

PRIVACY IMPACT ASSESSMENT (PIA)

Schools & Youth Groups

In Your Element and *TreeZone* provide amazing outdoor experiences across Scotland.

Why do we need a PIA?

By their very nature, many of the activities that we offer are physically challenging outdoor experiences often taking place in remote locations and can present a certain element of risk. It is for this reason that it will be necessary to obtain personal information regarding individual participants to ensure the safety and comfort of all of our clients. This information can be of a sensitive nature such as food allergies and medical details. It is important that our clients have confidence in how we will collect, process and delete this information.

Obtaining, Use and Deletion of Personal Information – Activity Programmes

Personal information regarding individuals will be sought from the activity organiser (e.g. teacher) to ensure the safety and comfort of all participants. Name, age, medical details, special needs, food allergies will be requested as appropriate to the activity. This information will be used solely for the planning and execution of the group's programme of activities to ensure the safety, comfort and enjoyment of our activities by all participants.

The information will be provided, usually electronically, at the later planning stages of the programme. The details will be provided to the activity instructor in paper form before the activity programme commences. Upon completion of the group booking, the electronic and paper based information will be permanently deleted. This will impact approx. 1,000 clients per annum.

Acknowledgement of Risk (AOR) Forms

Participants are required to complete a paper AOR prior to commencement of certain activities, this includes the participant's name, address and age (if under 18 years old). These forms are stored securely for the duration required in order to comply with our insurers policy. These forms will be destroyed following the end of the relevant insurance retention period.

CONSULTATION REQUIREMENTS

We consulted with Ledingham Chalmers as CBP advisers in preparation for GDPR.

The Director (Commercial) will undertake the internal consultation requirements on systems or procedure related issues.

The Director (Operations) will be the internal consultation for all instructor staff in the first instance.

We will consult externally with our legal advisers should the situation occur.

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PRIVACY AND RELATED RISKS

The GDPR responsibilities of the organising body e.g. school or youth group should ensure that they only share with us the necessary information on individual participants. A very limited amount of personal information is necessary to ensure that **participants' safety and comfort is maintained during the activity programme.**

Any non-compliance by our staff will cause us **reputational damage** and result in a **loss of trust** in us by our clients. We are very proud of our reputation and strive to maintain the high level of trust and respect our team has built with clients over the years.

The following **Risk Issues** have been identified with the **risk to the individual** and our **safeguards** to minimise any form of potential harm to any activity participants. All risk issues are considered to be of an **extremely low level** to cause any type of harm to participants.

1. Inappropriate activity participation due to receiving inaccurate, incomplete or out of date information.
 - ⇒ Our instructors are highly qualified and trained in providing outdoor activities to a wide range of ages and abilities.
 - ⇒ Our instructors will adapt and change their activity plan should an individual be unable to participate fully and safely within our Risk Assessment and Safety Procedures. This may involve ending the activity session.
2. Inappropriate or excessive information provided; information disclosed which an individual did not wish it disclosed or information used in an unacceptable manner or in an unexpected way—individuals may feel embarrassed by the disclosures and result in a lack of self-confidence especially within their peer group
 - ⇒ The Director (Operations) will review all participant information provided by a school/youth group. Any inappropriate/unnecessary information will be destroyed before sharing with our instructors
 - ⇒ An individual's information will never be shared by instructors, all information is destroyed following the completion of the activity programme
 - ⇒ Our instructor monitoring processes and PVG disclosure checks ensure that our instructors are of the highest calibre and extremely trustworthy
3. Information is not stored securely, which could lead to inappropriate disclosure of sensitive information
 - ⇒ We do not store any personal information on individual school or youth group participants in our systems
 - ⇒ All information received is destroyed following the completion of the activity programme