



Data Protection

Policy

Huathe believes that individuals have autonomy over their personal information and that we as a company should respect that right. We believe that people interested in our company and the kinds of activities, courses and events we run should choose to be given that information and be informed about the information we hold about them.

It is necessary for huathe to hold some sensitive information about our participants in order that we can respond quickly and effectively in an emergency. It is the responsibility of huathe to keep that information safe and secure and to reassure our participants that it is safe and secure.

Privacy Procedures

To honour the above policy, the following procedures are in place:

Our appointed Data Controller is Carol Middleton.
Our appointed Data Processor is Elizabeth Swift.
We hold certified membership of ICO.

By 'Personal Data' we mean all information relating to a living individual who can be identified by that data. This might be identification from that data alone or in conjunction with other bits of data we hold.

We keep personal data in order that we can:

- i. Ensure our participants match the training profile for the course
- ii. Communicate with students during training
- iii. Send information about CPD, camps and other events
- iv. Keep people safe during training, events and workshops
- v. Manage and maintain our financial records

We keep a log of:

- i. Where our data comes from
- ii. How long we intend to store it
- iii. How we obtained the information and

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- iv. The different places it is stored.

Anyone can request the data we hold about them or ask for it to be deleted by contacting Carol (Data Controller) or Elizabeth (Data Processor).

We keep personal data safe by

- i. Storing and destroying it securely
- ii. Not collecting or retaining excessive amounts of data and by
- iii. Protecting personal data from loss, misuse, unauthorised access or theft.
- iv. Special category data is deleted after the final training weekend; after the programme or project, or after the course (whichever is soonest)
- v. Carrying out an annual data audit
- vi. Emptying computers' recycling bins regularly.

We do not share data with a third party without explicit permission from the named individual. When we do share data, it is to

- i. Manage administration, invoice and billing with hosting organisations
- ii. Manage certification of qualifications
- iii. Support the wider Forest School community

The following procedures protect personal data at huathe:

- i. All phones and computers have anti-virus and anti-malware software installed and kept up to date.
- ii. An appropriate Benefit Risk Assessment is in place.
- iii. Emails transmitting personal data files are password protected in Word are coded with a password. The password is sent to the recipient by text or phone.
- iv. Private, password protected portals are used to exchange data.
- v. Care is taken with portable devices to avoid accidental loss. For additional protection, all portable drives are encrypted.
- vi. Paper copies of personal data is safely stored in a locked building.
- vii. Personal data that is no longer needed by huathe is destroyed or deleted.
- viii. Data is printed out or written out only when necessary.
- ix. Personal data is not sent in subject or body of emails.
- x. Group emails to participants who don't know each other are sent BCC.
- xi. Cookies are only used to facilitate ease of use on the website and not collected or analysed by huathe.
- xii. Information on invoices is kept to a minimum.

We respect the following rights of all individuals:

- i. The right to erasure (to be forgotten). All data held on someone wanting to be erasure will be permanently deleted.
- ii. The right to object: everyone has the right to challenge why and how we are processing information. We will stop processing an individual's data until they are satisfied that there are safe and legitimate grounds for our holding and using their information.

- iii. The right to portability: anyone can ask for the data we hold on them to be transmitted to them.
- iv. The right to rectification: any errors in data are rectified within one month of notification.

In the event of a data security breach:

- i. The ICO (www.ico.org.uk) will be informed within 72 hours.
- ii. If there is a high risk the data subject (individual) will be informed.
- iii. Steps will be taken to secure and recovered data.

This policy was adopted at an IV meeting on 7 June 2018 and reviewed in January 2020.

Signed.....*E.Swift*.....*C.Middleton*.....