

GRENVILLE HOUSE OUTDOOR  
EDUCATION CENTRE

DATA  
PROTECTION  
POLICY / GDPR

FEB 2024

## **General**

Grenville House Outdoor Education Centre (GHOEC) is committed to protecting the rights and privacy of individuals, including resident and non-resident groups, staff and others, in accordance with the General Data Protection Regulation (GDPR) which came into force in May 2018.

The new regulations demand higher accountability in how personal data is managed and used. It also allows new rights for individuals to understand and control that use. The GDPR contains provisions that GHOEC is aware of as a data controller, including the provisions designed to protect personal data.

GHOEC needs to process certain information about its staff, groups, Trustees etc and other individuals with whom it has a business relationship for various purposes such as, but not limited to:

1. The recruitment and payment of staff, both on a regular and freelance basis.
2. The administration of booking school residential trips, non-residential activities and room hire and liaising with staff / individuals from those schools or groups in order to do this.
3. Trustee selection and enrolment.
4. Collecting payments from our clients.
- 5 Complying with legal obligations including HMRC etc as to the length of time such records are kept.

To comply with all legal obligations, including the obligations imposed on it by the General Data Protection Regulation (GDPR) GHOEC must ensure that all of this information about individuals is collected and used fairly, stored safely, securely and not disclosed to any third party unlawfully.

## **Compliance statement**

The policy applies to all staff, both regular and freelance, and any breach of this policy will be considered a disciplinary offence.

We do not share any personal information with external bodies except for when we are legally obliged to do so. For example, the required information is provided to HMRC, Charity Commission and Companies House amongst others.

This policy will be updated as and when any changes or amendments to the legislation occur.

## **General Data Protection Regulation (GDPR) 2018**

This legislation came in to force on the 25th May 2018 and regulates the processing of personal data. It protects the rights and privacy of all living individuals, including children. All individuals who are the subject of personal data have a general right of access to the personal data which relates to them and they can exercise the right to gain access to their information by means of a subject access request. This data may be in hard or soft copy (paper or manual files, electronic records etc.) This free of charge although a fee may be charged for this request to cover staff time etc needed to obtain the information in exceptional circumstances. The information or a response requesting up to 2 months additional time must be provided within 1 month.

## **Our responsibilities**

GHOEC will act as the 'data controller' which means it is responsible for controlling the use and processing of personal data.

GHOEC appoints Kurt Mockridge, the Centre Director to act as its Data Protection Officer who will be responsible for all day-to-day data protection matters and will ensure that all members of staff adhere to this policy.

GHOEC will ensure that it only processes personal data in line with the following guidance provided by the Information Commissioner's Office (ICO) :-

- 1) Process all personal data fairly and lawfully.
- 2) Process the data for the specific and lawful purpose for which it collected that data.
- 3) Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed.
- 4) Keep personal data accurate and, where necessary, up to date.
- 5) Only keep personal data for as long as is necessary.
- 6) Process personal data in accordance with the rights of the data subject under the legislation.
- 7) Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.
- 8) Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

For further information, please refer to [www.ico.org.uk](http://www.ico.org.uk)

## **Consent**

Any schools, groups and individuals who contact GHOEC in order to use its services will be deemed to have provided consent for us to use their email/contact details in order to further the booking or enquiry. All information provided will only be used for this purpose.

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