

North Mymms Youth Project Data Protection Policy

BACKGROUND

This policy sets out the Project's commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

North Mymms Youth Project collects and records personal data about its members and their parents, including names, addresses, other contact details, members' health needs, activities attended etc. This information is used to allow the project to keep in touch with its members/their parents, to plan events and to carry out activities safely.

Recording and use of personal data in this way is covered by the Data Protection Act and by the UK General Data Protection Regulation (GDPR) requirements. The project is committed to meeting its legal obligations as set out in that legislation. In line with this we will observe the following:

General data usage

- We will only collect and use data fairly and lawfully
- We will only process personal data to meet our operational needs or fulfill legal requirements
- We will take steps to ensure that personal data is up to date and accurate
- Members / parents are able to access their own day-to-day online records and are encouraged to notify the project of any information which requires update.
- Members or their parents are entitled to see the data we hold about them and to correct any inaccuracies.

Data storage and security

- We will seek to avoid unnecessary retention of personal data.
- Data relating to club membership, helpers and activities will be stored in secure, online folders with access restricted to the Chair and those officers of the club who have a need to access this data. Such online folders will always be accessible to at least two officers, including the Chair.
- Leaders are expected, wherever practicable, to access this information in its online location, where the information is most likely to be secure and up to date. The downloading or onward sharing of this information must be limited to circumstances where this is necessary for the smooth running of the Project. In these cases the leader is responsible for maintaining the security of the data.
- For security reasons, hard-copy storage of personal data will be restricted to the minimum necessary for day to day operational purposes. Any such documents must be kept in the personal care of the officer concerned or in a

secure place and securely destroyed when no longer required or digitized for future use if not immediately required.

Information governance

- We will have a nominated officer responsible for data protection compliance and provide a point of contact for all data protection issues
- We will ensure that all project officers and leaders are made aware of good practice in data protection
- Officers responsible for personal data will receive appropriate instruction on maintaining data safely
- Everyone handling personal data will be informed of where to find further guidance
- We will ensure that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly
- The nominated data officer will maintain and share with the chair a record of the location / holders of all project data, including any media owned by the project, and the membership of online folders.
- The appropriateness of data protection procedures and guidelines within the project will be reviewed by the management committee at least bi-annually.

PERSONAL DATA

Members register

A register of members is maintained by the leaders, containing names, addresses and parental/guardian contact details of all young people registered with the project or on the waiting list, as supplied by parents on the application form or in subsequent updates. This register also contains essential health information such as allergies, illnesses which might result in emergency, eg epilepsy, and information about any special dietary requirements.

A register is also maintained of all members' attendances at project activities. This register is securely retained indefinitely in order to allow investigation of any safeguarding concerns that may subsequently be raised.

At the start of every term, parents confirm that the key contact information we hold for them is up to date as part of the membership renewal process.

Helpers data

A register is maintained of attendance of parental and other helpers.

In addition to the basic contact details held about all parental helpers, all regular helpers are asked to supply details of any relevant health conditions. This information is held electronically and made available to leaders as required.

Regular helpers are required to submit additional disclosure information and references as part of the recruitment process. This information is held securely by the Safeguarding Children Officer and/or Secretary and may be made available to the Chair in the event of any concern. A record of DBS clearance, comprising the clearance number and date of clearance, is held by the DBS checker and the Chair.

Data relating to attendance of helpers at Club events is securely retained indefinitely in order to allow investigation of any safeguarding concerns that may be raised at any subsequent date.

Other Data relating to previous members and their parents

Contact data relating to past members / parents of past members is retained for promotional purposes, as these members / parents may be interested in continuing to support the project through fundraising or volunteering. Any contact made with previous members, or their parents will include an invitation to the persons concerned to request removal of their data from this list and any such requests will be immediately actioned.

PHOTOGRAPHS AND VIDEO

This section of the policy has been developed within the framework provided by the NSPCC guidance on “Photographing and Filming Children” and the associated model policy. <https://learning.nspcc.org.uk/online-safety/photographing-filming-children>

The term photography here covers any moving or still image, taken and stored by any technology including mobile phones and CCTV.

Photographs are regularly taken as part of project activities. These are used

- to assist in identification,
- to provide a record of club activities,
- to include in promotional materials
- to allow a personal memento of activities for members and their families

Photography is undertaken by leaders or by other helpers with the permission of leaders and the resulting photographs will be managed by the project as set out here. All photographs taken during an activity must be forwarded to the Leader responsible for the activity and then immediately deleted from personal phones or cameras. Parents may retain pictures which only include their own children. Other photography, whether by adults or children, is not allowed during project activities.

Consent for photography

When a young person is registered with the project, their parent's permission is sought for the young person to be included in photographs for any of the above purposes. (If the parent does not give such permission, an appropriate way forward will be agreed in discussion with the parent and the member.) No member is required to be included in any photograph if they do not wish.

Identification

Unless the parent or member requests otherwise, a facial photograph of each member is held as part of their registration details, to assist in identification. These images are tagged with the patient's first name and surname initial. They are available during meetings to assist in identification and may be printed out for use by leaders taking members on specific activities, in which case they will be destroyed after the event.

Other uses

Images and videos of members used in publicity materials or included in project archives will not be identified by name, unless, exceptionally, the written permission of the parent has been obtained.

Photographs of members participating in activities are regularly included in newsletters and on the public pages of the project website. Videos are also used as part of our annual review films which are placed on social media.

Other photographs are made available for parents to review or download via password protected archives on the club website or in other formats (e.g. YouTube, printed pictures etc). Parents are only allowed to download pictures which include their own children.

Removal of photographs from the archive and from online sites

If any parent or member requests the removal from the archive or an online site of any image of that member, this request will be honoured. Any request to remove images relating to any other person or event will be reviewed by the Chair and an appropriate way forward agreed and documented.

Unless deleted at the request of parents, archive material will normally be retained during the period when the members concerned could be expected to retain membership of the project. After that period, it may be deleted.

Some images from each year group will be retained over time both in the archive and on the Project's website and online media to form part of the project's ongoing record of its activities and development.

Any photographs which for any reason are not included in the archive or which are removed from the archive will be deleted unless retention is specifically approved by the Chair.

Sharing of photographs and other personal data via social media

The project uses has its own social media accounts, which are managed in line with the principles set out above. Access to these social media accounts are restricted to parents of children attending the project, and to project members aged 13 and over with the exception of our public YouTube channel which is assessable to everyone.

Responsibility for policy

The management committee and leaders of the project are responsible for ensuring that this policy is followed and for monitoring compliance over time. Any concerns about the matters covered in the policy must be referred to the Chair who will discuss with other committee members as appropriate.

If it appears that a data breach has occurred that may require reporting under the EU General Data Protection Regulation (GDPR) requirements, this reporting will be agreed by the Chair and undertaken by the Data Protection Officer.

Signed

Date

Approved by Management Committee
Most recent review
Next Review

AGM December 2015
September 2024
September 2026