



# Camp JoJo Data Protection Policy 2025

## 1. Introduction

Camp JoJo (CJJ) is committed to protecting the privacy and rights of individuals whose personal data CJJ collect and process. This policy sets out how CJJ comply with the UK GDPR and the Data Protection Act 2018, and how CJJ demonstrate accountability.

## 2. Who We Are (Data Controller)

- **Organisation:** Camp JoJo (Registered Charity No. 1189163)
- **Address:** Ivy Farm, Ivy Lane, East Mersea, Colchester, CO5 8US
- **Data Protection Lead:** Paul Hocker
- **Contact:** paul@campjojo.org.uk | 07961 933 613

CJJ are the data controller for all personal data processed under this policy.

## 3. What Data CJJ Collect

CJJ collect, where relevant and necessary:

- Identity & contact data (name, address, phone, email)
- Date of birth (children / participants)
- Emergency contacts
- Medical, dietary, accessibility, disability information
- Photographs / video (with consent)
- Volunteer applications, including DBS checks
- Donation, payment, and financial records

CJJ only collect data that is relevant, adequate, and limited to what is needed.

## 4. Purposes of Processing & Use of Data

CJJ process personal data to:

- Organise and run safe, inclusive camps
- Communicate booking confirmations, updates, and emergencies
- Manage volunteers and staff
- Process donations, payments, and fundraising
- Fulfil legal, regulatory, or safeguarding obligations
- Send newsletters, appeals, and updates (where consent or legitimate interest applies)

CJJ will not use data for purposes incompatible with those initially communicated.

## 5. Lawful Reasons for Using Data (UK GDPR – Article 6)

Camp JoJo may use your data because:

- **Contract** – we need it to manage bookings and provide camp services.
- **Legal obligation** – we must keep some records (e.g. safeguarding, tax, HMRC).
- **Vital interests** – to protect someone in an emergency (e.g. medical care).
- **Legitimate interests** – for things like supporter updates, only where this is fair and balanced against your rights. We will always do a **Legitimate Interests Assessment (LIA)** before relying on this.
- **Consent** – for optional things, such as photos and newsletters. You can withdraw consent at any time.

## Special Category Data (Sensitive Data – UK GDPR Article 9 / DPA 2018)

Some data (e.g. medical, dietary, or accessibility needs) is classed as **special category data**.

- We rely on **explicit consent** or lawful exceptions (such as protecting health or safeguarding).
- This data is given **extra protection**: restricted access, secure storage, encryption, and collected only when necessary.

## 6. Data Retention

Data includes personal details such as health information, as well as photography and video consent for internal use only. We may ask permission for photography and video use for occasional promotional material. Individuals can withdraw or modify from CJJs' outlined duration for keeping their data at any point. Camp JoJo will respond to rights requests within **1 month** of receipt.

We will take care of your data for the following durations.

<b>Children</b>	Up to the age of 18 years of age for the child with complex needs or five years after their last camp.
<b>Families and siblings</b>	To coincide with their child with complex needs turning 18 or five years after the family's last camp.
<b>Volunteers</b>	5 years
<b>Subscriptions to Camp Jojo News, Events, etc.</b>	10 years

**Data may be anonymised, removing all risk of identification for the purposes of statistical data to help us improve our services.**

## 7. Consent and Children's Data

- Consent will be freely given, specific, informed, and unambiguous, and can be withdrawn easily.
- For online services, children aged 13+ may consent; under 13 requires verified parental/guardian consent.
- For offline collection, CJJ assess competence and involve parents/guardians where appropriate.
- Children have the same rights as adults where competent; otherwise, parents/guardians may exercise rights on their behalf.

## 8. Data Sharing / Disclosure

CJJ never sell personal data. CJJ may share with:

- Healthcare professionals in emergencies
- Trusted service providers under Data Processing Agreements
- Regulatory or safeguarding authorities as required by law

CJJ ensure all third parties use appropriate safeguards and act only under our instructions.

## 9. Retention, Review & Deletion

CJJ retain data only as long as necessary:

- Booking / medical forms: camp duration + 7 years
- Financial / donation records: 6 years (or longer if legally required)
- Volunteer / staff records (including DBS): 7 years
- Photography / video: until consent withdrawn or for a limited period

At the end of the period, data will be securely deleted or anonymised. Retention schedules are reviewed annually.

