



# Data Protection Policy & Procedures

## 1. Policy

### 1.1 Definitions

Personal data means any information about an individual from which that individual can be identified. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.

Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

### 1.2 Responsibility

Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.

All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.

### 1.3 Overall policy statement

Taunton Home Education needs to keep personal data about its members in order to carry out group activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation.

We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

We will only collect, store and use data:

- for purposes that are in our group's legitimate interests, or
- for purposes for which the individual has given explicit consent, or

- for contracts with the individual whose data it is, or
- to comply with legal obligations, or
- to protect someone's life (for example sharing information about a relevant health condition with paramedics if somebody is unable to communicate for themselves, in order to help save their life).

We will provide individuals with details of the data we have about them when requested by the relevant individual.

We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.

We will endeavour to keep personal data up-to-date and accurate.

We will store personal data securely.

We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.

We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so. *See para 2.7 of our Procedures concerning handling of personal data for bookings with external activity providers.*

We will advise members of their right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of their personal data. [www.ico.org.uk](http://www.ico.org.uk). ICO helpline: 0303 123 1113.

We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

## 2. Procedures

## **2.1 Introduction**

In order to help us uphold our Data Protection policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

## **2.2 General procedures**

Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third party website (e.g. Google Drive) we will ensure the third party comply with the GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.

When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.

We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

## **2.3 Privacy Notice for new members on sign up**

**See Appendix A**

## **2.4 Membership list and contacting members.**

We maintain a membership list. This includes the names and contact details of members. When people sign up we will explain how their details will be used, how they will be stored, and that they may leave the group and have their details removed from the membership list at any time. We will use the list to share information about forthcoming group events, classes and activities and other home education opportunities and information with our members and to consult them about the running of the group. When sending emails to members we will use the blind copy function to ensure members' email addresses are not visible.

## **2.5 Supporting individuals**

If a member or other home educator seeks advice relating to home education or related matters over the phone any personal details they reveal must be kept completely confidential (unless someone's life is at risk in which case other procedures kick in). We will not make notes or store any data arising from such conversations unless the person involved is asking for us to provide specific support or advocacy and consents to us making notes to assist them.

From time to time, members ask us to help them resolve an issue they are having with the council relating to their home education or request a supportive statement or letter to provide to a professional or for a benefit/grant claim.

We will request explicit, signed consent before sharing any personal details with the council or any other relevant third party.

We will not keep information relating to an individual's personal situation for any longer than is necessary for the purpose of providing them with the support they have requested.

Personal data relating to matters for which we have provided support or advocacy will be stored securely by a member of the committee, and not shared among the rest of the committee or with other volunteers unless necessary for the purpose of providing the support requested.

Details relating to individual's circumstances will be treated as strictly confidential.

## **2.6 Contacting committee members**

The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.

Committee contact details (mobile phone and email) will be shared among the committee.

Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than Taunton Home Education business, without explicit consent.

## **2.7 Volunteers**

Members who are not on the Committee may be involved in helping run or administer an activity from time to time. To allow them to work together with other such volunteers or members of the Committee it may sometimes be necessary to share their contact details with such other persons. We will only do this with explicit consent. *Note: at the moment we rarely have volunteers who are not also members but in the event of that occurring this policy and these procedures will also apply in the same way to them.*

## **2.7 Bookings with external activity providers**

We may sometimes need to share specific data with a third party activity provider to enable members to book their child(ren) onto an activity or programme such as Outdoor Adventure Days with Channel Adventure (they need name, Date of Birth, gender, medical needs of children and an emergency parent contact number) or the Duke of Edinburgh Awards Scheme (name of child, date of birth, email, address). We will ensure any such provider is compliant with GDPR and the Data Protection Act 2018. Members will always be advised what information will be passed on to a provider such as this when they sign up for a course/award programme and will need to explicitly consent to this.

## **2.8 Use of images, audio or video recording**

Our membership form asks for parents to state whether they allow or do not allow images or videos of their children to be used on our Facebook Page and website. If that part of the form is not filled in we assume there is no consent and will act as if they had stated they 'do not allow'. Similarly we will not share images or names of members in a public domain without their explicit consent.

## **2.9 Photos and film footage at events - general**

We sometimes take photos or videos at our events which we use afterwards to publicise our activities, and people often like to see photos of their community having fun together. However, we will ensure the people we are photographing know they are being photographed and understand how the images will be used. We will be careful to comply with parents' statements on membership forms concerning this. At events open to home educators from beyond our membership – e.g. Not Back to School picnic is attended by wide

range of home educators – we will use a display notice (the contents of which will also be placed on any such Facebook event listing eg on the Home Ed Community Hub) at Appendix B to ensure people's privacy and personal data is respected.

### **2.10 Operation of our Facebook Groups**

All our Facebook Groups are to be maintained as PRIVATE groups. Access to our Facebook Groups is restricted to members. Anything said/posted within those groups is confidential – members are to be advised not to share anything anyone has posted outside the group without that person's explicit consent. The Home Ed Community Hub for Taunton and Surrounding Areas Facebook Group is for anyone home educating or considering it, not just members but the same rules apply as it is a group we run.

