

# Data protection for Dojos

## dos and don'ts

### Why we are writing to you

Your work as a CoderDojo volunteer is extremely important to us, and we want to do what we can to make sure you continue to feel comfortable with your data protection role and responsibilities. Personal data is valuable and should be looked after appropriately. In Dojos, we collect and use personal data from young people (and their families), adult volunteers, and the public. This can be anything from names, addresses, and telephone numbers to more sensitive personal data such as religion, ethnicity, and disabilities. As a result, it's important that the adults involved in your Dojo are aware of the data protection rules and what you collectively need to do to comply with them.

### Are you a data controller?

If you, as an individual or as part of an organisation, collect, store, or process any data about living people on any type of computer or in a structured filing system, then you are a data controller. In practice, to establish whether you are a data controller, you should ask: "Do I decide what information is to be collected and stored, to what use it is put, and when it should be deleted or altered?" An example of this would be collecting the names of people as part of your role as a CoderDojo volunteer.






Most clubs are data controllers, unless they solely use data collected by another party that instructs them to process the data in specific ways.

## Responsibilities of data controllers

- 1 Obtain and process information fairly
- 2 Keep it only for one or more specified, explicit, and lawful purposes
- 3 Use and disclose it only in ways compatible with these purposes
- 4 Keep it safe and secure
- 5 Keep it accurate, complete, and up-to-date
- 6 Ensure that it is adequate, relevant, and not excessive
- 7 Retain it for no longer than is necessary for the purposes of your Dojo
- 8 Upon request, give a copy of his/her personal data to an individual

**Below we have compiled some helpful dos and don'ts to help your Dojo to comply with data protection rules.**

### Dos

-  Appoint a lead volunteer for data protection for your club who will be responsible for ensuring that all data is collected, stored, and processed correctly. They can use this document as a guide. Many people have experience of looking after personal data from other activities, and this experience would be valuable for Dojos.
-  Follow the data protection principles (see below) to guide your collection, usage, and storage of data.
-  Only collect data that is absolutely required for the running of your Dojo.
-  Only use data, including members' names and email addresses, for the purpose that you collect it for (that is, for CoderDojo).
-  Keep a record of personal data you hold, and consider the following:
  - Why is the data being held? (e.g. registration)
  - How was it obtained? (e.g. online)
  - Why was it gathered? (e.g. in order to run the Dojo, or for safeguarding purposes)
  - How long is it being retained for? (e.g. delete personal data two months after an attendee stops attending.)
  - How secure is it? (Use recognised partners and online platforms, ideally ones based in Europe.)
  - Is it shared with any third parties? (If so, minimise this to the extent necessary and keep a record of the sharing.)



- ✓ Delete/destroy any data you no longer need, and do so securely by shredding hard copies and using full digital deletion.
- ✓ Ensure all information is kept securely, e.g. Google Drive folders shared only with relevant volunteers of the Dojo, or locked cabinets where you are storing data in paper form with only relevant volunteers holding keys.
- ✓ Use strong passwords on all accounts used by your Dojo, e.g. Mailchimp, Eventbrite, Gmail. Consider saving and sharing these on a password management service such as LastPass. Do not share them with people for whom they are not essential.
- ✓ Report data security breaches where personal data is lost or stolen. If you process data that another party is responsible for, you must report any security breach pertaining to that data to this party. Assess the potential damage to the individual whose data has been lost.

## Don'ts

- ✗ Do not assume that you can take no action and be compliant with data protection regulations.
- ✗ Do not use data for purposes outside of CoderDojo activities.
- ✗ Do not collect data that you do not need.
- ✗ Do not share data with volunteers who have no need for processing it.
- ✗ Do not leave personal data on an unprotected device or outside of secure storage where it could be accessed and used by unauthorised persons.



# Data protection principles

The EU's General Data Protection Regulation sets out a number of principles which data controllers and processors must adhere to when processing personal data. These principles form the core of each data controller's obligations, and will usually be the basis of any claim that a data controller has not complied with their/its statutory duties.

- **Lawfulness, fairness, and transparency:** make sure you can justify the use of data, and be open with people and let them know what you're doing with their data.
- **Purpose limitation:** use data only in the way you need to.
- **Data minimisation:** only gather what you need for this purpose. For example, there may be good reasons to ask about the age of your participants or their gender, in order to make sure your Dojo is as welcoming as it can be.
- **Accuracy:** make sure you can update your records if data changes.
- **Storage limitation:** don't keep data for longer than necessary. Make sure that you securely delete/destroy information about attendees or volunteers who no longer come to your club or from whom you have not heard for some time.
- **Integrity and confidentiality:** use only recognised and reputable systems.
- **Accountability:** take responsibility for other people's data and understand that you have a role in protecting it.



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