12 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.

12.1 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
Email address and name (and details of when newsletters are opened) of subscribers to our newsletters	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.	
Consent form Information (includes medical information) This varies between under 18's and over 18's but can consist of name, address, date of birth, medication, medical issues, parents contact details, doctors	To ensure we and any instructors working directly with you have contact information and medical information that we / they may require.	Physical Consent forms are scanned in (originals shredded) and stored on Sharepoint and backed up onto our internet connected network attached storage . Files stored on sharepoint are accessible from employees laptops and are	Consent form information is shared with the instructor via email. Consent form information may also be shared with	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 consent forms that we feel we no	

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. 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.	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. To enable medical staff to release under 18's to our care after treatment.	sometimes synced onto laptops. Sometimes consent forms / medical info is collected via Google Forms or Micoroft 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 and saved as above.	medical professionals to assist them in the execution of their duties. Consent form information is also shared with School staff to aid with our collation.	longer need using the following policy. Adult only courses - consents over 5 years old are deleted. 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. The reasons that we may keep the information longer than outlined above are twofold. 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.	

				2) If we were to have had a medical emergency we may elect to keep consent forms for longer.	
Photos. Photo consent is requested on consent forms.	We take pictures for social media release and for use in our promotions.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	Posted on Social Media, used on our website and other promotions.	Not deleted routinely.	
Accident Reports Personal information and details of incidents and near misses on accident reports.	Records need to be kept of first aid incidents and how they were responded to.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	Accident reports involving the DofE are shared with the AAP unit of the DofE. The health and safety executive view our accident records but do not take copies. Our insurance company request information regarding accident.	These are deleted on the same cycle as the consent forms.	

Emails Email addresses and personal information contained in emails.	To organise events, we contact most clients by email.	Emails are stored on Microsoft servers, our phones 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 (E.g. Imap and pop3)
DofE Green Forms Name, e-dofe number, Date of Birth, location of campsites visited on expedition.	The DofE need to record who has attended courses.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	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
DofE assessor reports 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.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	Contents of forms is uploaded onto E-dofe.	Not deleted routinely.	

12.2 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
Schools Database School Name and address, DofE contact, Phone number, email, location of school, date last contacted, brief notes on what contact has been had previously.	We contact schools to let them know about our services.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	No one.	Not routinely deleted.	
Email list 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.
Emails 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

12.3 Employees

What Data we store	Why we need it	Where we store it	Who we share it with	When is it deleted	Other information
Photos	We take pictures for social media release and for use in our promotions.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	Posted on Social Media, used on our website and other promotions.	Not deleted routinely.	
Bank details	To pay wages and expenses.	In the Co-op bank online banking.	The Co-op bank.	Not deleted routinely.	
Emails Email addresses and personal information contained in emails.	To communicate with staff.	Emails are stored on Microsoft email servers our phones 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 (eg IMAP and POP3)
Details of criminal records	Safeguarding and vetting.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on	No one.	Deleted when no longer working 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

| | | sharepoint are accessible from employees laptops and are sometimes synced onto laptops. | | | 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 un-avoidable. All backups are password protected |
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| **Qualifications overview and personal details**

Name, Telephone, email, qualifications held, first aid expiry, DBS status (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. | This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.

We also use a cloud based database system called Ragic. | No one. | Not routinely deleted. | The excel file is also password protected for a little extra security. |
| **Annual reviews** | To identify training needs and check on our performance. | This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on | No one. | Not routinely deleted. | |

		sharepoint are accessible from employees laptops and are sometimes synced onto laptops.			
PAYE info National insurance number, tax code, pay amounts, tax and NI paid, Home address, Date of birth	To calculate pay.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	HMRC.	Not routinely deleted.	Information is kept within HMRC basic PAYE tools.
Copies of qualifications	To prove that staff have the relevant qualifications.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops. .	Clients (on request).	Not routinely deleted.	We only pass on qualifications and do not pass on DBS information or ID such as drivers licenses.
Copies of ID Passport, driving license	To prove that we have ascertained the Identity of staff.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS)	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.

		drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.			
Green Form Data Name and Telephone number	The DofE want contact details of supervisors and assessors on Jobs.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	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

12.4 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
Photos	We take pictures for social media release and for use in our promotions.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	Posted on Social Media, used on our website and other promotions.	Not deleted routinely.	
Bank details	To pay invoices.	In the Co-op bank online banking.	The Co-op bank.	Not deleted routinely.	
Emails 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

Details of criminal records.	Safeguarding and vetting.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	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 un-avoidable. All backups are password protected
Qualifications overview and personal details Name, Telephone, email, qualifications held, first aid expiry, DBS status (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.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops	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	The excel file is also password protected for a little extra security.

		and are sometimes synced onto laptops. We also use a cloud based database system called Ragic.		consent forms for events they were engaged on, to our best estimate.	
Reviews of work Brief details of work done, strengths and weaknesses, if we feel that there should be deployment restrictions.	To ensure we place suitable staff on jobs.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	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.	
Invoices and amounts paid	To ensure we pay the right amount and can show HMRC where our money has gone if requested.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on	HMRC and our accountant.	Not routinely deleted.	

		sharepoint are accessible from employees laptops and are sometimes synced onto laptops.			
Copies of qualifications	To prove that staff have the relevant qualifications.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	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. |
| **Copies of ID**
Passport, driving license | To prove that we have ascertained the identity of staff. | This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are | 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 | 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 |

		accessible from employees laptops and are sometimes synced onto laptops.		commensurate with the deletion of the final consent forms for events they were engaged on, to our best estimate.	
Green Form Data Name and Telephone number	The DofE want contact details of supervisors and assessors on Jobs.	This data is stored on our Microsoft Sharepoint space and is backed up onto our internet connected Network Attached Storage (NAS) drive. Files stored on sharepoint are accessible from employees laptops and are sometimes synced onto laptops.	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