

Hants and Dorset Christian Youth Camps

Policy Document

Including

Safeguarding policy

Behaviour policy

Anti-bullying policy

Data Protection Policy



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Part 1 - Safeguarding Policy

SECTION 1 Details of the organisation

Name of Organisation: **Hants and Dorset Christian Youth Camps**
Address: **14 Egerton Gardens, London W13 8HQ**
Tel No: **07768 760079**
Email address: **mikebrook@hdcyc.org.uk**
Charity Number: **Charitable Incorporated Organisation - 1166865**
Regulators details: **Charity Commission**
Insurance Company: **Combined Insurance with A&T Insurance Group**

The following is a brief description of our organisation and the type of activities we undertake with children and adults who have care and support needs:

The purpose of the organisation is to advance the Christian faith, in particular among children and young people in the United Kingdom; this is to be achieved by

- promoting and running either alone or with other similar Christian organisations residential holidays at which the Christian faith is presented and Biblical teaching given, and
- providing assistance and facilities for other Christian organisations to run similar residential holidays and activities.

Our commitment

As a Board of Trustees we recognise the need to provide a safe and caring environment for children, young people and adults. We acknowledge that children, young people and adults can be the victims of physical, sexual and emotional abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.” As a Board of Trustees we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and attached practice guidelines are based on the ten **Safe and Secure** safeguarding standards published by *Thirtyone:eight* (formerly CCPAS)

The Board of Trustees undertakes to:

- endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
- provide on-going safeguarding training for all its workers and will regularly review the operational guidelines attached.
- ensure that the campsite meets the requirements of the Equality Act 2010 and all other relevant legislation as far as is practicable, and that it is welcoming and inclusive.
- support the Designated Safeguarding Persons in their work and in any action they may need to take in order to protect children and adults with care and support needs.

The Board of Trustees agrees not to allow this document to be copied by other organisations.

SECTION 2 **Recognising and responding appropriately to an allegation or suspicion of abuse**

Understanding abuse and neglect

Defining child abuse or abuse against an adult is a difficult and complex issue. A person may abuse by inflicting harm, or failing to prevent harm. Children and adults in need of protection may be abused within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with the child or adult.

In order to safeguard those in our organisation we adhere to the UN Convention on the Rights of the Child and have as our starting point as a definition of abuse, Article 19 (see [appendix 2](#))

Detailed definitions, and signs and indicators of abuse, as well as how to respond to a disclosure of abuse, are included here in our policy.

Definitions of abuse (see [appendix 3](#))

How to respond to a child wishing to disclose (see [appendix 5](#))

Safeguarding awareness

The Board of Trustees is committed to safeguarding training, developing a culture of awareness of safeguarding issues to help protect everyone. All our workers will receive induction training and undertake safeguarding training on a regular basis.

Responding to allegations of abuse

Under no circumstances should a worker carry out their own investigation into an allegation or suspicion of abuse. Following procedures as below:

- The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to Jayne Lock (hereafter the "Designated Safeguarding Lead") tel no: **07766 257260** or **01747 850765** who is nominated by the Board of Trustees to act on their behalf in dealing with the allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.
- In the absence of the Designated Safeguarding Lead or, if the suspicions in any way involve the Designated Safeguarding Lead, then the report should be made to Dave Cook (hereafter the "Deputy Safeguarding Lead") tel no: **07961 433 615** or **01202 433 103**. If the suspicions implicate both the Designated Safeguarding Lead and the Deputy, then the report should be made in the first instance to *Thirtyone:eight* (formerly CCPAS) PO Box 133, Swanley, Kent, BR8 7UQ. Telephone **0845 120 4550** (Emergency Number **0303 003 111** – option 2). Alternatively contact Social Services or the police.
- Where the concern is about a child the Designated Safeguarding Lead should contact Children's Social Services. Where the concern is regarding an adult in need of protection contact Adult Social Services or take advice from *Thirtyone:eight* as above.

The local **Children's** Social Services office telephone number (office hours) is **01929 553456**. The out of hours emergency number is **01202 657279**.

The local **Adult** Social Services office telephone number (office hours) is **01305 221016**. The out of hours emergency number is **01305 858250**.

The Police Protection Team telephone number is **01305 222222** or **999**.

- The Designated Safeguarding Lead **may** need to inform others, including the Senior Leader on site where appropriate, depending on the circumstances and/or nature of the concern:
- Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.
- Whilst allegations or suspicions of abuse will normally be reported to the Designated Safeguarding Lead, the absence of the Designated Safeguarding Lead or Deputy should not delay referral to MASH (Multi-Agency Safeguarding Hub) **01202 735046**, Social Services or the Police after taking advice from *Thirtyone:eight*. A written record should be made of this contact including the date, time, contact person and advice given, and kept in a secure place.
- The Board of Trustees will support the Designated Safeguarding Lead/Deputy in their role, and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.
- It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from *Thirtyone:eight*, although the Board of Trustees hope that members of Hants & Dorset Christian Youth Camps will use this procedure. If, however, the individual with the concern feels that the Designated Safeguarding Lead/Deputy has not responded appropriately, or where they have a disagreement with the Designated Safeguarding Lead(s) as to the appropriateness of a referral they are free to contact an outside agency direct. We hope by making this statement that the Board of Trustees demonstrate its commitment to effective safeguarding and the protection of all those who are vulnerable.

The role of the Designated Safeguarding Lead/ deputy is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate.

Detailed procedures where there is a concern about a child:

Allegations of physical injury, neglect or emotional abuse.

