

STATEMENT

- a. British Exploring Society is committed to safeguarding the privacy of all stakeholders. This statement explains how we collect, use and disclose information. It applies to all information gathering, including online. British Exploring collects and uses information about people with whom it communicates.
- b. This personal and sensitive personal information must be dealt with properly and securely however it is collected, recorded and used. There are safeguards to ensure this in the General Data Protection Regulation which is enforced by the Information Commissioner's office.
- c. British Exploring regards the lawful and correct treatment of personal information as a priority. It is essential to the successful and efficient performance of its functions, and to maintain confidence between the Society and those with whom it deals. To this end British Exploring aims to adhere fully to the Principles of Data Protection, as set out in the General Data Protection Regulation.

British Exploring Society as a body is a DATA CONTROLLER under the General Data Protection Regulations, and its Council of trustees is ultimately responsible for the policy's implementation.

Definitions

Data Owner – is the person or entity which can authorise or deny access to certain data, and is responsible for its accuracy and integrity

Data Subject – the individual who is the subject of personal and sensitive information.

NB; the data protection act does not count as a data subject an individual who has died or who cannot be distinguished from others. Can we group Data Owner and Data Subject as per the below definition?

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Data Controller – 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

Data Processor – ‘Processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

PRINCIPLES

The General Data Protection Regulation regulates the data processing relating to living and identifiable individuals. This includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems. The principles apply to “personal and sensitive personal data” from which the subjects of that data are identifiable. British Exploring Society’s employees, volunteers and trustees who process, use or have access to any personal information in the course of their duties will ensure that these principles are followed at all times.

Data users must comply with the data protection principles of good practice which underpin the Act. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

British Exploring follows the Data Protection Principles outlined in Article 5 of the General Data Protection Regulation, which are summarised below:

- Personal data will be processed fairly, lawfully and in a transparent manner
- Data will only be collected and used for specified, explicit and legitimate purposes
- Data will be adequate, relevant and not excessive
- Data will be accurate and up to date
- Data will not be held any longer than necessary
- Data subject’s rights will be respected
- Data will be kept safe from unauthorised access, accidental loss or damage
- Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- Data will not routinely be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data*

* It may sometimes be necessary to transfer personal information overseas. Any transfers made will be in compliance with the data protection act. In some cases British Exploring Society will need to provide personal data to local agents outside the European Economic area in order to apply for named permits or in order to provide emergency support. British Exploring Society will make all possible endeavours to contract with local agents appropriately to protect the personal data of all its stakeholders.

What is meant by ‘Personal information and sensitive personal information’

Personal information means information that identifies someone as an individual, such as:

- personal details
- family details
- lifestyle and social circumstances
- financial details
- education and employment

- visual images

Sensitive personal information means information about:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs of a similar nature
- offences and alleged offences
- criminal proceedings, outcomes and sentences

British Exploring Society's commitment to data owners/subjects

- a. We will seek your consent to hold your personal and sensitive data.
- b. We will only hold your personal data for as long as is necessary for clearly specified purposes (section 10).
- c. Where we ask for personal and sensitive data, we will be clear with you why we need it, and who will have access to it.
- d. We will only share personal and sensitive information with relevant persons to enable them to undertake specific duties at British Exploring Society.
- e. We will additionally seek your consent to hold your personal data for the purposes of Membership.
- f. We will additionally seek your consent to hold any personal or sensitive data for the benefit of the British Exploring Society Archive.
- g. We will not share your personal data with third parties for their marketing purposes.
- h. We will take appropriate measures to ensure that your personal information is protected from unauthorised access or modification, unlawful destruction and improper use.
- i. If you wish to see records of any correspondence, personal and or sensitive data you have sent to us, or if you have a query or complaint about our data/privacy policy, we provide a subject access request form for you to get in touch with us.
- j. British Exploring Society will make every effort to secure consent from staff, explorers, volunteers and trustees before displaying images in which they appear. Our contractual arrangements with explorers include global, in-perpetuity permission to publish all images, on any platform, in connection with their training and expeditions with British Exploring. We will however remove any image from the public domain, if it is within our power to do, so if a complaint is received where for whatever reason it has not been possible to secure consent in advance.

How do we collect personal and sensitive personal information?

Personal information and/or sensitive personal information may be collected in a variety of ways:

- Volunteer applications
- Explorer applications
- Leader applications
- Competition entries
- Expedition content – for example journals/diaries/projects
- Additional recruitment information such as interviews and assessment notes
- Fundraising events registrations
- Donation pledges
- Fundraising forms
- Newsletter registrations
- Requests for information
- Volunteer feedback forms
- Job applications
- New staff forms
- Membership applications and renewals
- Council applications

British Exploring Society may also collect personal information and/or sensitive personal information when you download resources from our website, complete a survey or if you contact us by email.

In addition, we use software to identify which areas of our site are visited most frequently. This helps us to understand how our website is being used so that we can make it more useful for visitors.

What is personal and sensitive personal information collected used for?

