers meet minimum age requirements, for the purposes of the maturity necessary to undertake junior leadership roles and to respond suitable to a working environment. To ensure that Adult Volunteers are over 18 years old.</p>	<p>There is an absolute legal age requirement for defining an adult.</p> <p>Camper and U18 Volunteer age limits are nominal are decided on a case by case basis, but knowledge of age forms a part of that assessment, and an individual's age may not be significantly different from the nominal range, as experience has shown that individual enjoyment is unsatisfactory when the age is significantly different.</p>	<p>Low Impact</p> <p>It is in the interests of the Campers and U18 Volunteers that they are within the nominal age ranges set by Frontier Camps, as their enjoyment of Camp would otherwise be impaired.</p> <p>It is a legal requirement for Camp for there to be adequate adult supervision, which can only be ensured by demonstrating that supervisor are legally adults.</p>



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Membership Status	To establish the membership of Frontier Camps for the purposes of complying with the Constitution and voting at membership meetings	It is necessary under the Constitution and charity law for Frontier Camps to hold AGM, and where necessary EGM, for the purposes of proper governance of the charity, at which decisions are taken, based on membership status.	Low Impact. It is in the interests of the individual to be able to exercise rights under the Constitution and charity law, and for the good governance of the Frontier Camps charity.

FINAL DRAFT



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Health	<p>Ensuring continuity of healthcare while at Camp for those who need treatment (inhalers, medicine, behavioural health needs, etc). Ensuring the safety of those persons being treated and others (restricted access to medicines, suitable supervision). Enabling Frontier Camps to assess risk in relation to those attending at Camp, their state of health and the activities undertaken, and for third party activity providers to be able to do the same. To enable Frontier Camps to ensure that adequate provision is made for health needs and to do all that is reasonable to cater for diverse health requirements, in order to encourage inclusion.</p>	<p>Necessary to protect the health of those at Camp and to ensure inclusion.</p> <p>Necessary to ensure the safety of those at Camp by enduring that access to medicines is properly controlled and administered only to those for whom it is prescribed.</p> <p>Necessary to remove any barriers faced by disabled people at camp by making adjustments.</p>	<p>High Impact.</p> <p>It is in the interests of persons attending Camp that:</p> <p>Dietary needs are met.</p> <p>Allergy needs are met.</p> <p>Those with a health, disability or long term condition are supported to be included.</p> <p>Those needing to take medication are supported to take their medication.</p> <p>The needs, disabilities or health conditions of individuals are special category data and their disclosure may cause fear of prejudicial treatment.</p>



Category of Personal Data	Purpose. (Why is the data being collected?)	Necessity. (Is it reasonable, or is there another way of going about it?)	Balance. (Does the impact of the processing override the legitimate interests?)
Religious Belief	Constitutional requirement of the Frontier Camps charity.	Necessary to ensure that the primary driving force of the charity remains Christian outreach, and that its decision making is grounded in Christian philosophy	Medium Impact. Expression of religious belief or alignment with a religious organisation is not positively received by everyone in society. The Frontier Camps charity was set up as a Christian charity, and membership is entirely voluntary.

(d) Consent

A. The lawful basis for the processing of the following personal data is consent:

Category of Personal Data	Purpose. (Why is the data being collected?)
Images*	Collected for promotional purposes. Images may appear on the Frontier Camps website, or in its annual Newsletter, or other official communications authorised by the Trustees or an Officer of the Frontier Camps charity.

*Note that any images taken by youth group leaders of their own groups are the responsibility of the sending youth group, and any consents necessary for such images are subject to the sending group's own data protection policies.

B. Included with the 'Additional Condition' required to process Special Category Data (Health) (see below) is a requirement to obtain consent in order to share health data on the following bases:



Special Category of Personal Data	Purpose. (Why is the data being collected?)
Health	Special Category Data (Health) is shared with third party activity providers when consent is given and the activity provider has legitimate interest or processes for performance of contract. Only the following data may be shared – height and specific conditions that the provider prohibits (when severity or degree of impairment is specific to the activity), or when we share information about the impact of a disability/health condition, so that third party providers can ensure the safety of individuals during the service provision and make adjustments during service provision.
Health	Special Category Data (Health) is shared with healthcare professionals under a legal duty of confidentiality when, in the view of any Adult Volunteer or U18 Junior Leader, professional medical advice should be sought.

(e) Legal Obligation

The lawful basis for the processing of the following personal data is legal obligation.

Category of Personal Data	Purpose. (Why is the data being collected?)
Criminal Conviction and Offence	Legal obligation for all adult volunteers to undertake a DBS check for work in a regulated activity, and for Frontier Camps to be able to take appropriate decisions in accordance with its Safeguarding Policy to ensure the safety of all at Camp, and in particular children and young people.

