

# GRACE BAPTIST MINISTRY TO THE YOUNG (also known as Pioneer Christian Camp)

## DATA PROTECTION POLICY

### INTRODUCTION

This is the Data Protection Policy for Grace Baptist Ministry to the Young (also known as Pioneer Christian Camp).

In order to operate, Camp is required to collect and use certain types of information about the individuals with whom they come into contact. Personal data relating to identifiable living individuals must be collected and dealt with appropriately whether collected on paper, stored on a computer database, or recorded on other material. There are safeguards to ensure this under the Data Protection Act 2018.

This Policy

- confirms the principles for managing data (Sections 1 & 2)
- identifies specific areas of work where data is to be managed (Section 3)
- allocates responsibilities for compliance with this Policy (Section 3)

### SECTION 1 - DEFINITIONS

The Organisation – Grace Baptist Ministry to the Young (also known as Pioneer Christian Camp)

The Trustees – The Committee

#### Definitions under the Data Protection Act

**Data** means information which –

- (a) is being processed by means of equipment operating automatically in response to instructions given for that purpose,
- (b) is recorded with the intention that it should be processed by means of such equipment,
- (c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,
- (d) does not fall within paragraph (a), (b) or (c) but forms part of an accessible record.

**Personal data** means data which relates to a living individual who can be identified –

- (a) from those data, or
- (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

**A data controller** is anyone who will either individually or jointly with other persons determine the purposes for which, and the manner in which, any personal data is to be processed. Any governing body of trustees would become a data controller. This would apply to the Trustees of the organisation.

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### Duties - Scope

Duties under the Act apply throughout **the period** when you are processing personal data – as do the rights of individuals in respect of that personal data. You must comply with the Act from the moment you obtain the data until the time when the data has been returned, deleted or destroyed.

Duties extend to the way you **dispose** of personal data when you no longer need to keep it – you must dispose of the data securely and in a way, which does not prejudice the interests of the individuals concerned.

### SECTION 2 – DATA PROTECTION PRINCIPLES

All organisations must comply with the Data Protection Act and its provisions. Schedule 1 to the Data Protection Act lists the data protection principles in the following terms:

1. Personal data shall be processed fairly and lawfully.  
In practice this means that you must:
  - have legitimate grounds for collecting and using the personal data;
  - not use the data in ways that have unjustified adverse effects on the individuals concerned;
  - be transparent about how you intend to use the data, and give individuals appropriate privacy notices when collecting their personal data;
  - handle people's personal data only in ways they would reasonably expect; and
  - make sure you do not do anything unlawful with the data.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes. This requirement aims to ensure that organisations are open about their reasons for obtaining personal data, and that what they do with the information is in line with the reasonable expectations of the individuals concerned.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

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### SECTION 3 – COMPLIANCE WITH THE DATA PROTECTION ACT

#### Responsibility for Data Protection Policy

The Secretary is responsible for drafting the Policy and its implementation. The Trustees are required to approve the Policy and review it at regular intervals, at least once a year.

#### People covered by this Policy

The Trustees are to comply with this Data Protection Policy. Each Trustee is to be issued with a copy when the Policy is approved and new Trustees are to be issued with a copy when they are appointed.

Under the Policy Trustees are required to be aware of and comply with the requirements of the Data Protection Act in the obtaining, storage, use, and disposal of personal data. These requirements are summarised in the Data Protection Principles in Section 2 of this Policy.

#### Lines of reporting

If anyone has any concerns about data protection issues, they should raise them at the earliest opportunity with the Secretary, or in his/her absence, the Chairman. The Secretary will co-ordinate all such concerns and report them to the Trustees with details of any remedial action taken or to be taken.

#### Risk Management

Risks are assessed and managed through the risk register which is reviewed and reported on an annual basis.

#### Procedure for breach of policy

Any breach of Data Protection requirements is to be reported to and investigated by the Secretary, reported to the Trustees as appropriate, and corrective measures implemented. Any serious breaches may need to be reported to the Information Commission.