If a child has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the Designated Safeguarding Lead/Deputy will:

- Seek and follow advice given by MASH (single-point of contact) for advice Tel No. **01202 735046** and/or *Thirtyone:eight* (who will confirm their advice in writing) if unsure whether or not to refer a case to Children's Social Services.
- Contact Children's Social Services (or *Thirtyone:eight*) for advice in cases of deliberate injury, if concerned about a child's safety or if a child is afraid to return home.
- Not tell the parents or carers unless advised to do so, having contacted Children's Social Services.
- Seek medical help if needed urgently, informing the doctor of any suspicions.
- For lesser concerns, (e.g. poor parenting), encourage parent/carer to seek help, but not if this places the child at risk of significant harm.
- Where the parent/carer is unwilling to seek help, offer to accompany them where reasonably practicable. In cases of real concern, if they still fail to act, contact Children's Social Services direct for advice.

Allegations of sexual abuse

In the event of allegations or suspicions of sexual abuse, the Designated Safeguarding Lead/Deputy will:

- Seek and follow the advice given by *Thirtyone:eight* if, for any reason they are unsure whether or not to contact Children's Social Services/Police. *Thirtyone:eight* will confirm its advice in writing for future reference.
- Contact the Children's Social Services Department Duty Social Worker for children and families or Police Child Protection Team direct. They will NOT speak to the parent/carer or anyone else.

Detailed procedures where there is a concern that an adult is in need of protection:

Suspicious or allegations of abuse or harm

including; physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery, domestic abuse

If there is concern about any of the above, Designated Safeguarding Lead/Deputy will contact the Adult Social Care Team who have responsibility under the Care Act 2014 to investigate allegations of abuse. Alternatively, *Thirtyone:eight* can be contacted for advice.

Allegations of abuse against a person who works with children/young people

If an accusation is made against a worker (whether a volunteer or paid member of staff) whilst following the procedure outlined above, the Designated Safeguarding Lead, in accordance with Local Safeguarding Children Board (LSCB) procedures will need to liaise with Children's Social Services in regards to the removal of the worker, also making a referral to a LADO (Local Authority Designated Officer) Telephone: **01305 221122**.

SECTION 3 Prevention

Safer recruitment

The Board of Trustees will ensure all senior leaders will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form and a self-declaration form
- Written references have been obtained, and followed up where appropriate
- A disclosure and barring check has been completed where necessary (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information)
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.

Management of Workers – Codes of Conduct

As a Board of Trustees we are committed to supporting all workers and ensuring they receive support and supervision. All workers have been issued with a code of conduct towards children, young people and adults with care and support needs.

SECTION 4 Practice Guidelines

As an organisation working with children, and young people with care and support needs we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of false or unfounded accusation.

Our general code of conduct for workers and good practice guidelines are included (see [appendix 4](#))

Approved by the Trustees

Date: June 2019

This policy was reviewed in 2022

Contact information was updated in 2022

APPENDIX 1 Board of Trustees Safeguarding Statement

The Board of Trustees of Hants and Dorset Christian Youth Camps hereafter referred to as 'the Trustees' recognises the importance of its ministry /work with children and young people and its responsibility to protect everyone entrusted to our care.

We are committed to creating and enabling a healthy culture in order to minimise any coercion and control within our organisation.

The following statement was agreed by the Trustees on: 9th June 2018 and updated in 2022.

This organisation is committed to the safeguarding of children and young people and ensuring their well-being.

Specifically:

- We recognise that we all have a responsibility to help prevent the physical, sexual, emotional abuse and neglect of children and young people and to report any such abuse that we discover or suspect.
- We believe every child and young person should be valued, safe and happy. We want to make sure that children and young people we have contact with know this and are empowered to tell us if they are suffering harm.
- All children and young people have the right to be treated with respect, to be listened to and to be protected from all forms of abuse.
- We believe in the necessity of creating a healthy culture in our organisation where the value of all people is recognised and challenges are responded to appropriately.
- We promote fundamental British values. We have a due regard to prevent people from being drawn into terrorism.

We are committed to:

- Following the requirements for UK legislation in relation to safeguarding children and adults and good practice recommendations.
- Respecting the rights of children as described in the UN Convention on the Rights of the Child.
- Implementing the requirements of legislation in regard to people with disabilities.
- Ensuring that workers adhere to the agreed procedures of our safeguarding policy.
- Keeping up to date with national and local developments relating to safeguarding.
- Supporting the Designated Safeguarding Lead/s in their work and in any action they may need to take in order to protect children and young people
- Ensuring that everyone agrees to abide by these recommendations and the guidelines established by this organisation.
- Supporting parents and families
- Nurturing, protecting and safeguarding of children and young people
- Supporting, resourcing, training, monitoring and providing supervision to all those who undertake this work.
- Supporting all in the organisation affected by abuse.
- Adopting and following the 'Safe and Secure' safeguarding standards developed by *Thirtyone:eight* (formerly CCPAS) .

We recognise:

- Children's Social Services (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child. Adult Social Care (or equivalent) has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about an adult with care and support needs.
- Where an allegation suggests that a criminal offence may have been committed then the police should be contacted as a matter of urgency.
- Where working outside of the UK, concerns will be reported to the appropriate agencies in the country in which we operate, and their procedures followed, and in addition we will report concerns to our agency's headquarters.
- Safeguarding is everyone's responsibility.

We will review this statement and our policy and procedures annually.

If you have any concerns for a child or adult with care and support needs then speak to one of the following who have been approved as Designated Safeguarding Leads for this organisation.

Jayne Lock Designated Safeguarding Lead
safeguarding@hdcyc.org.uk

Dave Cook Deputy Designated Safeguarding Lead

A copy of the full policy and procedures is available from www.hdcyc.org.uk

Agreed by the Board of Trustees, and signed on their behalf by

Signed Mike Brook

Date 9th June 2018

Reviewed 2022

Contact information updated 2022

APPENDIX 2 United Nations statements

UN Universal Declaration of Human Rights and the International Covenant of Human Rights

Everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.”

