



# Data Protection Policy

## Surrey Special Needs Ski and Outdoor Learning Charity (SPENSOL)

Last reviewed	September 2024
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### Definitions

<b>Charity</b>	SPENSOL a registered charity, charity number1165674.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means the nominated trustee of the charity – identified in the Privacy Notice

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and

organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## 2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain clear procedures for processing data.
- b. These procedures shall be reviewed at least annually.
- c. All trustees shall be aware of and follow these procedures.
- d. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

## 4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis/](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis/)).
- b. The basis for the charity to process personal data for the annual ski trip is legitimate interest.
- c. We will also seek consent for taking and using film and photographic images. Where this consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data. Individuals have the right to revoke that consent as far as this is reasonably practicable.
- d. We will also seek consent to share personal data with our major funder, Surrey Short Breaks for Disabled Children. Again, evidence of opt-in consent shall be kept with the personal data. Individuals have the right to revoke that consent as far as this is reasonably practicable.

## 5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Information on medical needs and other issues necessary to ensuring the safety of participants on the annual special needs ski trip will be shared with other responsible

adults who will need to know this information. These will include, but not necessarily limited to, ski instructors from the ski school, SPENSOL ski leaders, nurses and volunteers with specific care or safety roles.

- c. Data will be shared with Surrey Short Breaks for Disabled Children, which helps fund these annual trips and which has its own robust data security systems.

## 6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## 7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## 8. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>).

END OF POLICY