

# 1 Data Protection

As an outdoor education company we gather and store a fair amount of data on individuals and organisations in the execution of our business. This page is an attempt to lay out what data we store, why we need it, where we store it, who we share it with and when we delete it.

The Lupine Adventure Co-operative data protection officer is: Andy Godfrey

Individuals and organisations can contact the data protection officer to request a copy of the data that we hold on them and to request corrections are made as well as deletion and cessation of processing of that data. Complaints can also be made to the data protection officer or the Information Commissioners' Office (ICO)

It should be assumed that all PAYE employees of the co-operative have access to all data.

All data that is stored on Microsoft Sharepoint is backed up onto two Network Attached Storage devices and is accessible by, and in some cases synced to, logged in company laptops.

## 1.1 Individual Clients, enquirers and subscribers to our newsletters

What data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
<b>Email address and name (and details of when newsletters are opened) of subscribers to our newsletters</b>	To be able to send newsletters to subscribers	On the web server	No one	We routinely un-subscribe users whose addresses are bouncing and users may unsubscribe themselves. Un-subscribed user data is deleted every winter.	
<b>Consent form Information (includes medical information)</b> This varies between under 18's and over 18's but can consist of name, address, date of birth, medication,	To ensure we and any instructors working directly with you have contact information and medical	Physical consent forms are scanned in (originals shredded) and stored on Sharepoint.  Sometimes consent forms / medical info is collected via	Instructors  Medical professionals to assist them in the execution of their duties.	Instructors are obliged to delete information at the end of the event at the latest.  We reserve the right to keep the information indefinitely. However, in practice each year we delete	

<p>medical issues, parents contact details, doctors contact details, dietary preferences, Other family and friends contact details. Sometimes rather than using our consent forms we simply take copies of a School's consent forms, these may hold additional information.</p> <p>If we are working under the instruction of a school (i.e. they are responsible for health and safety and we are merely providing one or more staff then we may receive medical information on the day but do not store it at all.</p>	<p>information that we / they may require.</p> <p>To ensure that we are able to consent to emergency medical treatment in the case of under 18's if their parents cannot be contacted.</p> <p>To enable medical staff to release under 18's to our care after treatment.</p>	<p>Google Forms or Microsoft Forms. This information is therefore stored within the company Google drive or Microsoft Sharepoint drive and the data is also saved to an excel spreadsheet which is stored on the Sharepoint drive.</p>	<p>School staff to aid with our collation.</p>	<p>consent forms that we feel we no longer need using the following policy.</p> <p>Adult only courses - consents over 5 years old are deleted.</p> <p>Courses that involved young people as participants - We make an educated guess at the age of the youngest person (scout groups 10, Gold DofE 16, silver Dofe 14 etc. then count the years up to 18 and then add 5. We then delete forms when this period has passed.</p> <p>The reasons that we may keep the information longer than outlined above are twofold.</p> <p>1) The time scales outlined above are estimates and we don't want to delete data when we may still need it. The time required to check each consent form each year is prohibitive so we make educated guesses as to whether we need to keep batches of consent forms, this will result in some consent forms being kept slightly longer than strictly necessary.</p>	
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<p><b>Photos.</b> Photo consent is requested on consent forms.</p>	<p>We take pictures for social media release and for use in our promotions.</p>	<p>Microsoft Sharepoint</p>	<p>Posted on Social Media, used on our website and other promotions.</p>	<p>Not deleted routinely.</p>	
<p><b>Accident Reports</b> Personal information and details of incidents and near misses on accident reports.</p>	<p>Records need to be kept of first aid incidents and how they were responded to.</p>	<p>Microsoft Sharepoint</p>	<p>Accident reports involving the DofE are shared with the AAP unit of the DofE.</p> <p>The health and safety executive view our accident records but do not take copies.</p> <p>Our insurance company request information regarding accidents.</p>	<p>These are deleted on the same cycle as the consent forms.</p>	
<p><b>Emails</b></p>	<p>To organise events, we contact most clients by email.</p>	<p>Microsoft servers, our phones and our laptops.</p>	<p>Employees of the company and freelancers are</p>	<p>Not deleted routinely.</p>	<p>Email is accessed using</p>