UN Convention on the Rights of the Child definition of abuse, Article 19

1. Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in **the care of parent(s), legal guardian(s) or any other person who has the care of the child.**
2. Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

APPENDIX 3 Statutory Definitions of Abuse (Children)

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

Child protection legislation throughout the UK is based on the United Nations Convention on the Rights of the Child. Each nation within the UK has incorporated the convention within its legislation and guidance.

The four definitions of abuse below operate in England based on the government guidance 'Working Together to Safeguard Children (2018 updated Dec 2020)'.

What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual

abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

APPENDIX 4 Good practice guidelines

Please ensure that:

- As far as possible a leader is not alone with a child where their activity cannot be seen. At camp this means being alone in any tent, wash area, or First Aid Tent – ensure that another adult is with you.
- In a counselling situation with a young person, where privacy and confidentiality are important, try to move to a far corner of the Marquee or a quiet place where you are visible to all.
- In mixed groups there are male and female leaders.

You, the leader, should:

- Treat all children and young people with respect and dignity befitting their age, watching your language, tone of voice, and where you put your body.
- Not engage in any of the following:
 - Invading the privacy of children when they are toileting.
 - Rough or sexually provocative games.
 - Making sexually suggestive comments about or to a young person even in “fun”.
 - Inappropriate or intrusive touching of any form.
 - Any scapegoating, ridiculing, or rejecting a child or young person.
- Learn to control and discipline children without using physical punishment (see Behaviour Policy – Appendix 5)
- Make sure another adult is present if, for example, a young child has soiled their underclothes and needs to be thoroughly washed.
- Not let youngsters involve you in excessive attention-seeking which is overtly sexual or physical in nature.
- Not solicit affection.
- Not be in any situation where you are alone with a young person.
- Not give lifts to children or young people on their own.
- Not take photos on your mobile phones or upload onto social media any pictures of children or young people.
- Inform any of the Senior Leadership team of any pastoral or “counselling” situations you are engaged in with young people. Be aware that in certain circumstances we may need to have contact with parents.
- Not share sleeping accommodation with children or young people.

On trips out:

- Make sure there is sufficient supervision for the number and age of children.
- Ensure that minibuses are not overloaded (only one passenger per seat).
- Seat belts must be worn **AT ALL TIMES**.
- Make sure an adult accompanies the driver, sitting in the rear of the vehicle if possible.
- Make sure that you have a list of names of all passengers and you return with the correct children/young people.

Record keeping

In order to safeguard all leaders from any false allegations, please keep a written record of any incidents where a leader has to counsel or discipline, including details of what happened and who was present. All leaders who witnessed, heard or responded in any way should record details and sign and date the record.

Good Practice with Colleagues

If you see a leader acting in ways that might be misconstrued, be prepared to speak to them and/or your senior leadership team about your concerns. Leaders should encourage an atmosphere of mutual support and care that allows all workers to be comfortable enough to discuss inappropriate attitude or behaviour. All leaders should be aware of using appropriate language in their conversations.

APPENDIX 5 Behaviour Policy

Statement

Hants and Dorset Christian Youth Camps encourages and supports campers and leaders to have positive attitudes to themselves and others, valuing each other's efforts and interests and helping all to develop confidence and self-esteem.

Any behavioural difficulties that arise will be dealt with promptly and in a calm and consistent manner in accordance with the policy guidelines by leader(s) who have been made aware. For persistent and more serious behaviours, involving safety issues, safeguarding issues, verbal abuse or physical injury to other campers or leaders, the matter will be brought to the overall leader(s) attention. Where appropriate, we will work in partnership with parents/guardians and will discuss accordingly a plan of action.

Should every agreed effort to support the camper/leader be unsuccessful the Overall Leader(s) may ask the parents/guardians to remove the camper. The leader will be removed from camp.

Guidelines

1. **Reinforce desired behaviour** – Think positively. Acknowledge good behaviour to let them know they are appreciated. A smile, a gesture, or a brief word goes a long way.
2. **Use non-verbal cues** - Some undesirable behaviour cannot, and should not be ignored. Before responding verbally, however, it may be possible to make your disapproval clear in other ways. Eye contact, along with a firm look, may control the behaviour without potentially embarrassing the camper in front of peers. It often helps to position yourself near the camper who is acting out.
3. **Consider redirection or change of activity** – Sometimes problems result from boredom or dissatisfaction with the current activity. Tasks that are too difficult (or too easy) may lead an individual or a group toward disruptive behaviour.
4. **Clarify benefits of desired behaviour** – Desired behaviour yields benefits! Remember that pointing out benefits is most effective if you do so immediately after the good behaviour occurs. "Good team effort. You have worked really well together tidying up your tent."
5. **Clarify consequences of undesired behaviour** – All those on camp should clearly understand the alternatives available to them, and it is important to establish this from day one. As campers learn the rules, you can ask: "If you continue to act this way, what do you think will happen?" Avoid using a threatening tone of voice or belittling language which could lead to a negative response, and above all, clarify the consequences and follow through if the actions continue.
6. **Use time out or removal procedures** – Sometimes it is advisable to remove a disruptive camper so that little or no positive reinforcement can be received. The camper should be invited back after a short time, contingent on a change in behaviour. Remember this is only effective if the camper is moved to a less reinforcing space, i.e. not on display to peers.

7. **Loss of privileges** – Unlike the above strategies, a loss of privileges does not allow the camper to avoid consequences by displaying acceptable behaviour. Therefore, attention is directed to the loss of privileges itself, not the problem. This is in conflict with guideline number 1. Loss of privileges should be used as a last resort or in the case of an emergency involving personal safety.
8. **If in doubt, seek help!** – Whenever you are unsure of what action to take or are unable to deal with a situation, please seek help and advice from a more experienced leader or the overall leader(s). No one has all the answers to handling problems, and seeking help is never a sign of defeat or weakness.
9. **Remember that everyone is God's child.** – Each person on camp is a work of art crafted by God. Each camper and leader bears the image of God. Your job is to nurture that image, draw it out, and help that person become the person that God wants them to be. Don't forget to pray before meeting with the camper/leader.