(f) Additional Conditions or Special Category Personal Data and Criminal Conviction and Offence Data

The following conditions apply to Special Category Personal Data and Criminal Conviction and Offence Data, in addition to the lawful basis defined above, as required by GDPR.

Category	Additional Condition
Health	Processing is carried out in the course of Frontier Camps’ legitimate activities as a not for profit body with religious aims, and the processing relates solely to members, former members or those who have regular contact in conjunction with Frontier Camps’ purposes, and the personal data is not shared outside Frontier Camps without specific consent. (See consent above).



Category	Additional Condition
Religious Belief	Processing is carried out in the course of Frontier Camps' legitimate activities as a not for profit body with religious aims, and the processing relates solely to members, former members or those who have regular contact in conjunction with Frontier Camps' purposes, and the personal data is not shared outside Frontier Camps.
Criminal Conviction and Offence	Processing is carried out in the course of Frontier Camps' legitimate activities as a not for profit body with religious aims, and the processing relates solely to members, former members or those who have regular contact in conjunction with Frontier Camps' purposes, and the personal data is not shared outside Frontier Camps*.

*Note that the individual himself/herself applies to an umbrella organisation for a DBS certificate as a volunteer working in a regulated activity on behalf of Frontier Camps. As the volunteer makes the application, the information provided through the DBS process is only governed by this policy once it has been shared by the individual with Frontier Camps. Options for Change is the umbrella organisation for Week 1, and CCPAS is the umbrella organisation for Week 2.

- (g) The categories of recipients to whom personal data has been or will be disclosed.
- (i) Internal.
- A. Trustees have access to all Camp personal data, whenever required to fulfil their legal obligations, and have access at all times to Membership Status.
- B. The Team Leader of each Week of Camp, appointed by the Trustees, has access to all personal data related to the Week s/he leads in order to fulfil his/her obligations, and to ensure that .Adult Volunteers are assigned appropriate roles.
- C. The 'Boss*' of each Week of Camp, has access to all personal data related to the Week s/he leads. (*The person appointed by the Trustees to manage the day to day Camp programme, to manage volunteers and to take a lead role in managing discipline on site).
- D. The Lead First Aider, appointed by the Team Leader, or in their absence a designated substitute, of each Week of Camp has access to all health data for every individual attending their Week of Camp.
- E. Persons are appointed by the Team Leader for each Week to process application forms, including health data, and criminal conviction and offence data.



- F. Persons are appointed by the Team Leader for each Week to register all individuals on site, receive any personal data given to them, and to take an image of each individual for the purposes described in the Legitimate Interest Assessment at para (c) above.
- G. A person or persons are appointed by the Team Leader of each Week to be the official photographer(s), and these persons are the only authorised Camp photographers (excepting those referred to in para (F)). See the Frontier Camps Safeguarding Policy for more information regarding images.
- H. The Lead Cook for each Week of Camp has access to dietary and allergy information for their Week of Camp, in order to ensure that meals are safe and suitable for all those attending Camp.
- I. Tent Leaders appointed by the Team Leader for each Week are given access to any relevant personal data, including health data for Campers in their Tent, in order to ensure their safety, provide necessary support and to be able to pass this information to third party activity providers (and in the case of health data, when specific consent has been given) when this information is relevant to the activity and conforms to the provider's own policies, and to be able to provide relevant information to healthcare professionals if off site medical treatment is required (when specific consent has been given).
- J. The Trustees will appoint a person to take a lead role in data protection issues. The appointed person has access to all personal data processed by Frontier Camps, and is responsible for responding to individual requests to know what personal data Frontier Camps holds about them, and to organise for the retrieval of that personal data from its storage locations.
- K. The Team Leader for each week will appoint a Safeguarding Children Officer (SCO), whose role is defined in the Frontier Camps Safeguarding Policy. The SCO shall have access to relevant personal data processed for each data subject
- L. Adult Volunteers and U18 Junior Leaders. AV and U18, in roles other than those specified above, are provided with information relevant to their roles, comprising normally of name, gender and age.



With Whom Shared?	About Whom Shared Internally?	*What Shared? (As relevant to personal data initially processed). See Ref column from Categories of Personal Data tables.
Trustees	AV, U18, C, P, M, S, R	Ref A to O, as required to fulfil legal obligations and governance of the Frontier Camps charity. Ref K at all times.
Team Leader	AV, U18, C, P, M, R	Ref A to O. (P in accordance with Safeguarding Policy)
'Boss'	AV, U18, C, P, M, R	Ref A to O
Lead First Aider	AV, U18, C	Ref A to D, F, I, J, M
Application Processors	AV, U18, C, P, M, R	Ref A to O (Except L)
On Site Registration	AV, U18, C, P, M	Ref A to J, M to O. Any of the referenced personal data if provided on site and necessary to process application or payment at start of Camp.
Official Photographer(s)	AV, U18, C	Ref G
Lead Cook	AV, U18, C	Ref M Restricted to dietary and allergy information.
Tent Leaders	C	Ref A to D, F, I, J, M. Restricted to relevant information regarding Campers in their assigned Tent.
Data Protection Lead	AV, U18, C, P, M, R	Ref A to O when a Data Subject requests information on data held about them, or legitimate data requests are made by the authorities
Safeguarding Children Officer	AV, U18, C, P, O, R	Ref A to D, F, I, J, P
Other AV and U18	AV, U18, C	A, I, J

*Data can only be shared if it has first been collected. See tables at Appendix A para (b) for personal data that has been processed/collected.