### **2.11 Website**

We will check that our website is GDPR/DPA compliant and take necessary action to ensure it complies.

## **3. Review of Policy and Procedures**

The Committee will seek free legal advice to check these policy and procedures are fully compliant with the law. Should we be advised to make any revisions we will do so swiftly and bring them back to the whole membership to agree. In any case, thereafter, these procedures will be reviewed at least every two years.

## **Appendices**

### **Appendix A: Privacy Notice for new Members**

### **Appendix B: Display notice about photos/filming at our events**

## Appendix A

### Privacy Notice for Members and Service Users

#### The type of personal information we collect

As a member or service user with Taunton Home Education we may ask you to provide certain personal information (data) about yourself in order that we can provide our services to you. We currently collect and process the following information:

- Full name, names of children, a contact telephone number and email. (We do not collect addresses routinely on sign up only when you have requested documents to be posted to you.)
- Whether or not you have agreed for photos/videos to be taken of your child/ren and added to the website /facebook page.
- Any critical information which you wish us to have – e.g food allergies – or essential information which is needed in order for you and your child to participate in an activity safely.
- Records of any payments or donations you make to Taunton Home Education.
- Record of any accidents you or your child have while at a Taunton Home Education meet up, class or event.

If you sign up for the Duke of Edinburgh Award scheme for your child you will additionally need to provide full name of child, address, date of birth and – if you require adjustments details of any medical needs, impairments/disability. (This information is shared only with the Licensing Organisation).

For a Channel Adventure Outdoor Activity Day or similar with another trusted provider you will need to provide full name of child, emergency contact info, gender of child, details of any medical needs. (This information is shared only with the Activity Provider).

If you need our advocacy to help resolve a problem you are having with an external organisation – e.g. Education Safeguarding who deal with Elective Home Education at Somerset County Council – you may need to provide us with additional personal information so that we can assess how best to support you. You will need to give us explicit permission to use this information solely for the purpose of providing advocacy and it will be treated as strictly confidential.



Volunteers/Management Committee:

- Full name, address, telephone number (including mobile) and email.
- Whether you have a current DBS check.
- Record of any accidents you have had while undertaking voluntary work for us.

Please note our Facebook Groups are all set to private. Please do not share any information from any of the groups outside the groups without seeking permission from Admins.

Also note when we send an email to all members/service users or a segment there of we use blind copy so no one else has your email address.

### **How we get your personal information and why we collect it**

The personal information we process is provided to us directly by you in order that we can provide our services to you.

We use the information that you have given us in order to keep in touch with members: notify you of and enable you to access and take part in meet ups/classes/activities/events, consult you on group business and activities and update you on our work.

### **Processing your personal information**

The law requires us to tell you the basis on which we process your data.

Where we are providing services to you at your request or communicating with members, the law permits us to process your data if it is in our and your legitimate interest (i.e. used in a way you would expect the data to be used) but only so long as we need to.

### **Protecting your personal information**

Your information is securely stored on a password protected electronic file with one hard copy kept in a locked drawer at Weir Lodge, 83 Staplegrove Road, Taunton TA1 1DN. Only specific authorised members of the Management Committee have access to the data we hold on you.

If you ask for another member's contact details we will ask that member first whether they are happy for us to pass them on or suggest they contact you direct.

Committee members email and phone numbers may need to be shared within the Committee only so members of the Committee can contact each other.

We will never share your data with third parties for marketing purposes.

We do not share your data with anyone else or any other organisation unless it is necessary for the purpose for which you have given us the data or we are legally required to (e.g. in an emergency we may share your data with emergency services, NHS, social services).

### **Retaining your personal information**

We keep your data only for as long as it is needed to complete the task for which it was collected. If you tell us you no longer need our services or cease to be a volunteer or a member, your data will be erased as soon as possible.

### **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances e.g. when you no longer need our services or when you cease to be a member.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [tauntonhomeeducation@gmail.com](mailto:tauntonhomeeducation@gmail.com) or on 07473 119425 or at the address given above if you wish to make a request.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [tauntonhomeeducation@gmail.com](mailto:tauntonhomeeducation@gmail.com). You can also complain to the ICO if you are unhappy with how we have used your data. ICO Helpline number: 0303 123 1113. ICO website: <https://ico.org.uk>.

## Appendix B

# Photographs and/or film footage will be taken at today's event.

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Taunton Home Education will be taking photos and/or film footage at today's event. These images will be used by the group in the following ways:

- The group's printed publicity
- The group's online publicity (including Facebook and Twitter)
- Shared with group members for personal use only

- Shared with the following third party organisations for use in their printed and online publicity (including Facebook and Twitter):  
\_\_\_\_\_ (note this will hardly ever apply - maybe relevant for Duke of Edinburgh and Channel Adventure activity days)

They will be stored securely and will not be kept for longer than they are needed for the purposes listed above.

If you would prefer for you or your child not to be photographed, please speak to

Name: Caroline Ellis (insert appropriate bods' names)

Mobile phone number: 07473 119425

If you would like to see your images, or would like us to delete them, please contact the group on 07473 119425 or by email:  
tauntonhomeeducation@gmail.com