APPENDIX 6 **Anti-bullying policy**

Statement

Hants and Dorset Christian Youth Camps encourages and supports campers and leaders to have positive attitudes to themselves and others, valuing each other's efforts and interests and helping all to develop confidence and self-esteem. Children have the right to protection from all forms of violence (physical or mental). They have the right to be kept safe from harm and must be given the proper care by those looking after them.

Any signs of or situations of bullying that arise will be dealt with promptly and in a calm and consistent manner in accordance with the policy guidelines by leader(s) who have been made aware. All cases of bullying to campers or leaders will be brought to the overall leader(s) attention. Where appropriate, we will work in partnership with parents/guardians and will discuss accordingly a plan of action.

Bullying will not be tolerated on camp. Parents/guardians of campers caught bullying may be asked to collect the camper immediately and leaders may be asked to leave the site.

What is bullying?

Bullying is the deliberate, unprovoked and unjustifiable use of force, either physical or mental, by an individual or group towards another individual or group. It can cause physical, psychological or emotional pain to the person(s) being bullied. It robs a person of their rights, their peace of mind and their self-esteem. It can happen one or more times. Bullying can be categorised into 4 main 'types':

- **Physical bullying** involves hitting, kicking and other types of physical harm including destruction of one's possessions
- **Verbal bullying** encompasses name-calling, teasing, intimidating and spreading hurtful rumours
- **Indirect bullying** is when one person, or group of people, undermines or tries to ruin a person's reputation by spreading rumours and gossiping behind their back.
- **Cyber-bullying** involves sending harassing, threatening and humiliating text messages, emails, posts, blogs, etc. as well as spreading hurtful rumours via the Internet

All types can be considered as seriously as each other.

Some aspects of bullying you might like to consider are:

Bullying can be

- Persistent
- Intimidating, stressful
- Pre-meditated
- Intentional
- Demoralising
- Humiliating, demeaning, threatening
- The use of a superior position of strength to intimidate
- A process designed to lower self esteem

Bullying can include the following acts

- Name calling
- Physical violence
- Demands for money or possessions
- Hiding someone's possessions
- Being pressured to do something you do not want to do
- Threatening behaviour
- Spreading nasty or false rumours
- Deliberately leaving people out or not talking to them
- Teasing and tormenting a person about their social class, race, religion, gender, disabilities, personal experience, possessions
- Being sent unpleasant notes or text messages or being made the subject of graffiti
- Being touched against your will
- Bullying of minority groups
- Mocking

Procedures for Bullying

1. Everyone on camp should be made aware that bullying is not tolerated in any form.
2. Anyone that is made aware of bullying taking place is expected to report this to a leader straight away and prompt action will be taken in accordance to Safeguarding policy by the leader that has been approached. A clear and precise account of the incident will be recorded and given to the Overall Leader(s).
3. A clear warning will be issued, and they will be told that should their negative behaviour continue they will be asked to leave camp.
4. They will be asked to apologise to the person bullied.
5. The person bullying will be removed from their tent and will be closely monitored by the Overall Leader(s).
6. The Overall Leader(s) will contact the parents/guardians informing them of the incident and may be asked to collect the camper immediately. Leaders may be asked to leave the site.

APPENDIX 7 Effective Listening

Whilst each camp will have spiritual leaders who will talk to the campers, it must be remembered that children will often decide themselves who they want to talk to. The child might test the adult out in some way before they are prepared to talk. Because of this, all adults, including the spiritual leaders, need to understand the importance of listening to children and responding appropriately.

It is important to identify ways to communicate effectively to all children/young people that they are valued, that what they say is important and that there are people who are happy to listen to them. If a child wants to talk:

- Ensure the physical environment is welcoming, giving opportunity for the child or young person to talk in private but making sure others are aware the conversation is taking place.
- It is especially important to allow time and space for the person to talk
- Above everything else listen without interrupting
- Be attentive and look at them whilst they are speaking
- Show acceptance of what they say (however unlikely the story may sound) by reflecting back words or short phrases they have used
- Try to remain calm, even if on the inside you are feeling something different
- Be honest and don't make promises you can't keep regarding confidentiality
- If they decide not to tell you after all, accept their decision but let them know that you are always ready to listen.
- Use language that is age appropriate and, for those with disabilities, ensure there is someone available who understands sign language, Braille etc.

Helpful responses

- You have done the right thing in telling
- I am glad you have told me
- I will try to help you

Don't say

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure this is true?
- Why? How? When? Who? Where?
- I am shocked, don't tell anyone else

APPENDIX 8 Digital & Social Media Use and Communications Policy

Introduction

Hants & Dorset Christian Youth Camps (H&DCYC) encourages reasonable and appropriate use of digital and social media where it is a relevant part of work and mission. However, we are also committed to the welfare of all leaders, volunteers and participants in our programmes as we believe that it is vital to provide a safe environment for everyone.

All guidelines must be referred to in conjunction with H&DCYC's safeguarding policies and procedures.

Adherence to these guidelines will help to avoid dangers such as radicalisation, Child Sexual Exploitation (CSE) and others. (See Appendix A for more information.)