(ii) Third Party.

Note that personal data shared with a third party becomes the responsibility of the third party as a Controller under the meaning assigned by GDPR.

A. Activity providers who have a legitimate interest in name, contact details, NoK, age/DoB, and relevant health data. Health data sharing is limited to height, or any specific conditions that the provider prohibits or restricts, or which may reduce enjoyment or inclusion, in order to safely and appropriately conduct an activity, and only to providers who have



their own data protection policy. All data shared with a third party provider becomes the responsibility of the third party under its own data protection policy, in accordance with GDPR. Note that the sharing of health data is subject to specific consent described at para (d)(A). For instance, an example of relevant sharing would include sharing information about the impact of a disability/health condition, so that a third party provider can ensure the safety of individuals during the service provision and make adjustments during service. This type of sharing promotes, with the consent of the individual, inclusion, and acts against discrimination and exclusion.

B. Healthcare professionals under a legal obligation of confidentiality to whom any Adult Volunteer or U18 Junior Leader refers another person when s/he believes that professional medical advice should be sought. Note that the sharing of health data is subject to specific consent described at para (d)(A).

C. Financially and Legally Qualified Persons or Organisations. Frontier Camps is under a statutory obligation to ensure that it maintains accounts and financial records in accordance with charity legislation. As part of its statutory obligations, Frontier Camps may be required to subject its records to audit or inspection by a third party. The Trustees will decide when audit or inspection is required by law, and will appoint auditors or inspectors in accordance with the statutory requirements. At the discretion of the Trustees, when the Trustees believe that additional financial information or guidance is required for the benefit of the charity, financial records may be shown to additional legally or accountancy qualified third parties. Personal data supplied in this context includes name, role at Camp, financial data (including amount paid, any financial data included in bank paying in books, and bank statements including bank account details).

D. Police Services. Information will be supplied to Police Services when Frontier Camps is under a statutory duty to do so, or if the police service is contacted by Camp to report a missing person or criminal activity. Requests for information are to be coordinated by the person appointed by the Trustees to take a lead in data protection issues, or when requests are received during the period of Camp, by the senior available Camp Leader.

E. Government /Local Government Representatives. Information will be supplied to Government representatives when Frontier Camps is under a statutory duty to do so. Requests for information are to be coordinated by the person appointed by the Trustees to take a lead in data protection issues, or when requests are received during the period of Camp, by the senior available Camp Leader. The Safeguarding Policy requires that the Social Services Department is informed when an allegation of abuse involving a child, is made. If Camp is required to report an allegation of abuse, this will be undertaken by the Safeguarding Children Officer.

F. HMRC. Gift aid information including name, address, contact details and financial information may be requested by HMRC in support of a gift aid application made by Frontier Camps. The Treasurer will coordinate requests for financial information by HMRC.



G. Anonymised general information is reported annually by Frontier Camps to the Charity Commission as required by charity law. Frontier Camps is also required to report the details of any serious incidents to the Charity Commission, which may involve any personal data processed for any data subject. Requests for information are to be coordinated by the person appointed by the Trustees to take a lead in data protection issues, or when requests are received during the period of Camp, by the senior available Camp Leader.

H. Images and Newsletters containing images, where specific consent has been obtained for those images, may be placed on the Frontier Camps website and are effectively placed in the public domain.

With Whom Shared?	About Whom Shared Externally?	*What Shared? (As relevant to personal data initially processed). See Ref column form Categories of Personal Data tables.
Activity Provider	AV, U18, C	Ref A to D, F, J. Limited and relevant Ref L with consent (general state of health, height, specific conditions if relevant to activity)
Healthcare Professionals	AV, U18, C	Ref A to D, F, I, J. M with consent.
Financial and Legal Professionals	AV, P	Ref A and F
Police Services	AV, U18, C, P, O	Ref A to P
Government/Local Government Representatives	AV, U18, C, P, O	Ref A to P
HMRC	AV, U18, C, P, S	Ref A to D, H. J
Charity Commission	AV, U18, C, P, M, O	Ref A to P
Public Domain	AV, U18, C	Ref G. For those images processed by consent for promotional purposes.

*Data can only be shared if it has first been collected. See tables at Appendix A para (b) for personal data that has been processed/collected.

- (h) Reserved.
- (i) Where possible, the envisaged time limits for erasure of the different categories of data.



