

Practical Play Forest School Data Protection and Privacy Policy

Practical Play collects and uses personal information about staff, children, parents/carers, and other individuals who come into contact with the provision. This information is gathered to enable Practical Play to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the Forest School complies with its statutory obligations.

This Code of Practice has been issued to give guidance to the staff team, volunteers and any other person delivering services to customers/participants/beneficiaries of Practical Play, so that any data which Practical Play holds is stored safely, processed correctly and not unlawfully disclosed to any other person, and that such processing of data complies with Data Protection Law, namely the UK GDPR (2018) and its implementation of the UK GDPR Regulations 2018. Practical Play management and staff should also familiarise themselves with Practical Play's Data Protection Policy.

Practical Play's data protection officer is Emma Reeve (see contacts below).

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 2018 and other related legislation. It will apply to information regardless of how it is collected, used, recorded, stored, and destroyed and whether it is held in paper files or electronically, including via the secure digital reporting system used by Practical Play

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

What is Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, either on its own or when combined with other information held.

Application of this Code of Practice

This Code of Practice applies to "Personal Data", which is defined as: information (including opinions and intentions) which relates to an identified or identifiable natural person.

Identity

An "identifiable natural person" is an individual who can be identified, directly or indirectly, by information such as: a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological,

genetic, mental, economic, cultural, or social identity of that natural person. If, by looking solely at the information you are processing, you can distinguish an individual from other individuals, that individual will be identified (or identifiable). Identifiers are wide ranging, for example, a name or number, an Internet Protocol (IP) address or an image.

Sensitive Personal Data

Practical Play recognises that sensitive personal data (including "Special Category Data" as defined in Data Protection legislation) is likely to be very personal and may only be processed with the of a very personal nature and that it may only be processed with the * explicit consent of the individual concerned.

Practical Play treats the following information about a person as sensitive personal data:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade Union membership
- Physical or mental health or condition
- Genetic data

Biometric data
Sexual life and sexual orientation
Alleged or actual commission of a criminal offence

Examples of the type of sensitive personal data that Practical Play may hold include details of an individual's health, medication, physical needs and criminal convictions. Practical Play strives to collect, process, and hold only data that is necessary and appropriate for the Forest School to provide its services and comply with any contract or legislation. Staff team and volunteers working with participants should only request and process sensitive personal data that is specifically required in official forms, or directed by the lead practitioner in line with policy.

Data Protection Principles

Practical Play has adopted the following principles to govern its collection, use, retention, transfer, disclosure, and destruction of personal data.

Processes have been put in place at Practical Play (for example, the use of specific forms to capture participant information) to ensure compliance with appropriate legislation and these principles. The staff team and volunteers should ensure that they follow these processes and ask for clarification if in doubt.

Where information relates to a child attending as part of Alternative Provision, data will be shared securely and appropriately with the commissioning school and/or local authority in line with statutory duties.

Lawfulness, Fairness and Transparency

Personal data shall only be processed lawfully, fairly and transparently. This means Practical Play must tell participants what processing will occur (transparency), the processing must match the description given to the participant (fairness), and it must be for one of the purposes specified in the applicable Data Protection legislation (lawfulness).

Purpose Limitation

Personal data shall only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This means Practical Play must specify exactly what the personal data collected will be used for and limit the processing of that personal data to only what is necessary to meet the specified purpose.

Minimisation

Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes. This means Practical Play must not collect, process, or store any personal data beyond what is strictly required.

Accuracy

Personal data shall be accurate and kept up to date. (See below for More on keeping personal data up to date.)

Online Storage

Practical Play holds computerised files and folders on Oakline (an online booking platform). The secure online booking system is also used for recording incidents, making notes about sessions and holding medical/SEND information.

Limitation

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.

Integrity & Confidentiality

Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage.

Accountability

Each person responsible for personal data at Practical Play should be able to demonstrate compliance. This means they must demonstrate that the data protection principles are met for all personal data for which they are responsible.

Handling Personal data

Personal data should only be collected in accordance with questions on the appropriate online and hard copy forms approved for the processing of information.

Information collected from course participants manually at indoor or outdoor locations should always be kept out of sight of participants and stored in the filing cabinet in the home office at the end of the same working day.

Forest School staff and others working with participants should pass all completed participant paperwork to the Lead practitioner at the very earliest opportunity, who will ensure it is stored appropriately.

At no time should participant paperwork be left unsupervised during the working day or left unsecured during out-of-work hours.

Practical Play Images Policy

Where prior photography permission has been given photographs are sometimes taken to document and reflect on children's experiences at Forest School. These are not used for social media or marketing without specific, separate consent.

Images are stored securely and deleted once they are no longer required. Parental consent is obtained at the start of each session, and children are asked verbally before any photo is taken.

Media and social media: Under NO circumstances should photographs or videos be shared with the press, on our website, on social media, or in any other publication,

unless those involved have given written consent. Under NO circumstances should any other personal data be shared through social media.

Sharing personal data with third parties:

In some circumstances, we are required to share certain data with referring organisations or authorities. If identifying personal data is to be shared, you should check with the office administrator whether sharing is permitted and ensure any method of transfer is secure. (More on sharing personal data is below.)

Where data relates to a child attending as part of Alternative Provision, information will be shared securely with the commissioning school and/or local authority in line with statutory requirements.