Scope and Definitions

These guidelines relate to all volunteers that participate in H&DCYC programmes and activities working with adults and Children. For the purpose of this document:

- Child: relates to those aged under 18
- Volunteers: Relates to those who work in an unpaid capacity (including camp leaders, overall leaders, cooks, members of the admin team & trustees.)
- Digital and social media: relates to any type of interactive online media that allows parties to communicate with each other or share information

Summary Policy

H&DCYC ensures that:

1. Consent is provided by all adults (including carers, parents of children, or those with Power of Attorney (PoA) for adults who are unable to provide consent) prior to any video (including live streaming) and/or photographs taken at an event whereby individuals will be featured, recognisable or identified.
2. All H&DCYC policies and procedures are adhered to regarding the use of social media within its programmes and on its behalf. This includes but is not limited to Safeguarding and Data Protection.
3. Digital communication between volunteers and children or adults (including images, instant messaging and phone calls) where the content cannot be saved or shared, or where communication is anonymous, is not permitted, such as Instant Relay Chat (eg Snapchat).
4. All digital communication must be able to be recorded and kept as a log.
5. Where possible, digital communication with children should not be in a private one-to-one capacity, rather, all communication should include more than one volunteer.
6. All personnel acting on behalf of H&DCYC or in a personal capacity are aware that they should not damage the organisation's reputation.

7. Volunteers will only communicate with children that are legally permitted to use the various forms of digital communication. (Please refer to the Appendix B for guidelines of the most common sites.)
8. Digital communication between volunteers and children should be made available upon request to their parent/carer, trustees and other volunteers as appropriate, and subject to compliance with our safeguarding policy.
9. Care should be taken as to the nature, content and language so there is no ambiguity or misinterpretation, including the use of abbreviations (eg. lol).
10. If a phone call does need to be made to a child/young person, another volunteer should be present and notes kept of the conversation if practicable.
11. Communications with an individual child should, where possible, be short. The primary purpose should be to arrange, advertise or remind a child to attend an event. In addition, Digital Communication not related to the work and aims of H&DCYC is not permitted.
12. Specific guidelines for social media sites are set out in Appendix B and must be adhered to at all times.

H&DCYC procedures

must be adhered to in relation to the creation of social media groups, use of open communication pages and other such online communication tools

The creation of H&DCYC social media groups;

- The trustee responsible for Social Media must be informed and given admin rights to the group.
- The group must be 'closed' and must be monitored by at least two volunteers (including the trustee responsible for Social Media).
- Communication must occur openly through comments and posts on the page.
- Events can be posted on the page but photographs and video footage of events and children can only be posted on the page once permission is given.
- Privacy settings in photographs and video footage must be set to ensure that only members of the group see them.

The creation of H&DCYC open communication pages;

- The trustee responsible for Social Media must be informed and given admin rights to the page.
- Children must not be 'tagged' into locations/photographs or individually named. Subject to compliance with the Safeguarding Policy, this will not prevent the resharing (from an authorised H&DCYC account) of posts created by individuals, in which they have tagged.
- Personal details of children must not be shared (email, postal addresses or social media account names)
Only pre-agreed H&DCYC volunteers are permitted to post content to open pages, unless the page's administration approves the posts.

General Digital Media Concerns

Live Streaming

Live streaming allows users of various Social Networking sites to broadcast live video content using a camera-phone or computer through the Internet, and viewers to play the content via the web and other applications (eg. Facebook).

H&DCYC streaming policy

- As H&DCYC events are private, the overall leader/safeguarding lead must understand the live streaming of an activity makes it public.
- The individual camp's overall leader has the final decision about which events and activities are streamed.
- The volunteers, children and visitors must always be told which activities are being streamed and which parts of the site are visible on the streaming, either in print or verbally.
- The streaming of activities and events must always conform to H&DCYC safeguarding policy and particularly ensure that no child or vulnerable adult is filmed without their or their responsible adult's permission.
- Videos may be stored for the purposes of future editing with the aim of promotion, but these must be stored securely.

Social Media use at Camp

The use of Social Media by both volunteers and children while at camp must be agreed by the overall leaders, and in all cases must;

- Not contravene the camp's Behaviour Policy.
- Not contravene H&DCYC's Anti-Bullying Policy.
- Not contravene H&DCYC's Data Protection Policy.
- Not contravene H&DCYC's Safeguarding Policy.

APPENDIX 8A Definitions

Radicalisation via Social Media

The UK Government has identified extremism as 'one of the greatest threats we [the UK] face', specifically, Far-Right and Islamic extremism. Both Far-Right and Islamic extremist groups are increasingly using the Internet to radicalise and recruit children.

Figures published by the Office for National Statistics in 2016 estimate that 91% of 16-24 year old use social networking. Children today have easier access to the Internet through various devices making them vulnerable to harm from Islamic and Far-Right extremist groups.

Bullying

Please refer to our anti bullying policy.

Sexting

The NSPCC (and industry recognised) definition is *"when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages."*

They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.




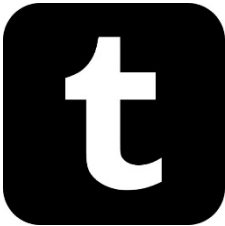
Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A child is breaking the law if they:





- take an explicit photo or video of themselves or a friend.
- share an explicit image or video of a child, even if it is shared between children of the same age.
- possess, download or store an explicit image or video of a child even if the child gave their permission for it to be created.

Child Sexual Exploitation and grooming

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children and young people may be tricked into believing they are in a loving, consensual relationship. They may be invited to parties and given drugs and alcohol and can be groomed and exploited online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs. Digital Media, particularly social media platforms such as Facebook can be used for *grooming* which is when someone builds an emotional connection with a child/young person to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed by a stranger or by someone they know (eg a family member, friend or professional) and can be male or female of any age.