Category of Personal Data	Envisaged Retention Period	Notes
Name	50 years	Name, year of attendance and role at Camp will be retained for 50 years as proof of attendance, in order to establish or defend any legal claim.
Role in Frontier Camps	50 years	As per Name above
Address	6 years	Needed to tie in with accountancy practices, including gift aid requirements.
Contact Details	6 years	As per address.
Date of Birth	6 years	Necessary to establish appropriate fee, and hence linked to accounts, ie Camper or Volunteer fee paid
Experience of working with young people/qualifications	6 years	
Next of Kin/emergency Contact Details	6 years	
Visual Images (Legitimate Interest)	1 year/50 years	The full face image used for safety will be erased each year. The photograph of the whole of Camp will be retained for 50 years, as per 'Name', above. Note that the whole of Camp photograph will be given to attendees as a memento, so Frontier Camps no longer controls the data.
Visual Images (Consent)	No retention period set	Images processed by consent will be used in Newsletters and on the Frontier Camps website, which after they are distributed, Frontier Camps no longer controls the data.
Financial Details	6 years	Required as evidence to justify Annual Accounts and gift aid claims with Charity Commission and HMRC.
Gender	50 years	As per Name requirements
Age	50 years	As per name requirements. Age at time of attendance at Camp.
Training Record	6 years	Coincides with removal of other personal data.
Membership Status	6 years	Aligned to Annual Report and Accounts and evidence of Membership for decision making at the AGM and/or EGM



Category of Personal Data	Envisaged Retention Period	Notes
Health	3 years	While, ideally, for security reasons, Special Category health data should be erased as soon as possible, it is necessary, in order to establish or defend a claim, to retain health data, including a record of any treatment given by the Lead First Aider at Camp, for a suitable period to allow any associated issues to become evident.
Religious Belief	6 years	Linked to Membership Status and, therefore, aligned with Annual Report and Accounts.
Criminal Conviction and Offence (Self-declaration & DBS)	6 months/50 years	Certificate information retained for no longer than 6 months from the date a recruitment decision is taken, in line with DBS guidance. However, we retain a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of the recruitment decision taken, while the Volunteer is active, and for 50 years thereafter, as per Name, above.
Criminal Conviction and Offence (Alleged Abuse)	Until given to Social Services and reported to Charity Commission	Anonymised data may be retained if the abuse is alleged against AV or U18 at Camp, so that Camp may review lessons learned and improve its recruitment procedures.
Referee Details	6 years	Removed following receipt of a valid new personal reference, or 6 years, whichever the later

- (j) Where possible, a general description of the technical and organisational security measures.

The technical and organisational security measures are as follows:

Category of Personal Data	Technical and Organisational Security Measures	Notes
All Data (unless specified below)	Collected via electronic form (hosted by G Suite), or electronic completion of a pdf	G Suite requires 2 step verification, and the Data Protection Lead authorises users and devices. Application forms are removed from G Suite at the end of each summer season, transferred to offline media



Category of Personal Data	Technical and Organisational Security Measures	Notes
	<p>form, which is then emailed, or via paper completion of the pdf form, which is sent by mail, or hand delivered during on-site registration.</p>	<p>storage, and retained securely with Camp documentation at the nominated address.</p> <p>PDF forms are sent to the person responsible for application processing via email or post. Emailed PDF forms are transferred to offline media storage and are stored securely with Camp documentation at the nominated address. Paper forms are dealt with as below.</p> <p>Connection to G suite is encrypted, as are emails between the Camp email addresses (and to any other Gmail email address). (Gmail is used to transport Camp email communication registered with the domain frontiercamps.com).</p> <p>(The domain frontiercamps.com is registered via Go Daddy. The Camp website is hosted by Fasthosts. No personal data is stored on either Go Daddy or Fasthosts servers, other than the financial and linked details of the person purchasing the services, which are given to those organisations by the person making the purchase, and in accordance with those organisations' data protection policies. The person making the purchases makes a personal choice to share his/her personal data. A standalone privacy policy governs the use of the website and is found on the website).</p> <p>PDF forms are hand delivered to on site registration personnel at Camp. After Camp, paper forms are stored securely with Camp documentation at the nominated address.</p> <p>Where an email client is used to download and upload emails, the connection protocols must use SSL or equivalent, and the receiving hard drive must be encrypted (using bitlocker or equivalent). Encryption of the hard drive prevents another person from removing</p>