Information we collect may be used to:

- process applications, establish identity
- process payments
- keep a record of essential contact details
- Enact any operational procedures including evacuations support evaluation
- Engage staff
- Pay staff
- Maintain personnel records
- Engage volunteers and make any appropriate arrangements for them
- Process donation pledges
- Promote British Exploring Society
- Respond to requests for information
- Provide newsletters or details of events: contact stakeholders with current and future information about our work, events, campaigns and activities, or any other features of British Exploring Society

- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, enhancing, improving or modifying our services, identifying usage trends, determining the effectiveness of campaigns and operating and expanding our charitable activities
- As we believe to be necessary or appropriate: (1) under applicable law, including laws outside any specific country of residence; (2) to comply with legal process; (3) to respond to requests from public and government authorities including public and government authorities outside any specific country of residence; (4) to enforce our terms and conditions; (5) to protect our operations; (f) to protect our rights, privacy, safety or property and/or that of our stakeholders; and (6) to allow us to pursue available remedies or limit the damages that we may sustain.
- To contribute to our Archive

Who is information shared with?

We sometimes need to share the personal and sensitive information we process with the individual themselves, the data subject, and with other organisations. Where this is necessary we are required to comply with all aspects of the General Data Protection Regulation. This means that any Data to be shared will be:

- a. Processed fairly, lawfully and in a transparent manner
- b. Processed for limited, defined purposes and in an appropriate way
- c. Adequate, relevant and not excessive for the purpose
- d. Accurate and up to date
- e. Not kept longer than necessary for the purpose
- f. Processed in line with data subject's rights
- g. Secure
- h. Not transferred to people or organisations without adequate protection

The following is a list of the types of organisations with whom we may need to share some of the personal or sensitive information we process for one or more reasons. Where strictly necessary we share information with:

- Family, associates or representatives of the person whose personal data we are processing (i.e. designated next of kin or emergency contact details)
- Employees
- Volunteers
- Partners
- Trustees
- Third party service providers including emergency services
- Current, past and prospective employers
- Healthcare, social and welfare organisations
- Statutory bodies including HMRC
- Providers of goods and services
- Educator and examining bodies
- Financial organisations
- Employment and recruitment agencies

- Survey and research organisations
- Business associates and professional advisers
- Police forces
- Other voluntary and charitable organisations

PROCEDURES

The following procedures have been developed to ensure that British Exploring Society meets its Data Protection responsibilities. Data collected, stored and used by British Exploring Society falls into two broad categories:

- a. British Exploring Society's internal data records; Staff, volunteers and trustees
- b. British Exploring Society's external data records; Members, customers, clients.

INTERNAL DATA RECORDS

- a. Purposes

British Exploring obtains personal data (names, addresses, phone numbers, Next of Kin details, email addresses) application forms, references and in some cases other documents from staff, volunteers and trustees. This data is stored and processed for the following purposes:

- Recruitment
- Equal Opportunities monitoring
- Volunteering opportunities
- To distribute relevant organisational material e.g. meeting papers
- Payroll
- Access
- To meet statutory obligations (Charity Commission, Companies House, etc)
- To meet Health and Safety requirements

The contact details of staff, volunteers and trustees will only be made available as appropriate to other staff and trustees. All information supplied on application will be kept in soft copy and used only for the purpose for which it was supplied. Contact details of staff, volunteers and trustees will not be passed on to anyone outside the organisation without their explicit consent.

All staff and volunteer emergency contact details will be kept in our CRM for Health and Safety purposes to be used in emergency situations e.g. fire/ bomb evacuations.

- b. Disclosures and Barring Services

British Exploring secures enhanced DBS checks for all trustees and for almost all staff and volunteers. We will act in accordance with the DBS's code of practice. Hard copies of disclosures, when they are supplied, are kept for no longer than is required. In most cases this is no longer than six months in accordance with the DBS Code of Practice. There may be circumstances where it is deemed appropriate to exceed this limit e.g. in the case of disputes. In the majority of cases, hard copies are supplied, and soft data is held by GB Group, the umbrella body which processes British Exploring DBS checks. British exploring undertakes to ensure that no reproductions of any DBS certificate or its content are made, including scans

or photocopies, without the explicit consent of DBS. We will only share DBS certificate information with relevant persons in the course of their specific duties relevant to recruitment and vetting processes.

c. Accuracy and Access

Staff, volunteers and trustees will be supplied with a copy of their personal data held by British Exploring if a written request is made to the CEO. All post which is clearly marked confidential for a member of staff, trustee or volunteer will be reserved/forwarded to be opened by the addressee only. British Exploring operates a password-protected computer system. Where personal and sensitive data relates to staff members, files are accessible only to the CEO and Executive Assistant.