APPENDIX 8A Networks

Network	Information
	<p>Facebook is a social network, which lets users create a page about themselves. Users can ‘add friends’, share pictures and videos, write on other people’s pages, send instant messages and join online groups.</p> <p>The minimum age for using Facebook is 13.</p> <p>As Facebook has a minimum age of 13, no communication with any child under 13 is to take place via Facebook.</p>
	<p>Instagram is a picture and video sharing app. Users can post content and use hashtags to share experiences, thoughts or memories with an online community. Users can ‘follow’ their friends, family, celebrities and companies.</p> <p>The minimum age for using Instagram is 13.</p> <p>As Instagram has a minimum age of 13, no communication with any child under 13 is to take place via Instagram.</p>
	<p>Twitter is a messaging service that lets users post public messages, pictures and videos called tweets. As well as tweets, users can send private messages. Brands and companies can also have Twitter accounts.</p> <p>The minimum age for using Twitter is 13.</p> <p>As Twitter has a minimum age of 13, no communication with any child under 13 is to take place via Twitter.</p>
	<p>Tumblr is a social networking site that lets users share text, photos, quotes, links, audio clips, slideshows and videos. Users can customise their page, share other people’s posts and send private messages.</p> <p>The minimum age for using Tumblr is 13.</p> <p>H&DCYC’s Policy</p> <p>Tumblr isn’t restricted in its content in the way Facebook, Instagram & Twitter is, and sexually explicit and other offensive material is easily accessed through it. H&DCYC does NOT permit leaders to create content relating to H&DCYC, and NO contact is to be made by H&DCYC leaders to young people through Tumblr.</p>

	<p>Snapchat allows the user to take a picture or record a video and add messages or drawings to then send it to a contact or multiple contacts. Once the picture or video has been viewed, it lasts for 1-10 seconds before being deleted from the recipient's phone and erased from Snapchat's servers.</p> <p>H&DCYC's Policy</p> <p>Adults could lead themselves open to allegations that inappropriate pictures were sent to children via this method and predatory adults could use this to sexually harass under 18s. When communicating with children there must be accountability or a record of what was said/sent, as Snapchat does not provide this facility H&DCYC does NOT permit the use of snapchat by leaders within an H&DCYC program or for H&DCYC purposes.</p>
	<p>YouTube is a place to watch, create and share videos. Users can create their own YouTube account, make a music playlist and even create their own channel which means that users will have a public profile. It allows users to comment on videos and create video playlists.</p> <p>For younger children there is a separate <i>YouTube for Kids</i> site with child friendly videos as the minimum age for using Youtube is 13.</p> <p>H&DCYC's Policy</p> <p>As YouTube has a minimum age of 13, no communication with any child under 13 is to take place via YouTube.</p> <p>Caution must be taken for showing or recommending videos on Youtube due to the ease of access to age-inappropriate material.</p>
	<p>WhatsApp is an instant messaging app, which lets users send messages, images and videos. This can be one-to-one or in a group conversation.</p> <p>The minimum age for setting up a WhatsApp account is 13.</p> <p>H&DCYC's Policy</p> <p>As WhatsApp has a minimum age of 13, no communication with any young person under 13 is to take place via WhatsApp.</p> <p>WhatsApp should not be used for private one-to-one conversations with a child.</p>
	<p>ooVoo is a video chat app. It lets users make video calls, voice calls and send texts to friends and family. Users can also start a group video chat with up to 12 people. The default privacy settings are set to 'public', so users can talk to people they don't know, but this can be changed so that users can just talk to their friends.</p> <p>The minimum age for using ooVoo is 13.</p> <p>H&DCYC's Policy</p> <p>As ooVoo has a minimum age of 13, no communication with any young person under 13 is to take place via ooVoo.</p>

Part 2 - Data Protection Policy

1. Introduction

- 1.1. Hants and Dorset Christian Youth Camps (H&DCYC, we or us) handles Personal Data about people attending camp as campers and leaders. We also handle a limited amount of Personal Data about those who provide prayer and financial support and receive our newsletters.
- 1.2. This policy sets out the steps that H&DCYC has taken to ensure that, when Processing Personal Data, we remain compliant with the General Data Protection Regulation 2016/679 and the Data Protection Act 2018 (DPA). . It applies to everyone who Processes Personal Data on behalf of H&DCYC, including the Trustees, Bookings Administrator, Leaders' Bookings Administrator, Overall Leaders, Cooks and, to a limited extent, other Leaders at the camps run by H&DCYC.
- 1.3. Where you see a capitalised word or words in this Policy (like "Personal Data") that means that word or phrase has a specific meaning. Please refer to the Glossary at the end of the policy for the definitions that apply in this Policy.
- 1.4. Specific guidance will be given to people in certain roles (such as the Overall Leaders for each camp run by H&DCYC) as to the steps they need to take to ensure compliance with this Policy and relevant legislation.

2. Scope

- 2.1. We recognise that the correct and lawful treatment of Personal Data will maintain confidence in H&DCYC. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously at all times.
- 2.2. The Data Protection Lead is responsible for overseeing this Data Protection Policy and, as applicable, developing specific guidance to sit alongside it. That post is currently held by Madeleine Hardyman, a Trustee of H&DCYC.
- 2.3. Please contact the Data Protection Lead with any questions about the operation of this Data Protection Policy or the UK GDPR or if you have any concerns that this Data Protection Policy is not being or has not been followed. In particular, individuals Processing Personal Data on behalf of H&DCYC must always contact the Data Protection Lead if they:
 - (a) are processing Personal Data which is not covered by our Privacy Notices (which are available on the website, or from the Data Protection Lead);
 - (b) need to rely on Consent and/or need to capture Explicit Consent;
 - (c) are unsure about the retention period for the Personal Data being Processed;
 - (d) are unsure about what security or other measures they need to implement to protect Personal Data;
 - (e) know or suspect that there has been a Personal Data Breach;
 - (f) think they might need to transfer Personal Data outside the EEA;
 - (g) are contacted by a Data Subject seeking to exercise their rights under the DPA;
 - (h) are engaging in a significant new, or change in, Processing activity, or plan to use Personal Data for purposes other than what it was collected for;
 - (i) plan to undertake any activities involving Automated Processing including profiling or Automated Decision-Making;

- (j) need help complying with applicable law when carrying out direct marketing activities; or
- (k) need help with any contracts or other areas in relation to sharing Personal Data with third parties (including activity providers).