Category of Personal Data	Technical and Organisational Security Measures	Notes
		<p>the hard drive and accessing it in another computer. Email clients must be set up in such a way as to ensure that when emails are deleted from the client, emails remain available on the server until a decision is made to delete them in accordance with this Policy. When an email client is used, care must be taken when disposing of any hard drive that has contained Camp emails. Data stored on a hard drive is never completely deleted, but is only 'forgotten', and may be recovered. Therefore, the only safe way of deleting data is to destroy the hard drive. Email clients should only be used when necessary, ie to enable work offline or to provide any necessary data portability. Email should only be stored in an email client for as long as it is needed, including Camp contact lists, ie during preparation for Camp, the period of Camp and any post-Camp administration.</p> <p>All other data should normally reside on G Suite. However, during the period of Camp, due to the lack of internet access on site, and due to the need to be able to access data immediately, personal data should be stored on at least 2 laptop/mobile devices at Camp. The rules for off line storage of data, ie hard drive encryption, etc, are as for use of email clients, above.</p> <p>The Data Protection Lead has complete administrative control over G Suite, and is able to enforce 2 step verification, strong passwords, device access, password reset, audit of device connection, and all other security measures and checking.</p> <p>Passwords and any other security sensitive material may not be communicated by any insecure means, including email. Passwords may not be shared with anyone other than the person to whom they are assigned. The only exception to this is that passwords relating to the ownership of G Suite, domains, etc, are required to be shared as determined by the Trustees a backup to prevent loss of ownership.</p>



Category of Personal Data	Technical and Organisational Security Measures	Notes
Religious Belief (Application Form)	As per All Data	As per All Data
Health (Declared by Individual/Parent)	As per All Data	As per All Data
Health (Treatment given on Site)	Lead First Aider keeps a record of all treatment given on site and records any accidents. These are in paper form.	<p>Treatment includes use of prescription medication sent with Campers, plus any ad hoc treatment given to any individual such as use of paracetamol or other medication or examination, all of which are recorded on a specified paper form. Includes use of paper Accident Book.</p> <p>Completed forms and Accident Book (when completed) are returned after Camp and stored securely with Camp documentation at the nominated address.</p>
Visual Images (Legitimate Interest)	As per All Data	Photographs taken for identification purposes are stored on a SD card inserted into a digital camera. Persons responsible for on site registration are to ensure the security of the camera/card at all times, and other persons are not permitted access to them, except as described in this Policy.
Visual Images (Consent)	Visual images are taken with consent by appointed photographers.	Camp photographs are stored on G Suite and the Data Protection Lead will assign access to them in accordance with the Safeguarding Policy, using tools available in G Suite that permit control of access.
Financial Details	Financial details are contained in the details of bank transfers, bank statements, cheques, paying in books, gift aid forms, invoices, receipts, and accounting records designed by the Treasurer and	<p>As per All Data, plus the following:</p> <p>Cheque books and paying in books are retained at all times by accounting volunteers, with one set being assigned to each Camp. Images of these are taken by the Treasurer and are stored on G-Suite with the accounts for the applicable year.</p> <p>Bank statements, which include details of bank transfers and cheques are downloaded from internet banking onto G-Suite. Where a paper</p>



Category of Personal Data	Technical and Organisational Security Measures	Notes
	accounting volunteers (such as receipts books and cash books and ad hoc records of payments made and received and documents created during the preparation of the accounts)	<p>passbook is used, the passbook is retained by the person who last had need of it until it is required to be used again.</p> <p>Financial details are retained and processed by accounting volunteers until passed to the Treasurer for preparation of the Annual Accounts. The Treasurer stores paper based data securely at his/her address. All electronic data is stored on G Suite.</p>
Age	As per All Data	As per All Data.
Membership Status	As per All Data	As per All Data.
Training Record	As per All Data	As per All Data
Health	As per All Data	As per All Data
Religious Belief (Membership Form)	As per All Data	As per All Data
Criminal Conviction and Offence. (Self-declaration)	As per All Data	As per All Data
Criminal Conviction and Offence. (DBS Certificate Information)	As per All Data	<p>As per All Data, and additionally:</p> <p>Data is initially supplied by the individual himself/herself to the umbrella organisation (Options for Change or CCPAS). It is only when the data is provided to Frontier Camps that it is governed by this policy.</p>
Criminal Conviction and Offence (Alleged Abuse)	Allegations of abuse will be dealt with by the Safeguarding Children Office in accordance with the Safeguarding Policy, and will NOT be placed in G Suite. The SCO will preserve any records of alleged	Relevant, generalised, and anonymised data may be retained for the purposes of learning lessons and for ensuring that procedures can be reviewed intelligently. Such data may be stored on G Suite.



Category of Personal Data	Technical and Organisational Security Measures	Notes
	abuse only until they have been passed to the authorities. Copies will not be made.	
Referee Details	As per All Data	Reference Forms are normally provided in paper form or scanned. Reference forms will be retained with application forms and uploaded to G Suite.

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APPENDIX B

'Privacy Notice' (Information to be provided when Personal Data is collected from the Data Subject)

1. When personal data is collected from a person (a 'data subject'), the 'controller' (Frontier Camps) shall provide to the data subject, at the time of collection, with the following information:

(a) The identity and contact details of the data controller.

The Trustees of Frontier Camps

5 Grove Park
Liverpool
L8 0TL

admin@frontiercamps.com

(b) Reserved.