Mobile phones, tablets, laptops, and other portable electronic data storage units:

Any portable device, whether owned by an individual or Practical Play, used for receiving, processing or sending any information containing personal data about the staff team, volunteers, participants, service users, family, friends or associates of those individuals, or any Practical Play supporters, donors, suppliers, contractors or consultants, should be secured and kept out of public view if left unattended (e.g. kept in a locked box in the locked shed). Access to the device should also be password protected.

Protecting personal data about course participants

In the course of their work, staff, volunteers, and associates may have access to personal information. This document outlines company policy regarding privacy and data protection.

Personal data that Practical Play may collect, use, store, and share (when appropriate) about children includes, but is not restricted to:

Contact details, contact preferences, date of birth, and identification documents.

Records

Characteristics or special educational needs

Exclusion information

Details of medical conditions, including physical and mental health

Attendance information

Safeguarding information

Details of support received, including care packages, plans and support providers.

Photographs

Practical Play may also hold data about children that has been received from other organisations such as schools, local authorities and the Department for Education.

Purpose

Practical Play uses this data to:

Support children/adults to learn

Monitor and report on progress

Provide appropriate care

Data Protection Principles

The Data Protection Act 2018 establishes eight enforceable principles that must be adhered to at all times:

Personal data shall be processed fairly and lawfully.

Personal data shall be obtained only for one or more specified and lawful purposes.

Personal data shall be adequate, relevant, and not excessive.

Personal data shall be accurate and, where necessary, kept up to date.

Personal data processed for any purpose shall not be kept for longer than is necessary to meet the specified purpose.

Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 2018.

Personal data shall be kept secure i.e., protected by an appropriate degree of security.

Personal data shall not be transferred to a country or territory outside the

UK or EEA unless that country or territory ensures an adequate level of data protection.

General Statement

Practical Play is committed to maintaining the above principles at all times.

Therefore, we will:

Inform individuals why the information is being collected and when it is collected.

Inform individuals when their information is shared, and why and with whom it was shared.

Check the quality and accuracy of the information it holds.

Ensure that information is not retained for longer than is necessary.

Ensure that when obsolete, information is destroyed and that it is done so appropriately and securely.

Ensure that clear and robust safeguards are in place to protect personal information from loss, theft, and unauthorised disclosure, irrespective of the format in which it is recorded.

Share information with others only when it is legally appropriate to do so.

Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests

Ensure our staff are aware of and understand our policies and procedures.

Complaints

Complaints will be dealt with in accordance with the complaints policy. Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator).

Review

This policy will be reviewed at least annually, or sooner if legislation or practice changes.

Contacts

If you have any enquiries in relation to this policy, please contact Emma Reeve Practical Play Forest School, 26 Tadley Hill, Basingstoke Hampshire RG26 3PW,, who will also act as the contact point for any subject access requests.

Further advice and information is available from the Information Commissioner's Office, www.ico.gov.uk or telephone 01625 545745 3

Rights of access to information

There are two distinct rights of access to information held by the Forest School about children.

Under the Data Protection Act 2018, any individual has the right to make a request to access the personal information held about them.

Parents/carers with parental responsibility have rights of access to their child's educational record under the Education (Pupil Information) Regulations 2005 (England). For children attending Practical Play as part of Alternative Provision, the commissioning school or local authority remains the data controller for the educational record, and requests should normally be directed to them. Practical Play will cooperate fully by sharing relevant data securely.

Actioning a subject access request

Requests for information must be made in writing, which includes email, and be addressed to Practical Play. If the initial request does not clearly identify the information required, then further enquiries will be made.

The identity of the requestor must be established before the disclosure of any information, and checks must also be carried out regarding proof of relationship to the child. Evidence of identity can be established by requesting production of:

passport driving licence

utility bills with the current address

Birth / Marriage certificate

P45/P60

Credit Card or Mortgage statement

This list is not exhaustive.

Any individual has the right of access to information held about them. However, with children, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. The Forest School leader or Director should discuss the request with the child and take their views into account when deciding. A child with competency to understand can refuse to consent to the request for their records. Where the child is not deemed to be competent, an individual with parental responsibility or a guardian shall make the decision on behalf of the child.

The response time for subject access requests, once officially received, is one calendar month (extendable by up to two months for complex requests, with notice). The period will not commence until after receipt of any required clarification of information sought. The Data Protection Act 2018 allows exemptions as to the provision of some information; therefore, all information will be reviewed prior to disclosure.

Third-party information is information provided by another party, such as the Police, Local Authority, Healthcare professional, or another school.

Before disclosing third-party information, consent must normally be obtained. There is still a need to adhere to the 40-day statutory timescale (extendable by up to two months for complex requests, with notice)

Any information which may cause serious harm to the physical or mental health or emotional condition of the child, or another should not be disclosed, nor should information that would reveal that the child is at risk of abuse, or information relating to court proceedings.

If there are concerns over the disclosure of information, then additional advice should be sought.

Where redaction (information blacked out/removed) has taken place, then a full copy of the information provided should be retained so that if a complaint is made, it can be established what was redacted and why.

The information disclosed should be clear; thus, any codes or technical terms will need to be clarified and explained. If information contained within the disclosure is difficult to read or illegible, it should be retyped.

Information can be provided at Practical Play with a member of staff on hand to help and explain matters if requested or provided at a face-to-face handover.

The views of the applicant should be considered when considering the method of delivery. If postal systems have to be used, then registered/recorded mail must be used.

Contact

If you have any questions or concerns about these policies/procedures, please contact Emma Reeve of Practical Play Forest School.

Further advice and information can be obtained from the Information.

Commissioner's Office(ICO) www.ico.gov.uk or telephone.