

Path Hill Outdoors

Data Protection Policy

Status:	Updated Policy Date:	Scheduled Review:
Statutory	September 2025	September 2027

This Data Protection Policy ensures that Path Hill Outdoors complies with the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It sets out how we collect, use, store, and protect personal data, and the rights of individuals whose data we process.

Policy Objectives

The objective of this policy is to ensure that Path Hill Outdoors acts lawfully, fairly, and transparently when handling personal data. Responsibility for ensuring that Path Hill Outdoors has an appropriate and effective data protection policy lies with the Director, who is the organisation's Data Protection Officer (DPO).

Legal Framework

This policy is based on the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance issued by the Information Commissioner's Office (ICO). These laws ensure that individuals have rights regarding their personal data and impose obligations on organisations that process such data.

Principles of Data Protection

Path Hill Outdoors adheres to the following principles as set out in Article 5 of the UK GDPR. Personal data must be:

- Processed lawfully, fairly, and in a transparent manner.
- Collected for specified, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
- Processed securely, with appropriate technical and organisational measures to protect against unauthorised or unlawful processing, loss, destruction, or damage.

Lawful Bases for Processing

Path Hill Outdoors relies on the following lawful bases for processing personal data:

- Consent – where the individual has given clear consent for processing their personal data for a specific purpose.

- Legitimate interests – where processing is necessary for the legitimate interests of Path Hill Outdoors, provided those interests are not overridden by the rights and freedoms of the data subject.

Data Subject Rights

Under the UK GDPR, individuals have the following rights regarding their personal data:

- The right to be informed about how their data is used.
- The right of access to their personal data.
- The right to rectification of inaccurate or incomplete data.
- The right to erasure ('right to be forgotten').
- The right to restrict processing.
- The right to data portability.
- The right to object to processing.
- Rights in relation to automated decision-making and profiling.

Requests to exercise these rights should be submitted to the Director (Data Protection Officer). Path Hill Outdoors will respond within one month of receiving the request.

Data Collection, Storage, and Retention

Personal data is collected only for specific, legitimate purposes and is stored securely, either electronically with password protection or in locked physical storage. Data is retained only for as long as necessary for the purpose for which it was collected, in accordance with ICO and sector-specific guidance.

Path Hill Outdoors follows these general retention periods:

- Student records – retained for five years after the child leaves Path Hill Outdoors, unless subject to legal hold.
- Staff employment records – retained in line with ICO guidance to meet legal, payroll, and pension obligations.
- Unsuccessful job applicant records – retained for six months.
- Formal complaint records – retained for at least seven years.

Data is securely deleted or destroyed using appropriate methods such as secure erasure or shredding. Disposal is documented to ensure accountability.

Data Sharing and Third Parties

Path Hill Outdoors does not share personal data outside the United Kingdom. Where data is shared with third parties (for example, educational institutions or safeguarding platforms such as CPOMS), it is done so under a written Data Processing Agreement in compliance with Article 28 of the UK GDPR.

CPOMS Data Processing

CPOMS software is used to record incidents involving students, including behaviour, safeguarding, first aid, and SEND information. Information may be shared with schools or agencies where necessary for safeguarding or transition. Path Hill Outdoors maintains a Data Processing Agreement with CPOMS to ensure compliance with UK GDPR requirements.

Access to Personal Data

Individuals have the right to access their personal data. Requests must be made in writing and will be processed within one month. Path Hill Outdoors will verify the requester's identity before releasing any information.

If a request includes third-party data, consent will be sought from the third party before disclosure. If consent is not granted, Path Hill Outdoors will consider whether the information can still be released lawfully.

Data Breaches

Path Hill Outdoors takes all data breaches seriously. Any suspected or actual data breach must be reported immediately to the Director (DPO). The DPO will investigate the breach and, where required, report it to the Information Commissioner's Office (ICO) within 72 hours in accordance with Article 33 of the UK GDPR. If the breach poses a high risk to individuals, those affected will be notified without undue delay.

Accountability

Path Hill Outdoors maintains records of processing activities, conducts Data Protection Impact Assessments (DPIAs) for high-risk processing, and ensures that staff receive regular training on data protection responsibilities.

Review and Approval

This policy is reviewed annually or when significant changes occur in legislation or operations. The Director is responsible for approving and implementing this policy.

Reviewed by

A handwritten signature in black ink, appearing to read "Julia Warwick", is written over a faint, light-colored signature line.

Julia Warwick- Director September 2025