3. Personal data protection principles

3.1. We adhere to the principles relating to Processing of Personal Data set out in the DPA which require Personal Data to be:

- (a) processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency);
- (b) collected only for specified, explicit and legitimate purposes (Purpose Limitation);
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation);
- (d) accurate and where necessary kept up to date (Accuracy);
- (e) not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation);
- (f) processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality);
- (g) not transferred to another country without appropriate safeguards being in place (Transfer Limitation); and
- (h) made available to Data Subjects and allow Data Subjects to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

3.2. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

4. Lawfulness, fairness, transparency

4.1. Lawfulness and fairness

4.2. We will only collect, Process and share Personal Data fairly and lawfully and for specified purposes.

4.3. The DPA allows Processing for specific purposes, some of which are set out below:

- (a) the Data Subject has given his or her Consent; or
- (b) the Processing is necessary for the performance of a contract with the Data Subject; or
- (c) to meet our legal compliance obligations; or
- (d) to protect the Data Subject's vital interests; or
- (e) to pursue our legitimate interests for purposes where they are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of Data Subjects. The purposes for which we process Personal Data for legitimate interests need to be set out in applicable Privacy Notices;

4.4. The legal grounds on which we rely when Processing Personal Data are set out in our Privacy Notices, which are made available to all Data Subjects whose Personal Data we Process (and which can be found on our website).

- 4.5. If we are relying on Consent (which generally we will only be relying on in relation to those who receive our newsletter, and in relation to certain Processing of Personal Data about those attending camps, such as where we use their photographs for publicity purposes) we will make sure that the Data Subject has indicated their agreement clearly either by a statement or positive action to the Processing. We will not rely on silence, pre-ticked boxes or inactivity.
- 4.6. When processing Special Category Data or Criminal Convictions Data, we will usually rely on a legal basis for processing other than Explicit Consent or Consent if possible.
- 4.7. We will keep records of all Consents so that we can demonstrate compliance with Consent requirements. We will ensure that Data Subjects are easily able to withdraw Consent to Processing at any time and we will promptly honour any withdrawal.

5. Transparency (notifying Data Subjects)

- 5.1. We provide detailed, specific information to Data Subjects setting out the Personal Data we collect about them, how it is Processed, the grounds on which it is Processed, and how long it is retained for. This is done through appropriate Privacy Notices.
- 5.2. We will not use Personal Data for new, different or incompatible purposes from that disclosed when it was first obtained, unless we have informed the Data Subject of the new purposes and they have Consented where necessary.

6. Data minimisation

- 6.1. We will put measures in place to ensure that the Personal Data we hold is adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed.
- 6.2. No one should Process Personal Data for any reason unrelated to their duties, and when Personal Data is no longer needed for specified purposes, it will be deleted or anonymised in accordance with H&DCYC's data retention guidelines.
- 6.3. We will take steps to ensure that the Personal Data we use and hold is accurate, complete, kept up to date and relevant to the purpose for which we collected it. We will take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

7. Storage limitation

- 7.1. Personal Data will not be kept in an identifiable form for longer than is necessary for the purposes for which the data is processed.
- 7.2. The Organisation will maintain retention policies and procedures to ensure Personal Data is deleted after a reasonable time for the purposes for which it was being held, unless a law requires that data to be kept for a minimum time. These are set out in the Privacy Notices.
- 7.3. We will take all reasonable steps to destroy or erase from our systems all Personal Data that we no longer require in accordance with all H&DCYC's applicable records retention schedules and policies.

8. Security integrity and confidentiality

8.1. Protecting Personal Data

- 8.2. We will develop, implement and maintain safeguards appropriate to our size, scope and activities, our available resources, the amount of Personal Data that we own or maintain on behalf of others and identified risks (including use of encryption and Pseudonymisation where applicable). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of Personal Data. Particular care will be exercised in

protecting Special Categories of Personal Data and Criminal Convictions Data from loss and unauthorised access, use or disclosure.

- 8.3. This includes protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:
- (a) Confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it;
 - (b) Integrity means that Personal Data is accurate and suitable for the purpose for which it is processed; and
 - (c) Availability means that authorised users are able to access the Personal Data when they need it for authorised purposes.

9. Reporting a Personal Data Breach

- 9.1. The UK GDPR requires Controllers to notify any Personal Data Breach to the applicable regulator and, in certain instances, the Data Subject. This applies to any act or omission that compromises the security, confidentiality, integrity or availability of Personal Data or the physical, technical, administrative or organisational safeguards that we or our third-party service providers put in place to protect it. The loss, or unauthorised access, disclosure or acquisition, of Personal Data is a Personal Data Breach.
- 9.2. Known or suspected Personal Data Breaches should be reported immediately to the Data Protection Lead. All evidence relating to the potential Personal Data Breach should be preserved.

10. Transfer limitation

- 10.1. The UK GDPR restricts data transfers to countries outside the UK to ensure that the level of data protection afforded to individuals by the UK GDPR is not undermined. Personal Data originating in one country is transferred across borders when it is transmitted, sent, viewed or accessed in or to a different country. It is allowable to transfer data to countries which are covered by “adequacy regulations”, a list of which can be found on the ICO’s website. However, We do not envisage that there will be any need to transfer Personal Data outside the UK for H&DCYC’s purposes.

