

**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](mailto: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.

<b>Category of Personal Data</b>	<b>Purpose</b>	<b>Necessity. (The Legitimate Interest)</b>
Name	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.	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. 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.
Role In Frontier Camps	A role is allocated by Frontier Camps by the Trustees, Team Leader, and those who apply to attend Camp as Campers.	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.
Address	Processed so that Frontier Camps is able to communicate with those attending Camp, including	Entirely necessary to communicate by post with those attending, and both reasonable



Category of Personal Data	Purpose	Necessity. (The Legitimate Interest)
	the parents of children and young people attending Camp. Communications include Camper and Staff Handbooks to advise attendees of essential information.	and within their expectations to do so for the purposes outlined.
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.



Category of Personal Data	Purpose	Necessity. (The Legitimate Interest)
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.
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



Category of Personal Data	Purpose	Necessity. (The Legitimate Interest)
		charity, at which decisions are taken, based on membership status.
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:



<b>Category of Personal Data</b>	<b>Purpose. (Why is the data being collected?)</b>
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.

<b>Category of Personal Data</b>	<b>Purpose. (Why is the data being collected?)</b>
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.

<b>With Whom Shared?</b>	<b>What is Shared?</b>
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
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

With Whom Shared?	What is Shared?
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.



Category of Personal Data	Envisaged Retention Period	Notes
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.
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.

FINAL DRAFT