

AFRICA WILD TRAILS

CHALLENGE · EXPLORE · DEVELOP

Africa Wild Trails Limited **Privacy Notice - How we use personal information**

At Africa Wild Trails (AWT) we collect both Personal and Sensitive information. We are committed to the protection of all data for which we hold responsibility. AWT acts as a Data Controller and complies with the Principles of the Data Protection Act 2018.
<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

The handling of Personal and Special data is in accordance with Data Protection Principles and as per GDPR (General Data Protection Regulation) Article 5 all personal data shall be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate, and where necessary, kept up to date.
5. Retained only for as long as necessary.
6. Appropriate measures shall be taken against unauthorised or unlawful processing of personal data, and against accidental loss or destruction, or damage to, personal data.
7. Personal Data shall be processed in accordance with the rights of data subjects under the Data Protection Act 2018.
8. Personal data will only be transferred to a country or territory outside of the European Economic Area after signed agreement with that person. The receiving in country personnel ensures an adequate level of protection for the rights and freedoms of data in relation to the processing of personal data.

As part of our compliance with GDPR Africa Wild Trails Limited managing Director is the appointed Data Protection Officer. The DPO is Mr Angus Wingfield who can be contacted on angus@afriawildtrails.com.

Client data we collect at AWT includes but is not limited to:

- Personal Information such as name, age, height, weight, date of birth
- Personal address/family address
- Full medical questionnaire data
- Next of Kin
- Unique Pupil Numbers
- Unique Learner numbers address
- Telephone information
- Dietary information
- Photographs
- Youth support services agreement
- In care/welfare details
- SEN data
- Exclusions, behavioural and achievement data
- Interventions, post 16 learning information



For definitions of Personal and Sensitive Data please see the ICO definition:
<https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

Why we collect and use this information

We use the venture member data:

- to assess the suitability of each potential venture member
- to provide appropriate pastoral care during the venture
- to assist staff support venture member learning experience
- to assist staff monitor and report on venture member progress
- to comply with the law regarding data sharing

The lawful basis on which we use this information

We collect and process pupil information as per Article 6 of the GDPR which covers lawful processing . We collect and process sensitive information as per Article 9 of the GDPR.

Collecting venture member information

The intention to share data relating to individuals to an organisation outside of our venture members organisation shall be clearly defined within notifications and details of the basis for sharing given. Data will be shared with external parties in circumstances where it is an assessed and agreed requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

Storing venture members data

- We hold pupil data in the form of paper records, in our specific client record database and these records are held for no longer than necessary.
- AWT recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.
- All data held in any form of media (paper, tape, electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services.
- All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Who we share venture members information with

We routinely share venture member information with:

- Schools that the venture member attend during and after leaving the venture
- Key personnel involved in the venture risk management process
- Key Adventure Leaders in the UK and abroad during the venture
- Medical provision providers in the UK and abroad during the venture



Why we share venture member information

We do not share information about our venture members with anyone without consent unless the law and our policies allow us to do so.

We are required to share information about our venture members when there is a medical reason to do so.

We share information with alternative provision providers such as SEN data, venture members name, risk factors, medical information so that the providers have a clear idea of venture members needs and that the providers can contact next of kin/parents/carers if needed.

PARENTS: Data collection requirements for schools

To find out more about the data collection requirements placed on schools by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

A parent or guardian can request that only their child's name, address and date of birth is passed to their local authority or provider of youth support services by the school. This right is transferred to the child/pupil once he/she reaches the age 16. AWT will nevertheless still require certain information to complete our venture member information sheets. If AWT cannot gain all the information required, we reserve the right not to accept that particular person onto a venture.

PARENTS: The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies. Schools are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-userguide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties such as Africa Wild Trails who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of school data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required



- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:
<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, contact the AWT DPO: Mr Angus Wingfield on angus@afriawildtrails.com

Please note that we will answer requests for personal data within 30 days of receipt of the request form.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing 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; and claim compensation for damages caused by a breach of the Data Protection regulations

AWT will not reveal the following information in response to Subject Access Requests:

- Information that might cause serious harm to the physical or mental health of the individual.
- Information that would reveal that a child is at risk of abuse or where disclosure of that information would not be in the child's best interest.

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 Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer:

Angus Wingfield
Director, Africa Wild Trails
angus@afriawildtrails.com