11. Data Subject's rights and requests

- 11.1. Data Subjects have rights when it comes to how we handle their Personal Data. These include rights to:
- (a) withdraw Consent to Processing at any time;
 - (b) receive certain information about the Data Controller's Processing activities;
 - (c) request access to their Personal Data that we hold;
 - (d) prevent our use of their Personal Data for direct marketing purposes;
 - (e) ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or processed or to rectify inaccurate data or to complete incomplete data;
 - (f) restrict Processing in specific circumstances;
 - (g) challenge Processing which has been justified on the basis of our legitimate interests or in the public interest;

- (h) request a copy of an agreement under which Personal Data is transferred outside of the UK;
 - (i) object to decisions based solely on Automated Processing, including profiling;
 - (j) prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else;
 - (k) be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms;
 - (l) make a complaint to the supervisory authority; and
 - (m) in limited circumstances, receive or ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine-readable format.
- 11.2. Any request by a Data Subject in relation to these rights should be immediately forwarded to the Data Protection Lead. We may need to take steps to verify the identity of an individual requesting data under any of the rights listed above.

12. Record-keeping and Training

- 12.1. We will maintain accurate records of all our data Processing activities. We are required to ensure all volunteers handling Personal Data on behalf of H&DCYC have undergone adequate training to enable them to comply with data privacy laws. We must also regularly test our systems and processes to assess compliance. If you are processing Personal Data for H&DCYC and you feel like you would benefit from additional training/guidance, please contact the Trustees.

13. Privacy by Design and Data Protection Impact Assessment (DPIA)

- 13.1. We are required to implement appropriate technical and organisational measures when Processing Personal Data to ensure compliance with data privacy principles.
- 13.2. We will assess what measures can be implemented on all programmes, system or processes that Process Personal Data by taking into account the following:
- (a) the state of the art;
 - (b) the cost of implementation;
 - (c) the nature, scope, context and purposes of Processing; and
 - (d) the risks of varying likelihood and severity for rights and freedoms of Data Subjects posed by the Processing.
- 13.3. We will generally not be undertaking any high-risk Processing, and a DPIA will be conducted wherever Processing is considered to be high-risk. If a DPIA is required, it should always be reviewed and signed off by the Trustees.

14. Automated Processing (including profiling) and Automated Decision-Making

- 14.1. Automated Processing describes any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. Profiling is an example of Automated Processing. Automated Decision-Making (ADM) is when a decision is made which is based solely on Automated Processing (including profiling) which produces legal effects or significantly affects an

individual. The GDPR prohibits Automated Decision-Making (unless certain conditions are met) but not Automated Processing

- 14.2. Save for the allocation of campers into Camps according to their age, we do not intend to carry out any Automated Processing or Automated Decision-Making. This allocation may be subject to review by the Overall Leaders of the relevant Camp and/or the Trustees if requested in any individual situation. If any other Automated Processing and/or Automated Decision-Making is being considered, a full Data Protection Impact Assessment will be undertaken and consideration will be given to the provisions of the UK GDPR in this respect.

15. Direct marketing

- 15.1. We are subject to certain rules and privacy laws when marketing to people who may want to attend/send their children to a camp run by H&DCYC.
- 15.2. For example, a Data Subject's prior consent is required for electronic direct marketing (for example, by email, text or automated calls). The limited exception for existing contacts known as "soft opt in" allows organisations to send marketing texts or emails if they have obtained contact details in the course of a sale to that person, they are marketing similar products or services, and they gave the person an opportunity to opt out of marketing when first collecting the details and in every subsequent message.
- 15.3. The right to opt-out of receiving emails from H&DCYC should be explicitly offered on each email (e.g. by an "unsubscribe" button). Any opt-out must be promptly honoured. If anyone opts out of receiving marketing emails at any time, their details should be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.

16. Sharing Personal Data

- 16.1. Generally, we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.
- 16.2. Personal Data will only be shared with trustees, administrators, leaders or other representatives of H&DCYC who have a role-related need to know the information.
- 16.3. The Personal Data we hold will only be shared with third parties, such as activity providers and our database-provider (ChurchSuite), if:
- 16.4. they have a need to know the information for the purposes of providing the contracted services;
- 16.5. sharing the Personal Data complies with the Privacy Notice provided to the Data Subject;
- 16.6. the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- 16.7. the transfer complies with any applicable cross border transfer restrictions; and
- 16.8. a fully executed written contract that contains GDPR-approved third party clauses has been obtained (this may just be the service providers standard terms and conditions, so long as they contain appropriate UK GDPR wording).

17. Changes to this Data Protection Policy

- 17.1. We keep this Data Protection Policy under regular review. This version was last updated in May 2023. This Data Protection Policy does not override any applicable national data privacy laws and regulations.

GLOSSARY:

Consent: agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear positive action, signify agreement to the Processing of Personal Data relating to them.

Controller: the person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with the UK GDPR. We are the Controller of all Personal Data relating to those attending our camps, and the recipients of our newsletters/supporters.

Criminal Convictions Data: means Personal Data relating to criminal convictions and offences and includes personal data relating to criminal allegations and proceedings.

Data Subject: a living, identified or identifiable individual about whom we hold Personal Data. They may be nationals or residents of any country and may have legal rights regarding their Personal Data.

Data Privacy Impact Assessment (DPIA): tools and assessments used to identify and reduce risks of a data processing activity. DPIAs should be conducted for all major system or organisation change programmes involving the Processing of Personal Data.

Explicit Consent: consent which requires a very clear and specific statement (that is, not just action).

Personal Data: any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Special Categories of Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

Privacy Notices: separate notices setting out information that may be provided to Data Subjects when H&DCYC collects information about them.

Processing or Process: any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

Pseudonymisation or Pseudonymised: replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

Special Categories of Personal Data: information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

UK General Data Protection Regulation (UK GDPR): the UK General Data Protection Regulation, being Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (and see section 205(4)). Personal Data is subject to the legal safeguards specified in the UK GDPR.

This policy was reviewed in May 2023