



Holiday Club Data Privacy Policy

1. ABOUT THIS POLICY

1.1 GENERAL DESCRIPTION

This policy explains when and why we collect personal information about parents/carers and children in relation to the Holiday Club, how we use it and how we keep it secure and your rights in relation to it.

We collect, use and store personal data, as described in this Data Privacy Policy, when you register your child(ren) to attend the Holiday Club and as the Holiday Club progresses.

We reserve the right to amend this Data Privacy Policy without prior notice. You are advised to regularly check our website (www.elim-aldershot.org.uk) for any amendments.

We will always comply with the Data Protection Act (DPA) when dealing with your personal data. Further details on the DPA can be found at the website for the Information Commissioner (www.ico.gov.uk).

1.2 TERMS AND MEANINGS

The following terms used in this Policy have the meanings shown:

Term	Meaning or Definition
Data Controller	The data controller is the legal entity that determines purposes and the manner in which personal data are processed. For the purposes of the Holiday Club, the "controller" of all personal data we hold about you and the children you register is the Holiday Club Leader.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
Personal Data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, from the data.
Holiday Club	Holiday Club means the club we run for up to one week on an annual basis, generally at the beginning of the Hampshire Schools summer holidays. This does not include other activities for children and young people that may be run by us.
We / Us	We are Elim Pentecostal Church, Aldershot, and we are part of Elim Foursquare Gospel Alliance, registered charity 251549 (England & Wales) and SC037754 (Scotland).
You	Any parent or carer registering a child or children for the Holiday Club.

2. YOUR PERSONAL DATA

2.1 WHAT INFORMATION DO WE COLLECT AND WHY

Type of Information	Purpose	Legal Basis for Processing
Parent/Carer's Address and Contact Details	To pass information about the Holiday Club To pass information about or seek guidance/permission regarding a child.	Our legitimate interest in communicating relevant or important information Vital interest of a child where contact is required in case of emergency Consent where you indicated you wish to be contacted about future years' Holiday Clubs
Child's Details including the health questionnaire and other information about the child's needs	To ensure we are able to provide the child with appropriate care and an environment meeting their needs	Vital interest of the child where allergies or medical needs are concerned. Our legitimate interest in enabling us to provide the child with appropriate care.
Attendance Records	To monitor the number of children in the premises at any time.	Our legitimate interest in managing the Holiday Club for the safety of all present.
Accident Book Entries	Any record of an incident or accident meeting the recording or reporting requirements of RIDDOR ¹ or OFSTED	Necessary for compliance with a legal obligation
Photographs	To show parents/carers the activities their children have enjoyed during the week	Our legitimate interest in showing parents the activities their children have enjoyed during the Holiday Club,

2.2 HOW WE PROTECT YOUR PERSONAL DATA

We will not transfer your personal data outside the EU. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

2.3 WHO ELSE HAS ACCESS TO THE INFORMATION YOU PROVIDE?

We will never sell your personal data nor will we share your personal data with any third parties except where we are required to do so by law.

2.4 HOW LONG DO WE KEEP YOUR INFORMATION?

With the two exceptions detailed below, we will hold your personal data on our systems for a maximum of six months after the end of the Holiday Club or for as long afterwards as it is in our legitimate interest to do so or for as long as is necessary to comply with our legal obligations. When our legal basis for processing your data ceases, your data will be erased from our systems and any hard-copy versions securely destroyed. This may mean that we are unable to respond to questions about information you provided once it has been erased.

Your personal data will be retained if you indicated at the time of entering your details that you would like to be contacted about Holiday Clubs in the future. Your personal data will only be used to let you know about Holiday Clubs. Your consent may be withdrawn at any time:

- go to the Contact Us form (www.elim-aldershot.org.uk/contact)
- select the Data Protection option in the Subject
- state in the message that you wish to withdraw consent for further Holiday Club communication
- your email address must be supplied for this to become effective.

If a child suffers an incident or accident meeting the recording or reporting requirements of RIDDOR¹ or OFSTED, an accident book entry will be made and this will be retained for the statutory 3-year period. Your personal data and the child's details and health questionnaire may form part of this record and may also be retained.

Photography in the church building will be restricted to an authorised photographer using a camera, not a smart phone or device. Photographs will be displayed inside the church building for the duration of the Holiday Club for the interest of parents and carers, and will be securely disposed of within six months of the end of the Holiday Club. Photographs in which individual children cannot be identified or have been rendered unidentifiable may be used by us to publicise future events.

3. YOUR RIGHTS

3.1 YOUR RIGHTS UNDER DPA

You have rights under the DPA:

1. to access your personal data
2. to be provided with information about how your personal data is processed
3. to have your personal data corrected
4. to have your personal data erased in certain circumstances
5. to object to or restrict how your personal data is processed
6. to have your personal data transferred to yourself or to another business in certain circumstances

¹ Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

3.2 WHO TO CONTACT

For matters relating to Data Protection, please contact:

The Data Administrator,
Elim Pentecostal Church,
52-56, Holly Road,
Aldershot,
Hants GU12 4RJ.

On our website, use the Contact Us form (www.elim-aldershot.org.uk/contact) and select the Data Protection option in the Subject.

3.3 INFORMATION COMMISSIONER'S OFFICE

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Information Commissioner's Office
Wycliffe House
Water Lane
WILMSLOW
Cheshire SK9 5AF
Tel: 0303 123 1113.
<https://ico.org.uk/concerns/>