## 10. Security & Access Controls

CJJ maintain appropriate technical and organisational measures:

- Password-protected, role-based access systems
- Encryption where relevant
- Secure backup and disposal processes
- Locked storage for paper files
- Training for staff/volunteers on data protection
- Periodic security reviews and audits

## 11. Data Breach & Incident Response

CJJ will:

- Record all personal data breaches
- Notify the ICO within 72 hours where required
- Notify affected individuals if high risk
- Investigate, contain, and remediate breaches
- Review and improve security after incidents

## 11. Accountability & Governance

CJJ will:

- Maintain Records of Processing Activities (ROPA)
- Provide training, audits, and regular reviews
- Carry out Data Protection Impact Assessments (DPIAs) where high risk
- Regularly update this policy

## 12. Individuals' Rights

You have the right to:

- **Access your personal data** (make a subject access request).
- **Rectify** inaccurate or incomplete data.
- **Request erasure** of your data (where lawful).
- **Restrict or object** to the use of your data.
- **Withdraw consent** at any time (this will not affect camp participation).
- **Lodge a complaint** with the Information Commissioner's Office (ICO).

### Response Times (Statutory Deadlines)

- **Standard deadline:** Camp JoJo will respond to rights requests within **1 month** of receipt.
- **Extensions:** Where requests are complex or numerous, this may be extended by up to **2 additional months**. We will inform you within the first month if an extension is needed.
- **Direct marketing objections:** If you object to receiving marketing, this will stop **immediately**.
- **Withdrawing consent:** This will be actioned **without undue delay**.

Camp JoJo is committed to handling all rights requests fairly, transparently, and within the timescales set by the UK GDPR and Data Protection Act 2018.

## 13. International Transfers

If personal data is transferred outside the UK, CJJ will ensure adequate safeguards (e.g. standard contractual clauses, adequacy decisions) and inform individuals where relevant.

# 6 GOLDEN RULES OF DATA PROCESSING

1

## LAWFULNESS, FAIRNESS & TRANSPARENCY

Data must be processed lawfully, fairly, and in a transparent way in relation to individuals.

2

## PURPOSE LIMITATION

Data must be collected for specific, explicit, and legitimate purposes, and not used in ways incompatible with those purposes.

3

## DATA MINIMISATION

Data must be adequate, relevant, and limited to what is necessary for the stated purposes.

4

## ACCURACY

Data must be accurate and kept up to date; inaccurate data must be erased or corrected without delay.

5

## STORAGE LIMITATION

Data must not be kept longer than necessary; longer storage is only allowed for archiving, research, or statistical purposes under safeguards.

6

## INTEGRITY & CONFIDENTIALITY (SECURITY)

Data must be processed securely, protected against unauthorised access, unlawful processing, accidental loss, destruction, or damage.

## Glossary of Key Terms – Camp JoJo GDPR / Data Protection Policy

**Personal Data** – Any information that can identify an individual (e.g., names, contact details, medical information).

**Special Category Data** – Sensitive information such as medical, dietary, or accessibility needs, which requires extra protection.

**Data Controller** – The organisation (Camp JoJo) that decides how and why personal data is collected and used.

**Data Protection Lead (DPL)** – The person responsible for overseeing data protection at Camp JoJo (currently Paul Hocker).

**UK GDPR** – The UK's General Data Protection Regulation, which sets rules on how personal data must be handled.

**Data Protection Act 2018** – UK law that works alongside GDPR to protect personal information.

**Lawful Basis** – The legal reasons Camp JoJo uses personal data, such as:

- **Consent** – Permission given (e.g., for photos or newsletters).
- **Contract** – Needed to provide a service (e.g., bookings).
- **Legal Obligation** – Required by law (e.g., safeguarding, HMRC).
- **Vital Interests** – Protecting someone in an emergency (e.g., medical care).
- **Legitimate Interests** – Using data in ways people would expect (e.g., supporter updates).

**DBS Check** – A criminal record check for volunteers and staff to ensure safeguarding.

**Safeguarding** – Protecting children and vulnerable people from harm, which may require sharing personal data with authorities.

**Data Retention** – How long Camp JoJo keeps personal information before securely deleting or anonymising it.

**Data Sharing** – When personal data is passed to trusted third parties (e.g., doctors in emergencies, service providers) but never sold.

**Data Security** – Measures to keep data safe, such as passwords, locked storage, limited access, and staff training.

**Your Rights** – Legal rights under UK GDPR:

- Access your data
- Correct inaccuracies
- Request deletion (where lawful)
- Restrict or object to processing
- Withdraw consent
- Complain to the **ICO (Information Commissioner's Office)** – The UK's regulator for data protection and privacy rights.

This policy was reviewed at the full Board Meeting on 6/11/25, and approved by the Board.

Next review due on 5/11/26

Signed.....*C. J. Hocker*.....(Chair).....*T. Spencer*.....  
(Secretary)