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# Data Protection & Privacy Policy

1<sup>st</sup> Howden-le-Wear Scout Group

[#SkillsForLife](#)



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# About

We take the issue of Data Protection very seriously and are committed to protecting and respecting our members privacy. This Data Protection & Privacy Policy sets out our current data processing practices and procedures.

If you have any queries or concerns regarding these practices, you should speak to the Group Scout Leader or one of our section leaders.

## Data Privacy & Risk Management

**1<sup>st</sup> Howden-le-Wear** Scout Group currently comprises of Cubs and Scout Sections, Explorers/Young Leaders, as well as adult leaders and volunteers.

To provide Scouting, a voluntary service for the benefit of Young People, safely within the local community we have a legal requirement to obtain, hold and use personal data about:

- Young people and Adult Members
- Volunteers
- Enquirers
- Activity Providers/ Permit Holders

The General Data Protection Regulations (GDPR) refers to this as “processing”.

Under GDPR, for all data we process, we must:

- Have a lawful reason for collecting and processing any Personal or Sensitive Data
- Be Transparent and Accountable when Collecting and Processing Data
- Store and Transmit information in a safe and secure manner
- Have a retention policy outlining how long information will be kept for
- Have procedures to deal with any Data Subject Requests (Access, Deletion, and Correction Requests)
- Manage the Risk to the data we process (Privacy Impact Assessment)
- Report any breach / suspected breach to Personal and Sensitive Data to the ICO (where necessary)

# Information processed

As an organisation we process both sensitive and personal data about individuals. This may include, but is not limited to:

Data description	Personal data included	Stored using	Retention policy	Responsible officer(s)	Lawful Basis
Information about our adult members	Contact information, appointments, training records, activity permits and awards. (May Include sensitive data if added by Adult Member)	Compass, Locally on Mobiles and Computers	Retained whilst a current member, deleted upon leaving. A subset of data is retained (by Compass) when membership ceases to support the vetting policy should the person reapply for Membership.	Group Scout Leader / Section Leaders	Legitimate Interest (6.1.F) & Legal Obligation (6.1.C)- processing necessary to provide information and activities within Scouting as well as a legal obligation under safeguarding Legitimate Activity with Appropriate Safeguards (9.2.D)
Information about Safeguarding incidents	Contact information and information regarding the nature of any allegation	Paper, E-mail and Electronic Files (One Drive/locally)	Allegations are immediately passed to the District Commissioner for investigation and records held by Group volunteers are Deleted	Group Scout Leader / Section Leaders	Legal Obligation (6.1.C)- Processing necessary for compliance with a legal obligation under safeguarding
Information about complainants	Contact information and nature of complaint, which may contain personal data	Paper, E-mail and Electronic Files (One Drive/locally)	Indefinitely -Until matter is resolved	Group Scout Leader / Group Administrator	Legitimate Interest (6.1.F)- Processing necessary to deal with Complaint and improve Group Operations
Information about accidents and near misses	Contact details and nature of accident including witness statements which may contain personal data	Paper and Electronic Files (OneDrive/ Locally)	3 years after end of investigation: Insurers will hold some investigation reports for longer.	Group Administrator	Legal Obligation (6.1.C)- Health and Safety Regulations Obligation
Information about general enquirers	Contact information and nature of enquiry, which may contain personal data	Paper, E-mail and Electronic Files (OneDrive/ Locally)	Whilst on waiting lists, no longer than 18 <sup>th</sup> Birthday, otherwise deleted within two months	Section Leaders	Legitimate Interest (6.1.F)- Processing required to provide accessibility and equal opportunity to those waiting to join

Data description	Personal data included	Stored using	Retention policy	Responsible officer(s)	Lawful Basis
Information about our Young Members	Contact information (including parents and emergency contact details), badge records. <i>(Includes sensitive data for Yearly Census and Safeguarding- Health, Dietary Requirements and ethnicity etc)</i>	Paper, E-mail and Electronic Files (One Drive/locally)	Retained whilst a current member. Records deleted or securely shredded within two months of the member leaving the group.	Section Leaders	Legitimate Interest (6.1.F) & Legal Obligation (6.1.C)- Processing required to provide information and activities within Scouting as well as a legal obligation under safeguarding Legitimate Activity with Appropriate Safeguards (9.2.D) & Statistical Purposes (9.2.J)
		Electronically on OSM (Online Scout Manager)	Records may be kept for up to 12 months after the Young Person leaves the Group in case they decide to move onto another group or re-join.		
Consent Forms	Photography/Publicity Consent	Paper and Electronic Files (OneDrive)	Retained whilst a current member and Deleted upon leaving.	Section Leaders	Consent (6.1.A)- Explicit Consent needed to use Photos and Videos (Personal Details Form)
	Contains Sensitive Data – may include special diet and medical conditions	Paper and Electronically (OSM)	Retained for up to 2 months after the event, unless medical attention is required for an injury, in which case there may be a legal requirement to keep the data longer	Section Leaders / Leader in Charge	Legitimate Interest (6.1.F)- Processing required to safely run Scouting activity Consent (6.1.A) - required to safely take part Scouting activity Legal Obligation (6.1.C)- Information held due to legal requirement Legitimate Activity with Appropriate Safeguards (9.2.D)
E-mails	Various Personal Details	Office 365 E-mail System	Until Information is Processed or in accordance with retention policy of the information provided	E-mail Recipient	Legitimate Interest (6.1.F)- Processing required to safely run Scouting activity Legal Obligation (6.1.C)- Information held due to legal requirement