(c) The purposes of the data processing (ie the collection and the use of any data collected) for which the personal data is intended, as well as the legal basis for the processing.

(i) Legitimate Interest

The lawful basis for the processing of the following personal data is the legitimate interest of Frontier Camps.



Category of Personal Data	Purpose	Necessity. (The Legitimate Interest)
Name	<p>We need to know who is at Camp, for the safety of the children and young people (knowing where each child is at any time), and to know which adults are present and interacting with the children, ie all those on site and those carrying out specific roles related to the children. Necessary means of differentiating between people to allocate tasks and resources.</p> <p>Processed in order to be able to communicate with each person attending Camp. Processed in order to establish who is a Member of Frontier Camps.</p>	<p>Entirely reasonable and within the expectations of the children and their parents, as well as adult and young leaders. We all expect to be called by our name, and it is essential for organising Camp that names are processed.</p> <p>Necessary that the membership is established in order to conduct AGM and vote in accordance with the Constitution and the expectations of the Charity Commission.</p>
Role In Frontier Camps	<p>A role is allocated by Frontier Camps by the Trustees, Team Leader, and those who apply to attend Camp as Campers.</p>	<p>It is necessary to assign roles for the organisation of Camp, and for all attending Camp to be aware of who holds those roles at Camp.</p>
Address	<p>Processed so that Frontier Camps is able to communicate with those attending Camp, including the parents of children and young people attending Camp. Communications include Camper and Staff Handbooks to advise attendees of essential information.</p>	<p>Entirely necessary to communicate by post with those attending, and both reasonable and within their expectations to do so for the purposes outlined.</p>



Category of Personal Data	Purpose	Necessity. (The Legitimate Interest)
Contact Details	<p>Processed for the purposes of routine communication of essential information about Camp, and also in case of the need to communicate with/ask questions of parents of children and young people about their child, both before and during Camp, and to communicate in the event of an emergency.</p> <p>Processed to be able to communicate about Camp with adult volunteers and Members before, during and after Camp for its organisation, the arrangement of AGM and other meetings, to obtain feedback on Camp and for effective communication during Camp.</p>	<p>Necessary to be able to communicate essential information, and be able to communicate immediately with parents about a child or young person in cases of health or behavioural issues or in the event of an emergency. Fully within the reasonable expectation of those attending Camp and the parents of children.</p> <p>Necessary to be able to communicate with volunteers and Members in order to organise Camp and run the Charity.</p>
Date of Birth	<p>DoB processed for Campers to ensure they meet the required age range for which Camp caters, and used to organise Campers into tents. Shared with third parties as necessary to enable activity providers to ensure that children meet any age based restrictions.</p> <p>DoB processed for U18 volunteers to ensure they meet the age requirement to be a Junior Leader.</p> <p>DoB processed for Adult Leaders to ensure that Adult Leaders are over 18, and able to fulfil Camp's legal obligations.</p>	<p>Necessary to determine the age of Campers and U18 Volunteers to ensure they meet age related restrictions. Imposed by Camp.</p> <p>Necessary to process DoB of Adult Volunteers to ensure they are over 18 and able to act in the legal capacity of an adult.</p>
Experience of working with young people/qualifications	To use volunteers where they have experience and/or qualifications.	Improve how camp works. Encourage volunteers by using them in roles they wish to undertake and where they can contribute most. Improve the experience of Camp for young people.
Next of Kin/emergency Contact Details	Processed in order to be able to contact nominated person(s) in the event of an emergency	Camp must be able to inform NoK when a serious event occurs and the individual is incapable of making contact him/herself.



Category of Personal Data	Purpose	Necessity. (The Legitimate Interest)
Visual Images	To record who is on site during the week in the form of a close up facial shot and whole of Camp photograph, and to distribute the whole of Camp photograph to participants of the Camp.	The facial shot is necessary in the event of a missing person, to show to the police/authorities, to expedite the search. The whole of Camp photograph is a record of all persons on site as a permanent record of those who attended, and may be used to establish or defend a legal action.
Financial Details	To record who has paid, in relation to their, or their dependant's attendance at Camp and for the processing of gift aid forms.	Necessary to ensure that Camp collects all monies owed, in order to ensure its financial viability, and makes the most of its charitable status.
Gender	Processed to ensure that the number of male/female Campers does not exceed the accommodation available, and to ensure that sufficient adult volunteers of each gender are available to supervise each gender.	It is not possible to plan to ensure suitable accommodation and adequate supervision without knowledge of the gender of Campers.
Age	To ensure Campers meet the nominal age restrictions defined by Frontier Camps, and to allow Camp to decide on an appropriate age distribution of Campers in the available accommodation. To ensure the U18 Volunteers meet minimum age requirements, for the purposes of the maturity necessary to undertake junior leadership roles and to respond suitable to a working environment. To ensure that Adult Volunteers are over 18 years old.	There is an absolute legal age requirement for defining an adult. Camper and U18 Volunteer age limits are nominal are decided on a case by case basis, but knowledge of age forms a part of that assessment, and an individual's age may not be significantly different from the nominal range, as experience has shown that individual enjoyment is unsatisfactory when the age is significantly different.
Membership Status	To establish the membership of Frontier Camps for the purposes of complying with the Constitution and voting at membership meetings	It is necessary under the Constitution and charity law for Frontier Camps to hold AGM, and where necessary EGM, for the purposes of proper governance of the charity, at which decisions are taken, based on membership status.



