



## **CAST Angling Project – Data Protection and GDPR Policy**

Reviewed on 20<sup>th</sup> August 2025

To be reviewed on 19<sup>th</sup> August 2026

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### **Introduction**

*CAST takes, very seriously, its responsibilities concerning the protection of information and data supplied and how it is collected, used, stored and erased.*

The Data Protection Act 1998 has now been replaced by the EU Data Protections standards General Data Protection Regulations 2018 and a new set of legislation designed to reform the Legal Framework for ensuring the right of EU residents to a private life. Data Protection runs in a very similar way with added new procedures for businesses/schools to follow to ensure all Individuals have more Individual rights. Tighter regulations for those business that work with children/education.

It is designed to better control personal data. It is hoped that these modernised and unified rules will allow businesses to make the most of the digital single market by reducing regulation and benefitting for reinforcing consumer trust.

Digital technology has changed the way many organisations operate and the evolving means of collecting, storing and processing personal data has meant that laws have needed to be significantly changed to keep pace.

There are 3 types of data:

1. Personal Data – relates directly to the individual and linked directly to them.
2. Anonymous Data – has been properly anonymised cannot be traced back to the original individuals in anyway but can still be process by organisation to conduct research. Full anonymous data does NOT come under GDPR.
3. Pseudonymous Data – some data which has been properly pseudonymised, can only be connected back to an individual using a specific key or code. Extra layer of security but data is still treated as personal data under GDPR, due to possible personal identification.



## **Procedures**

Within CAST Angling Project all standards have been met in line with the May 25<sup>th</sup> 2018 start of the Legislation and Audit, Privacy Notices to Staff and Partnerships and updated Data Protection Policies and cross-referenced Policies have been implemented by a designated Data Protection Officer (DPO); some policies are still in progress. Rebecca Masson.

Monitoring will be done by the Data Protection Officer to ensure accurate data collection and storing is evident and those who have a 'Right to be Forgotten' are erased and meet the timescale given. (See CAST Retention Policy) A new reformed area of the GDPR to ensure data is managed more effectively, in our case, as the Processor. It will allow us to remove any inaccurate data within the company. Rebecca Masson to be responsible for this role and advise other staff within the provision to support and ensure that data is deleted and retained effectively.

However, everyone within CAST has a responsibility for using data and has to follow strict rules, called 'data protection principles. Making sure that all of CAST Angling Project's information is used:

- Fairness and transparency and lawfulness
- For limited, specifically stated purposes
- Used in a way that is adequate, relevant and excessive and accurate
- Kept no longer than necessary and safe and secure – storage limitation
- Integrity and confidentiality
- Not transferred outside the EU economic areas without adequate protection

Employees and volunteers have more legal protection for more sensitive information at CAST Angling Project, in relation to:

- Ethnic Backgrounds
- Political opinions
- Religious Beliefs
- Health
- Sexual Health
- Criminal Records

Staff within CAST have been made aware of the changes to the Data Protection Act for students, schools and themselves and training implemented into staff meetings; a Privacy Policy issued to all staff and school partnerships. The Privacy Policy allowing 'Greater Disclosure' and a better protection for their rights.



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As part of CAST New Staff Induction Pack the Privacy Policy will be included and informed on or after post has been given to the candidate. Staff training on GDPR and E-Safety will be ongoing.

Staff are not to disclose any personal data other than is necessary, within the terms of the organisation's notification, to carry out the role for which they are employed.

Student inductions/school referral forms will indicate now the GDPR within CAST, implemented into the systems we have. Teaching and Learning activities will be added to support the awareness and reinforcement of data protection and of ESafety at CAST.

Understanding that the change in 'purposes, description, sources, disclosures, transfers' of the personal data under their control may require an amendment to what has been notified.

Linked to this Policy are the strict guidelines and procedures for the Filming and Photography of Individuals, and in particular Children. Please refer to CAST's guidance under Photo Consent Forms.

Given below is information regarding the processing of personal data specifically as it relates to the personnel management processes of the organisation.

### **Processing of Personal Data**

The GDPR legislation continues to regulate the way in which certain data about employees and volunteers, both in paper and electronic form, is held and used. Allowing that individual now more control on their own data information.

The following will give employees/students and volunteers some useful information in terms of the type of data that CAST keeps about them and the purposes for which this is kept.

Throughout employment and volunteering and for as long as is necessary after the termination of employment, the organisation will need to process data about employees and volunteers for purposes connected with their employment, including their recruitment and the termination of their employment. See Retention/Deletion Policy for further information.

Processing includes the collection, processing, storage, sharing and erasing of data

Among many new conditions, CAST keeps a detailed record of how and when an individual gives consent to store and use their personal data. These will be met in line with the set Regulations.



All personal data presently held and informed specifying:

- A general description of security measures;
- The purpose for which the data is used;
- A description of the data and the data subjects;
- The sources and disclosures applicable to the information comprising the data; and
- The countries outside the European Economic Area to which the data is transferred (overseas transfer)

The kind of data that CAST will process includes:

- any references obtained during recruitment
- details of terms of employment
- payroll details
- tax and national insurance information
- details of job duties
- details of health and sickness absence records
- details of holiday records
- information about performance
- details of any disciplinary investigations, proceedings and outcomes
- training records
- contact names and addresses
- correspondence with the Organisation and other information that employees have given the Organisation

Within the new GDPR regulations there will be an Audit that reflects whose data we process; and reflect the direct and accurate contacts that this information is sent to. Monitoring of accurate data will be completed over the Academic Year.

Data and the audit for contacts is reviewed six monthly/yearly due to the nature of CAST's on roll system, some schools are used again and will depend on where a learner will be referred from, the audit reflects this. Data is kept on the audit as the school can be used again with the academic year. This keeps information accurate and correct for contact information. (Again Deletion/Retention Policy will explain this further)

CAST believes that those records used are consistent with the employment relationship between the organisation and its employees and volunteers and with the data protection principles. The data CAST holds will be for management and administrative use only but the organisation may, from time to time, need to disclose some data they hold about employees or volunteers to relevant third parties (e.g. where legally obliged to do so by the Inland Revenue or where requested to do so by employees or volunteers for the purpose of giving a reference.)



In some cases, the organisation may hold sensitive personal data, as defined by the legislation, about employees. For example, this could be information about a person's health, racial or ethnic origin, criminal convictions, trade union membership or political or religious beliefs. This information may be processed not only to meet the organisation's legal responsibilities but, for example, for purposes of personnel management and administration, suitability for employment and to comply with equal opportunity legislation. Since this information is considered sensitive, the processing of which may cause concern or distress, individuals will be asked to give express consent for this information to be processed, unless the organisation has a specific legal requirement to process such data. (Attachment for Schools Partnership/ESafety and information for Parents/Carers).

### **Accessibility by Employees and Volunteers**

Employees may, within a period of forty days of their written request, or where applicable, a period of forty days from the payment of the fee, inspect and/or have a copy, subject to the requirements of the legislation, of information in their own personnel file and/or other specified personal data and, if necessary, require corrections should such records be faulty. Those employees who wish to do so much make a written request to the Directors. An administration fee of £10 may be required by the organisation.

The Organisation is entitled to change the above provisions at any time at its discretion.

### **Monitoring and Review**

This Policy will be reviewed by the Senior Management Team/DPO to ensure compliance with legislation and promote good practice.

### **Relevant Policies**

- Acceptable use of Technology and E-Safety Policy
- Safeguarding Policy
- Deletion/Retention Policy
- Attendance Policy
- Safeguarding Policy