

**Date Prepared: 15.11.2021**

**Date Reviewed: 21.02.2023**

## **Privacy Notice (for Young People, Parents and other Visitors)**

You need to be aware of this Privacy Notice if you are providing personal information to Swindon operated Plas Pencelli Outdoor Education Centre. This privacy notice explains how personal and confidential data about you or your dependants is collected, used and shared. Plas Pencelli will process your personal data in accordance with the Data Protection Act 2018. This Privacy Notice will be updated from time to time. Please visit the centre website ([www.plaspencelli.co.uk](http://www.plaspencelli.co.uk)) to access the most updated version.

### **Categories of Information Collected, Held and Shared Include:**

- Name
- Contact Details (address, email address, telephone number/s)
- Date of Birth
- Medical Information
- Emergency Contact
- Whether you have a Disability for which we can make Reasonable Adjustments
- Dietary Information
- Water Confidence
- Special Educational Needs
- Behavioural Information
- Other Personal Needs (such as emotional or physical)
- Attendance Information (such as days attended and reason for early departure)
- Opinions on your visit (from personal comments, staff feedback and review forms)
- Guarantor (if you are acting for another person, such as a child under the age of 16)

### **How we collect this information:**

- via our individual information form or Individual course application form
- in liaison with schools, other organisations or personally before the visit
- in person during your stay at Plas Pencelli
- via feedback responses

### **Why we collect and use this information:**

- to effectively risk assess activities during the planning stage
- to help ensure safety during activities (selecting appropriate venues for example)
- to take appropriate precautions (such as bringing along an inhaler for asthmatics)
- to make suitable adjustments to best accommodate individuals
- to react appropriately in emergency situations
- to support learning
- to monitor and report on progress
- to provide appropriate pastoral care

- to assess the quality of our services
- to comply with the law regarding data sharing
- for business to business marketing where there is a relevant and appropriate relationship with a customer.

### **The lawful basis on which we use this information:**

We collect and use personal information under the following lawful basis:

- that it is necessary to provide the **contracted** level of services
- that there is a **legal obligation** to be able to effectively discharge a duty of care particularly for young people
- that there is a **vital interest** as personal data is required to help protect life
- That there is a **legitimate interest** in processing your data
- That there is a **legitimate interest** for marketing our service to relevant education professionals
- that processing of special category data is necessary for reasons of **substantial public interest** as it is necessary to protect the physical, mental and emotional wellbeing of individuals including those under the age of 18.

Your personal data is used to allow a good and safe level of service to be delivered at Plas Pencelli within the standards set by the Adventure Activities Licensing Regulations 1996.

### **The collecting and processing of your personal information enables Plas Pencelli:**

- to allow you access to the buildings and site
- to provide and administer outdoor education services for you and to any person, such as children under 16, for whom you are a guarantor. This includes providing outdoor activities, providing transport to and from activity sites, supervising on-site evening activities, overseeing eating and sleeping arrangements, facilitating staff meetings, supporting young people, in particular, in day to day living and providing on site and off-site training events.
- to respond to your enquiries
- to ensure that we are providing services that are needed and relevant to you
- to ensure there is continuous improvement to the service at Plas Pencelli
- to detect and help prevent crime and to protect centre staff and users

### **Collecting your information:**

There is a contractual obligation to provide personal data to Plas Pencelli as it is necessary for the safeguarding of all course participants and accompanying staff.

### **Change of purpose:**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we might need to use it for another reason that is compatible with the original purpose. If we need to use your personal information for any other unrelated purpose, we will always notify you and we will explain the legitimate basis which allows us to do so or ask for your consent.

**How do we store and protect your information?:**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees and third parties (named above) who have a business need to know when providing services to Plas Pencelli. All parties will only process your personal information on our instructions and in accordance with obligations under the Data Protection Act 2018.

### **Data Breaches:**

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **How long do we keep your personal information?:**

In broad terms, we will only retain your personal data for as long as is necessary for the purposes described in this Privacy Notice. This means that the retention periods will vary according to the type of the data and the reason that we have collected your data in the first place. We have procedures in place regarding our retention periods which we keep under review taking into account our reasons for processing your personal data and the legal basis for doing so.

### **The data you provide prior to and during a visit to Plas Pencelli:**

This data may be anonymised in the system and your information and feedback forms are destroyed within a month of your visit with the following exceptions:

- Where an accident or incident has happened all relevant personal data is retained to allow further investigation. This will normally be retained for 6 years or up until the individual reaches 25 years of age.
- The data we collect in the course of providing a service:
- Any personal information you supply to us in any correspondence initiated by you (email, letter, telephone) will be retained for the duration of the enquiry and will be securely destroyed and in line with our information security procedures
- Our systems will store your personal data for up to two years following your last contact with Plas Pencelli after which time it is deleted.

### **Who we share your information with**

We routinely share information with:

- centre staff that lead activities or prepare meals
- the schools of pupils attending after departure
- Swindon Borough Council
- The Plas Pencelli Management Committee
- Anonymised data with the Association of Heads of Outdoor Centres to conduct research or analysis producing statistics, information, advice or guidance
- the NHS where a visit to a hospital has to be made

### **Who else do we share your Information with?:**

We do not share information about you with anyone without consent unless the law and our policies allow us to do so. We share information about you with our local authority (LA) Swindon Borough Council. Any user who does not comply with the centre rules and regulations or the law should be aware that we may share your personal data, including images, with your visiting school or organisation, other Swindon Council departments or the Police.

### **Access to your Personal Data:**

Under data protection legislation, parents and pupils and other visitors have the right to request access to information about them that we hold. To make a request for your personal information contact the data protection officer (see below).

You also have the right to:

- obtain a copy of your data we process and store within our policy
- object to certain processing of your personal data such as that, that is likely to cause, or is causing, damage or distress
- request us to restrict the processing of your data in certain ways such as for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- withdraw consent for processing where that is the legal basis we use and be forgotten i.e. for your personal data to be removed from our systems and records under certain circumstances.
- claim compensation for damages caused by a breach of the General Data Protection Regulations

### **Requesting Access to your Personal Data:**

You have the right to ask for a copy of all the information we have about you and the services you receive from us. When we receive a request from you in writing, we will give you access to everything we have recorded about you, however, we cannot let you see any parts of your records that contain:

- confidential information about other people
- data a professional thinks will cause serious harm to you or someone else's physical or mental well-being
- if we think that giving you the information may stop us from preventing or detecting a crime

This applies to personal information that is in both paper and electronic records. If you ask us, we will also let others see your record (except if one of the points above applies). If you cannot ask for your records in writing please use the contacts below.

*If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Swindon Borough Council Data Protection Officer (see below).*

*Plas Pencelli Information Asset Owner at Plas Pencelli OEC*

*Pencelli, Brecon, Powys LD3 7LX email: [office@plaspencelli.co.uk](mailto:office@plaspencelli.co.uk) tel: 01874 665241*

or

*SBC Data Protection Officer at Swindon Borough Council, Civic Offices, Euclid Street, Swindon SN1 2JH email: [dataprotection@swindon.gov.uk](mailto:dataprotection@swindon.gov.uk)*

*If you remain dissatisfied with the way your personal data has been handled, you have the right to complain to the Information Commissioner's Office at [www.ICO.org.uk](http://www.ICO.org.uk) You may refer the matter to the Information Commissioner's Office whose contact details are Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF email: [casework@ico.org.uk](mailto:casework@ico.org.uk)*