Category of Personal Data	Purpose	Necessity. (The Legitimate Interest)
Training Record	To record training and assessment of adult volunteers for internal and legal compliance.	Frontier Camps needs to be able to show that adult volunteers are sufficiently knowledgeable and competent, to fulfil their roles safely and adequately, and within regulation.
Health	Ensuring continuity of healthcare while at Camp for those who need treatment (inhalers, medicine, behavioural health needs, etc). Ensuring the safety of those persons being treated and others (restricted access to medicines, suitable supervision). Enabling Frontier Camps to assess risk in relation to those attending at Camp, their state of health and the activities undertaken, and for third party activity providers to be able to do the same. To enable Frontier Camps to ensure that adequate provision is made for health needs and to do all that is reasonable to cater for diverse health requirements, in order to encourage inclusion.	Necessary to protect the health of those at Camp and to ensure inclusion. Necessary to ensure the safety of those at Camp by enduring that access to medicines is properly controlled and administered only to those for whom it is prescribed.
Religious Belief	Constitutional requirement of the Frontier Camps charity.	Necessary to ensure that the primary driving force of the charity remains Christian outreach, and that its decision making is grounded in Christian philosophy.
Referee's Details	To obtain references for adult volunteers and U18 volunteers in order to ensure their suitability for roles, as part of the recruitment process and Safeguarding Policy.	Necessary to process a referee's details as part the recruitment process and to retain for evidence of policy and best practice recruitment methods.

(ii) Consent

The lawful basis for the processing of the following personal data is consent:



Category of Personal Data	Purpose. (Why is the data being collected?)
Images	Collected for promotional purposes. Images may appear on the Frontier Camps website, or in its annual Newsletter, or other official communications authorised by the Trustees or an Officer of the Frontier Camps charity.

(iii) Legal Obligation

The lawful basis for the processing of the following personal data is legal obligation.

Category of Personal Data	Purpose. (Why is the data being collected?)
Criminal Conviction and Offence	Legal obligation for all adult volunteers to undertake a DBS check for work in a regulated activity, and for Frontier Camps to be able to take appropriate decisions in accordance with its Safeguarding Policy to ensure the safety of all at Camp, and in particular children and young people.

(d) The legitimate interests pursued by the controller or the third party when legitimate interest is the legal basis for processing data.

See para (c)(i), above.

(e) Recipients or classes of recipients of the data subject’s personal data.

(i) Personal Data is shared internally according to the Frontier Camps Data Protection Policy on a ‘need to know’ basis with the following persons.

With Whom Shared?	What is Shared?
Trustees	Any data required for the Trustees to fulfil their legal duties
Team Leader	All personal data
On Site Leader	All personal data
Lead First Aider	Identity and Health data
Application Processors	All personal data
On Site Registration	All personal data



With Whom Shared?	What is Shared?
Official Photographer(s)	Images
Lead Cook	Identity, Dietary and Allergy data
Tent Leaders	Relevant data relating to Campers in their Tent, including Identity and relevant Health data
Data Protection Lead	All personal data if a request is made for release of data by the person about whom the data is held
Safeguarding Children Officer	Relevant data relating to any alleged abuse
Other Adult Volunteer and U18 Leaders	Only data relevant to conducting an assigned role, primarily Identity data

(ii) Personal Data is shared externally according to the Frontier Camps Data Protection Policy on a 'need to know' basis with the following persons:

With Whom Shared?	What is Shared?
Activity Providers	Basic Identity data, age, height and limited Health data (only where this is necessary as part of the provider's own safety processes), or we share information about the impact of a disability/health condition, so that third party providers can ensure the safety of individuals during the service provision and make adjustments during service provision, to promote inclusion.
Healthcare Professionals	Identity and Health data
Financial and Legal Professionals	Identity and Financial data
Police Services	Any data required in cases of missing persons, criminal acts, or when obliged to release data
Government/Local Government Representatives	Any data required In cases of allegations of abuse (Social Services)
HMRC	Identity and Financial data, primarily gift aid declarations
Charity Commission	Anonymised reporting of accounts and charity performance, and any data required for reports of serious incidents, as required by the Charity Commission
Public Domain	When consent has been given to use images on the Frontier Camps website for promotional purposes



2. In addition to the information referred to in para 1, the controller shall provide the data subject with the following information, at the time the personal data is collected:

(a) The period for which personal data will be stored, or if that is not possible, the criteria used to determine the period.