EXTERNAL DATA RECORDS

a. Purposes

British Exploring obtains personal data (such as names, addresses, and phone numbers) from members/clients and from their Next of Kin. We also collect sensitive data such as medical information from our clients. This data is obtained, stored and processed to assist staff and volunteers in the efficient running of services and to ensure high standards of care and positive experiences for our explorers, leaders and all programme participants. This personal and sensitive data is stored and processed only for the purposes outlined in the agreement and service specification signed by clients or as otherwise authorised (for example by acknowledging terms and conditions online) by the client/member.

b. Consent

When a formal application to participate in an expedition is made through our online application service, the terms and conditions of that application include details of how data will be used. Applicants are required to acknowledge our terms and conditions and our Data and privacy protection policy on submission of their application. Personal and sensitive data may also be updated/collected over the phone and using other methods such as e-mail. This will only occur *after* clients/volunteers have already consented to the collection of personal and sensitive data and will remain within the same scope of collection, processing and use as already consented to.

c. Our client groups

British Exploring activities extend from 14 – 24 year olds. We are particularly mindful of the need to be sensitive to the needs of young and/or vulnerable data owners/subjects. Applicants under the age of 18 are required to secure adult consent for their participation in a British Exploring Expedition. British Exploring emphasises clear language and transparency in its written and verbal communication with clients under the age of 18 to ensure that they understand what we mean by sensitive and personal data. (We explain to young clients what we intend to do with any data we collect, and their rights as a data subject/owner before they consent to give us any information Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner or unless there is a legal duty of disclosure under other legislation.

d. Access

Only specific British Exploring staff and volunteers will normally be given access to personal and sensitive data. All staff, volunteers and trustees are made aware of our Data Protection Policy and of their obligation to handle personal data with absolute discretion. Information supplied is kept in secure filing, paper and electronic systems and is only accessed by those individuals involved in the delivery of the service. Information will not be passed on to anyone outside the organisation without their explicit consent. Some forms of such consent are included in our contractual arrangements with our clients in case of emergencies. Individuals will be supplied with a copy of any of their personal and sensitive data held by British Exploring Society within 30days if a subject access request form is submitted.

e. Accuracy

British Exploring Society will take regular steps to keep personal data up to date and accurate by contacting data subjects/owners. Personal and sensitive data will be stored/destroyed/de-identified according to the schedule and the guidelines in Annex A. If an error in our personal and sensitive data is identified by an individual and we receive a request from them to amend their records during our retention period, we will do so if we can verify the identity of the individual and can confirm the accuracy of the amend.

f. Sharing of data/Chain of Custody

The Work of British Exploring Society requires us from time to time to share specific pieces of personal and sensitive information with key staff members, volunteers and partner organisations. Some of these organisations are based outside the European Economic Area and wherever possible this information remains digital, is password protected, and is retained within the British Exploring Society CRM and our cloud service provider. Whilst on expedition, we may need to provide paper documentation to a limited number of individuals and/or organisations for whom digital access cannot be assured. In this case we will implement a Chain of Custody to assure the location, status and subsequent safe destruction of any personal and sensitive data remote from British Exploring Society premises. In some circumstances, outside the European Economic Area, British Exploring Society may be required for the performance of a contract to provide data in order to access a service (for example a National Park) without a guarantee of a chain of custody or Data Privacy Policy. In these circumstances British Exploring Society can accept no liability for the safety of personal or sensitive data.

g. Storage

Personal data may be kept in paper-based systems and/or on a password-protected computer system as well as our cloud service provider Google Drive and our Customer Relationship Manager, Microsoft Dynamics. Paper-based data are stored in organised systems. Appropriate technical and organisational measures are taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. British Exploring Society operates a clear desk and clear screen policy at all times.

RETENTION OF DATA/DATA DESTRUCTION SCHEDULE

No documents will be stored for longer than is necessary. For guidelines see Annex A.

All documents containing personal and sensitive data will be disposed of securely in accordance with Data Protection principles.

- a. Paper-based data will be shredded. Any external shredding services handling personal and sensitive data will provide a Chain of Custody, be verified as secure and will be required to provide a Certificate of Destruction.
- b. Wherever possible information will be stored in an electronic format, as long as an original copy is capable of being produced from the electronic copy. (the term 'original' meaning a copy which is equivalent in every relevant legal respect in its characteristics to the original document no matter how many times removed it is from an original paper document.) This implies a high standard of legibility for electronic images such that no ambiguity of interpretation is introduced that does not derive from the original.
- c. Digital data will be deleted from our system according to the schedule in annex A. British Exploring Society operates a cloud-based office system. Our first obligation is to put data 'beyond use'. We then commit to permanent deletion of the material as soon as possible. Deleted file items are retained for a month post-deletion, accessible only by our Administrator, and are then permanently deleted. No deleted records are retained on individual PCs.
- d. We will de-identify or 'redact' any information sources kept for use beyond our retention schedule for the purposes of analysis/planning/to provide trend data. Such information use is likely to include incidents, demographic data, medical information, campaign information.
- e. The only other sources of personal and sensitive data to be retained beyond the schedule below are those where British Exploring Society is in receipt of individual consent for addition to the British Exploring Archive, which is a permanent record.

Destruction schedule: British Exploring Society will destroy data on an annual cycle, within the calendar year of a due destruction date for any particular item.