Email addresses and personal information contained in emails.			sometimes forwarded relevant information via email.		Microsoft outlook, access is not permitted using other protocols
<b>DofE Green Forms</b> Name, e-dofe number, Date of Birth, location of campsites visited on expedition.	The DofE need to record who has attended courses.	Microsoft Sharepoint	The DofE regional offices and DofE assessors.	Not deleted routinely.	As of 2021 Green forms have been all but discontinued. This remains here for historical reasons
<b>DofE assessor reports</b> Name, e-dofe number, details of their expedition.	If assessor reports are not saved correctly on e-DofE then participants come back to us for copies.	Microsoft Sharepoint	Contents of forms is uploaded onto E-dofe.	Not deleted routinely.	

## 1.2 Schools and other organisations

What Data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
<b>Schools Database</b>  School Name and address, DofE contact, Phone number,	We contact schools to let them know about our services.	Microsoft Sharepoint  Hubspot account	No one.	Not routinely deleted.	

email, location of school, date last contacted, brief notes on what contact has been had previously.					
<b>Email list</b> Email address, recipient name. The software also records who has read the emails sent	We have a DofE professionals email list that we email up to 5 times a year.	It is a component of our website.	No one.	Not routinely deleted.	The website has an SSL certificate. People can un-subscribe to individual lists or the whole site. We have a double opt in system but also add people who request to be added via the consent forms.
<b>Emails</b> Email addresses and personal information contained in emails.	To organise events we contact most clients by email.	Emails are stored on Microsoft email servers and our laptops.	Employees of the company and freelancers are sometimes forwarded relevant information via email.	Not deleted routinely.	Email is accessed using Microsoft outlook, access is not permitted using other protocols

### 1.3 Employees

What Data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
<b>Photos</b>	We take pictures for social media release and for use in our promotions.	Microsoft Sharepoint	Posted on Social Media, used on our website and other promotions.	Not deleted routinely.	
<b>Bank details</b>	To pay wages and expenses.	In the Co-op bank online banking and Quickbooks	The Co-op bank and quickbooks.	Not deleted routinely.	

<p><b>Emails</b></p> <p>Email addresses and personal information contained in emails.</p>	<p>To communicate with staff.</p>	<p>Emails are stored on Microsoft email servers our phones and our laptops.</p>	<p>Employees of the company and freelancers are sometimes sent information by group email thus sharing the information and each others email addresses so that all can respond.</p>	<p>Not deleted routinely.</p>	<p>Email is accessed using Microsoft outlook, access is not permitted using other protocols</p>
<p><b>Details of criminal records</b></p>	<p>Safeguarding and vetting.</p>	<p>Microsoft Sharepoint</p>	<p>No one.</p>	<p>Deleted when no longer working for the co-operative.</p>	<p>DBS's are not stored but in the event of offenses showing up the information is copied into a file and notes attached detailing if we feel that any of the offences have any bearing on the suitability of the person to work with young people.</p> <p>DBS's that are temporarily stored on our servers while we are processing them may be backed up and theoretically retrievable until that back up file is deleted by the rotation policy. This is unintentional and un-avoidable. All backups are password protected</p>
<p><b>Qualifications overview and personal details</b></p> <p>Name, Telephone, email, qualifications held, first aid expiry, DBS Number status</p>	<p>To ensure that we have up-to-date records of qualifications and contact information at a glance.</p>	<p>Microsoft Sharepoint</p> <p>We also use a cloud based</p>	<p>Other members of Lupine staff and school staff as required to carry out duties.</p>	<p>Not routinely deleted.</p>	<p>The excel file is also password protected for a little extra security.</p>

(with a tick box if offences are recorded on it) vehicle insurance expiry, home town, driving license details		database system called Ragic.			
<b>Annual reviews</b>	To identify training needs and check on our performance.	Microsoft Sharepoint	No one.	Not routinely deleted.	
<b>PAYE info</b> National insurance number, tax code, pay amounts, tax and NI paid, Home address, Date of birth	To calculate pay.	Microsoft Sharepoint	HMRC.	Not routinely deleted.	Information is kept within HMRC basic PAYE tools.
<b>Copies of qualifications</b>	To prove that staff have the relevant qualifications.	Microsoft Sharepoint	Clients (on request).	Not routinely deleted.	We only pass on qualifications and do not pass on DBS information or ID such as drivers licenses.
<b>Copies of ID</b> Passport, driving license	To prove that we have ascertained the Identity of staff.	Microsoft Sharepoint	No One.	Not routinely deleted.	If staff have been asked to bring ID to a job but forget then we can pass this on with the consent of the member of staff.
<b>Green Form Data</b> Name and Telephone number	The DofE want contact details of supervisors and assessors on Jobs.	Microsoft Sharepoint	The DofE. Schools will also receive a copy.	Not routinely deleted.	As of 2021 Green forms have been all but discontinued. This remains here for historical reasons