Category of Personal Data	Envisaged Retention Period	Notes
Name, Role in Frontier Camps, Whole of Camp Photograph, Gender, Age (at time of Camp)	50 years	Data retained as evidence of all persons attending Camp, in case of future need to provide such evidence.
Record of the Issue of a Disclosure and Barring Service Certificate	50 years	Record of the date of issue of a DBS certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificate and the details of the recruitment decision taken.
Address, Contact Details, Date of Birth, Experience of Working with Young People/Qualifications, Next of Kin, Financial Details, Membership Details, Religious Belief, Training Record	6 years	Needed to tie in with accountancy practices, including gift aid requirements for HMRC, Annual Report and Accounts for Charity Commission, Governance of the Charity (Right to be a Member and to Vote).
Health	3 years	
Visual Images (Facial)	1 year	Facial image of each person at Camp is retained for security and safety, and is erased prior to the next year's Camp.
Criminal Conviction and Offence (Self-declaration & DBS)	6 months	Information contained within a DBS certificate retained for no longer than 6 months from the date a recruitment decision is taken, in line with DBS guidance. However, certain information is permitted to be retained for longer. See above.
Criminal Conviction and Offence (Alleged Abuse)	Until given to Social Services and reported to Charity Commission	Anonymised data may be retained if the abuse is alleged against Adult Volunteers or U18 Volunteers at Camp, so that Camp may review lessons learned and improve its recruitment procedures.



Category of Personal Data	Envisaged Retention Period	Notes
Visual Images (Promotion)	No retention period set	Images processed by consent will be used in Newsletters and on the Frontier Camps website, which after they are distributed, Frontier Camps no longer controls the data.
Referee Details	See Notes	Until a new personal reference is obtained, or 6 years, whichever is the later.

(b) The existence of the right to request from the controller access to, rectification or erasure of personal data, or restriction of processing concerning the data subject, or to object to processing, as well as the right to portability.

To exercise any of your rights, contact Frontier Camps at the address or email given above.

(i) Access to Personal Data.

You have the right to access all personal data that we hold about you.

(ii) Right to Rectification.

You have the right to have any data we hold about you corrected without delay, if it is in error, and for any incomplete data to be made complete.

(iii) Right to Erasure.

You have the 'right to be forgotten', and for your personal data to be erased without undue delay under certain conditions. You may ask for the personal data we hold about you to be erased when we no longer require it for its original purpose, or when we have asked you for your consent as the lawful basis of processing your personal data and you withdraw your consent, or when you object to the processing of your data when the legal basis for the processing is our legitimate interest, but only if we cannot demonstrate that our legitimate interests override your interests, or if your personal data has been processed unlawfully.

(iv) Right to Restriction of Processing



You have the right to ask us to restrict the processing of your data. This means that, apart from storage of the data, we may only process your data with your consent, with certain exceptions explained in the Frontier Camps Data Protection Policy. You may ask us to restrict the processing of your data, if you contest the accuracy of the data we hold about you, or the processing of the data we hold about you is unlawful, but you do not wish us to erase the data, or we no longer need to process the data we hold about you, but you wish us to retain the data so that you can use it in a legal claim, or you object to the processing of the data we hold about you pending a decision about whether or not Frontier Camps' legitimate interests override your interests.

(v) Right to Object

You have the right to object to Frontier Camps processing the data we hold about you, when the lawful basis of our processing is described as legitimate interest. You will see that most of the data we process is done so under legitimate interest. If you object, we will have to demonstrate that Frontier Camps' legitimate interests override yours

(vi) Right to Portability

When you have supplied personal data to Frontier Camps in an automated format, ie an electronic application form, and when we have asked you to give consent for the processing of the data you have provided, then you have the right to ask for the data to be provided to you or to another organisation in a portable format. If you make a request for data portability, the information will be supplied in a spreadsheet format such as CSV.

- (c) Where the lawful basis of processing is consent, the right to withdraw consent at any time, without affecting the lawfulness of data processing based on consent before its withdrawal.

When the lawful basis of the processing of your personal data is consent, you have the right to withdraw your consent at any time. However, if you withdraw your consent, that does not affect the lawfulness of the processing of your data that took place while your consent was in place.

- (d) The right to lodge a complaint with the ICO.

You may complain at any time to the Information Commissioner's Office if you are not satisfied with the way that Frontier Camps is processing your data. See <https://ico.org.uk/make-a-complaint/> or call 0303 123 1113.



(e) Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as the data subject is obliged to provide the personal data and of the possible consequence of failure to provide such data.

The provision of personal data to Frontier Camps is required in order to safeguard the legitimate interests of Frontier Camps, and failure to provide the data requested will mean that you or your child will not be able to attend Camp or take part in Camp activities.

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