#### Personal data held

There are a number of main areas where personal data is held on behalf of the organisation. All original records are held by the Secretary but can be shared with other key personnel as listed in **Storage of Data** below. Electronic records are stored initially in a password protected folder on a personal home computer, access to which is also password protected, but after camp each year they are transferred to an encrypted hard disc stored at a separate location. This hard disc is also password protected. Paper copies are stored in a locked filing cabinet. These are:

- Emails confirming status of DBS Certificate issued by Disclosure Services – for 6 months after use
- Registration Records (electronic) – to be archived on Brushfire for 6 months after use and then deleted
- Contact details (electronic)
- Medical Records (paper and electronic)
- Dietary Records (paper and electronic)
- Incident Book (paper)
- Accident Book (paper)

Staff responsible for these areas are responsible for ensuring personal data is adequately protected and that they understand their own responsibilities in following procedures. Where procedure notes exist, they should include reference to the data protection safeguards to be followed.

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### Protection of Personal Data

- Paper records should be kept in a locked cabinet to be accessed only by the person with responsibility for the records;
- Electronic records should be stored on an encrypted password protected hard disc to be accessed only by the person with responsibility for the records or on the online booking portal (Brushfire);
- All personal data relating to staff and campers is held by the Secretary in accordance with the details above and any data held will be shared in accordance with the details below:

### Storage of Data

- All personal data received by the Secretary will be stored in accordance with the Protection of Personal Data mentioned above;
- Names and church details may be passed to other members of the camp staff who have an identified need for use of the information i.e. tent lists, team lists etc;
- Contact details (telephone numbers/email addresses) for staff and campers may be shared with:
  - The Skipper
  - The Medical Officer (for emergency details)
  - The Safeguarding Co-ordinator/Deputy (if required)
- Dates of birth and age details may be shared with:
  - The Skipper
  - The Medical Officer (for emergency details)
  - The Safeguarding Co-ordinator/Deputy (if required)
  - All staff as required
- Medical Information may be shared with:
  - Trustees
  - The Skipper
  - The Medical Officer (for emergency details)
  - Tent Leaders and Sports Team Leaders (where appropriate)
- Dietary Requirements may be shared with:
  - The Skipper
  - The Catering Officer/Cook
- Special Needs/Safeguarding Requirements may be shared with:
  - The Skipper
  - The Safeguarding Officer/Deputy
  - The Medical Officer
  - Tent Leaders as appropriate

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- Safeguarding Issues may be shared with:
  - The Safeguarding Co-ordinator or Deputy
  - The Medical Officer (where appropriate)
  - Police, Local Authorities as appropriate
  - Chairman and Trustees if applicable
- Church Locations may be shared with:
  - The Skipper
  - The Safeguarding Officer/Deputy
  - Tent leaders as appropriate.

Personal contact details (telephone numbers and email addresses) for staff and campers **MUST NOT** be passed to other staff or campers without permission. For campers, this permission **MUST BE** in writing from the parent/carer. If permission is given, the email address to be used should be generic e.g. [staffname@pcc.co.uk](mailto:staffname@pcc.co.uk) and not a private email address.

Group emails sent to staff or campers **MUST BE** blind copied (bcc) on all occasions and where possible should only be sent out by the Secretary or the Skipper.

Following the completion of camp all application forms, medical consents and recommendations will be retained in accordance with the Archiving Policy.

### Safeguards in place

There are a number of safeguards and facilities in place to enable Trustees to manage data protection issues.

- Shredder for disposal of paper records
- Security of office and archive store
- Trustees' own anti-virus software on personal computers

Trustees are encouraged to propose any additional safeguards to improve the security of personal data. These should be communicated to the Secretary in the first instance.

### Policies for deleting data

An archiving policy has been developed and agreed by the Trustees which will include periods of retention and methods of disposing of data.

### Registration with Information Commission

Grace Baptist Ministry to the Young (also known as Pioneer Christian Camp) is registered with the Information Commission under reference ZA239271

The address of the Information Commission is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

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**DATA PROTECTION POLICY**

**Annual Review**

The foregoing policy and arrangements will be reviewed at least annually by the Trustees. Any changes must be confirmed in writing.

Date of issue:



Signed .....

**Chairman**

**Dated: 05/10/2023**