## 1.4 Freelance outdoor professionals

What Data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
<b>Photos</b>	We take pictures for social media release and for use in our promotions.	Microsoft Sharepoint	Posted on Social Media, used on our website and other promotions.	Not deleted routinely.	
<b>Bank details</b>	To pay invoices.	In the Co-op bank online banking.	The Co-op bank.	Not deleted routinely.	
<b>Emails</b> Email addresses and personal information contained in emails.	To communicate with staff.	Emails are stored on Microsoft email servers and our laptops.	Employees of the company and freelancers are sometimes sent information by group email thus sharing the information and each others email addresses so that all can respond.	Not deleted routinely.	Email is accessed using Microsoft outlook, access is not permitted using other protocols
<b>Details of criminal records.</b>	Safeguarding and vetting.	Microsoft Sharepoint	No one.	Deleted when no longer freelancing for the co-operative.	DBS's are not stored but in the event of offenses showing up the information is copied into a file and notes attached detailing if we feel that any of the offences have any bearing on the suitability of the person to work with young people.  DBS's that are temporarily stored on our servers while we are processing them may

					be backed up and theoretically retrievable until that back up file is deleted by the rotation policy. This is un-intentional and unavoidable. All backups are password protected
<b>Qualifications overview and personal details</b> Name, Telephone, email, qualifications held, first aid expiry, DBS number (with a tick box if offences are recorded on it) vehicle insurance expiry, home town, driving license details	To ensure that we have up-to-date records of qualifications and contact information at a glance.	Microsoft Sharepoint  We also use a cloud based database system called Ragic.	Names, Phone numbers, email addresses and vehicle insurance status are shared with other staff on jobs (Lupine staff and Freelancers).  DBS numbers are sometimes shared with school staff  Other personal information is routinely shared.	If a Freelancer retires or is retired without ever working for us this information is deleted on retirement.  If a Freelancer has worked for us on their retirement we archive this data to be deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.	The excel file is also password protected for a little extra security.
<b>Reviews of work</b> Brief details of work done, strengths and weaknesses, if we feel that there should be deployment restrictions, etc.	To ensure we place suitable staff on jobs.	Microsoft Sharepoint	No one.	If a Freelancer retires or is retired without ever working for us this information is deleted on retirement.  If a Freelancer has worked for us on their retirement we archive this data to be	

				deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.	
<b>Invoices and amounts paid</b>	To ensure we pay the right amount and can show HMRC where our money has gone if requested.	Microsoft Sharepoint	HMRC, quickbooks and our accountant.	Not routinely deleted.  We delete invoices after 6 years	
<b>Copies of qualifications</b>	To prove that staff have the relevant qualifications.	Microsoft Sharepoint	Clients (on request).	If a Freelancer retires or is retired without ever working for us this information is deleted on retirement.  If a Freelancer has worked for us on their retirement we archive this data to be deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.	We only pass on qualifications and do not pass on DBS information or ID such as drivers licenses.
<b>Copies of ID</b> Passport, driving license	To prove that we have ascertained the identity of staff.	Microsoft Sharepoint	No one.	If a Freelancer retires or is retired without ever working for us this	If staff have been asked to bring ID to a job but forget then we can pass this on with

				<p>information is deleted on retirement.</p> <p>If a Freelancer has worked for us on their retirement we archive this data to be deleted at a time point commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.</p>	the consent of the member of staff
<p><b>Green Form Data</b> Name and Telephone number</p>	The DofE want contact details of supervisors and assessors on Jobs.	Microsoft Sharepoint	The DofE. Schools will receive a copy.	Not routinely deleted.	As of 2021 Green forms have been all but discontinued. This remains here for historical reasons