## **GDPR Policy.**

Addventure Awards Ltd (AAL) provide various education packages including, but not limited to-

Duke of Edinburgh's Award (DofE) expeditions for all levels of the award, AAL provided training, support and assessment for participants.

Various hills skills including navigation and First Aid Courses.

Addventure Awards Ltd incorporate M Clarke Training (MCT) providing various training packages including, but not limited to-

A large range of First Aid, Food and Fire Safety courses.

AAL/MCT gains clients via word of mouth, advertising in relevant publications, owns a web site, and uses social media. Only material that has been given permission by the subject is used publicly.

AAL/MTC are able to deliver regulated courses through Awarding Organisations (AO) such as Highfield ABC, ITCFirst, DofE, etc. these companies/organisations can be contacted directly by an individual to enquire on the type of information of theirs being held. This information will be protected by the AO's own GDPR policy.

AAL delivers these packages using a pool of regular freelance instructors and assessors. Where extra staffing is required, recommendations from existing pool are sought, the role is then advertised more widely. When a new instructor is taken on, the induction procedure is followed; this includes, CV and all relevant certificates being checked, a conversation via phone, video or in person with applicant and AAL MD or representative. The new member of the team will then work on an event under existing instructors and the Event Manager, after this they will be placed on the mailing list for future events. All freelance team members are given the option of 'opting out' from future mailings.

All AAL instructors fill in an online form, elements of this form direct them to key documents i.e. emergency procedures, safeguarding policies, risk assessments and GDPR policy – this form is 'signed' by the instructor with their email address..

Addventure Awards Managing Director (AAL MD) is the Information Controller.

Paper data is destroyed using an office shredder and/or burning.

Electronic data is destroyed by deletion and followed by purging of both live files and back up files.

## How can a "subject of data" make a complaint/enquiry (Subject Access Request)?

The "subject of data" may make a complaint/enquiry (this could include how their information is used i.e. marketing, etc.) initially to Addventure Awards Managing Director in writing, to <a href="mailto:info@addventure.co.uk">info@addventure.co.uk</a>. This email will be replied to within 48hrs (where possible) with an indication of type of data that can be provided and in what time scale.

Info held	Type of information	How / where	Protection	Why held	Disposal – Time / Method	Access	Note
Instructor details.	Name, address, email, phone number, bank account details, qualifications held, etc.	On desktop PC Google drive Company bank account. AAL MD mobile phone.	Password Password Password Unlock pattern	For mailing out requesting event staffing, follow up briefing, general communications and payment, and to check they are legally allowed to be employed in the UK.	Generally kept on file unless either AAL or the instructor wish to end the relationship.	Can be requested by the instructor at any time.	
Client details.	Name, company address, phone number of their choice, email address of their choice.	Desktop PC Google drive MS office 365 AAL MD mobile phone.	Password Password Password Unlock pattern	General communications for and on events.	Generally kept on file unless either AAL or the client wish to end the relationship.	Can be requested by the client at any time.	
Participant consent / health details.	Any health and relevant details.	Name, address, ICE contact details, medical conditions, additional needs info.	Normally hard copies kept by the Event Manager and the instructor responsible for the participant on that activity.	In order to provide a safe and fair activity to the individual. In case of emergency that may require medical treatment.	Only kept when on activity, all hard copies to be passed back to the client organisation lead person.	Can be passed on to relevant health or legal person involved with any medical event.	
Participant details.	Name and DofE number.	Desk top PC Google drive Office 365.	Password Password Password	For DofE accountability, for DofE reports.	Kept on file until participant is 25 yrs (the end of their DofE journey).	Can be requested by the participant at any time.	
Participant certificates.	Name, organisation, activity/course certificate.	Desk top PC	Password	For proof of attendance for requalifying courses. To issue in case of lost certs.	Kept on file, typically three years (usual validity of these type of courses).	Can be requested by participant or participants organisation.	

Participant reports including DofE.	Name, DofE number, and reports passed on by event assessors.	Desk top PC Google drive Office 365	Password Password Password	In case any correction is required i.e. spelling of names etc.	Kept on file for a year, then deleted.	Requested by participant or nominated representative of the participants organisation or from DofE head office.	
Participant reports including DofE numbers	Name & DofE number	Assessors working for AAL will compile reports on their own devices in order to upload to DofE or the participants organisation.	Recommended to assessors to keep their recording system secure.	In case any correction is required i.e. spelling of names etc.	It is requested by AAL to the assessor to delete within 12 months of the assessment.	Requested by participant or nominated representative of the participants organisation, AAL, or from DofE head office.	
Interested party details (potential clients).	Name, phone number, email address they have contacted us on.	Desktop PC AAL MD mobile phone.	Password Unlock pattern	Following up on marketing etc.	Generally kept on file	Any individual can contact us to ask what information of theirs we have.	
Accident / incident reports.	All relevant details of the people involved in the incident.	Hard copy, kept as secure as possible on event by Event Manager, Then in locked cabinet at AAL head office.	As best as possible depending on event.  Key	Follow up review to try and prevent further occurrences, health reasons for the affected party, possible compensation claims.	Kept on file, minimum of three years, or as long as necessary depending on age and/or severity of incident.	Any individual directly involved can ask for any element directly involving them, and health or legal request by authorised parties.	

Financial details.	AAL financial details	Ltd company, details are public record. All other details, either held by accountant or Desktop PC Company bank account Google Drive Microsoft 365 AAL MD mobile phone.	Their GDPR Password Password Password Unlock pattern, then passwords to relevant apps.	For accounting purposes.	Kept on file for 7 years, then securely disposed of.	Anybody with reasonable authority can with legal reason seek access to accounts.	
Service provider details.	All relevant details provided by the supplier, address and contact details, as well as details on services provided.	As provided by the supplier.	Desktop PC AAL MD mobile phone Hard copies of marketing material.	Password Unlock pattern No requirement for security	Usually kept on file.	Any individual can contact us to ask what information of theirs we have.	

Last review – July 2023, Mark Clarke, Managing Director Addventure Awards Ltd