Data description	Personal data included	Stored using	Retention policy	Responsible officer(s)	Lawful Basis
Finances/ Accounts	Record of payments made and by whom, invoices, bank paying in counterfoils, bank statements, remittance advices, correspondence regarding donations, bank reconciliation and gift aid records (Names and Addresses)	Paper, Office 365 and One Drive, Electronically (Online Banking)	7 years	Group Treasurer	Legal Obligation (6.1.C)- Processing required for Tax Purposes

# Communication of Information

We may sometimes need to share this sensitive and personal information. Where necessary we may share information with:

- Adult Members and Volunteers
- Healthcare, Social and Welfare Organisations
- Our Insurers
- Third Party Service/Activity Providers
- Other parts of the Scout Association

We will not do so unless necessary and only for the following reasons:

- Census Gathering
- Safeguarding Purposes
- Insurance Cover (Visits Abroad, etc.)
- Events or Activities provided by Third Party Providers (Including within The Scout Association; District, County, etc.)

# Information Storage

Records about adult members and volunteers are held centrally by the Scout Association on Compass, a Membership Management System.

We only hold information locally necessary to enable contact such as E-mail Addresses and Telephone numbers.

Records are held electronically on secure databases on our behalf by third party service providers, these are, and their Privacy Policies can be found at:

- Compass - <https://members.scouts.org.uk/supportresources/1861/data-protection-and-scouting?cat=55,400&moduleID=10>
- Online Youth Manager Ltd. - <https://www.onlinescoutmanager.co.uk/cookies.html>
- Office 365 and One Drive - <https://products.office.com/en-gb/business/office-365-trust-center-privacy>

# Consent

Where we do not have another lawful basis to hold or process data, we will seek the express consent of individuals to hold and process data about them. This will be by specific and unambiguous statements that must be opted-into on any forms (electronic or otherwise) and systems. In some circumstances due to the organisation of the Scouts, we ask our members to ensure they have express consent for the data they are submitting to us.



# Security Policy

The following security policies will apply to the storing of all personal and sensitive data as outlined. These security policies are mandatory.

## General Security

**Need to know** – We only give people access to the data that they need to carry out their role. If people change roles, we review access accordingly.

**Passwords** – Strong passwords should be used that are, at least 8 Characters long containing at least one Lowercase letter, one Uppercase letter and one Numerical digit. This should be changed regularly or when you think the password has been compromised.

**Commercially available software** – where possible we use third party software to store personal data, where the software is regularly testing and patched for security vulnerabilities.

**Transporting data** – We only transport data using physical media if it is deemed necessary and then using encrypted media only.

**Education** – We will run a yearly awareness session for volunteers about their obligations under this policy and general IT Security awareness.

**Accountability** – We are all responsible for ensuring we comply with GDPR and Security measures that are in place.

## Physical storage

**Limiting storage** – We limit the amount of personal data we physical store to the absolute minimum. Only those with a need to know will have access to the data.

**Locked** – Physical documents containing personal data will be store in a locked cabinet.

## Equipment

**Virus** – A virus scanning service must be installed on all devices and regularly checked.

**Encryption** – All devices are disk encrypted with disk encryption, such as BitLocker or VeraCrypt.

**Removable storage** – Removal devices that will contain personal data should be encrypted using Software, such as BitLocker or VeraCrypt.

## E-mails

**System** - Our volunteers should only use the Office 365 email system and their Group e-mail address as their method for receiving, storing and sending of emails, and when they are transmitting personal data.

**Virus, Malware and Phishing protection** – All emails will be scanned for virus, malware and phishing.

**IT security** - We rely upon the [IT security provisions of Office 365](#) to provide an adequate level of security for our needs.

## Third parties

**Third party processing** – We limit the use of third parties to process personal data collected by our Group.

### Current Third-Party Processors –

- Online Scout Manager –Used to securely store and process Young Members data. Compliance last reviewed on 13<sup>th</sup> May 2018.
- Office 365 and One Drive – Used to securely store and process files that may contain personal data. Compliance last reviewed on 13<sup>th</sup> May 2018
- Compass – Used to securely store and process Adult Members data. Compliance last reviewed on 13<sup>th</sup> May 2018.

**Third party compliance** – We ensure third parties we contract with to store personal data comply with the principles of this policy, have an information security policy in place and ideally hold an information security standard (such as ISO 27001).

**Limiting exports** – When exporting data from third party systems (e.g. Compass, OSM), we only export the data we need for a specific purpose, such as safeguarding and safety.

**Online Forms** – When collecting feedback or information through online forms we use Office 365 Application “Forms” which is covered under the [IT security provisions of Office 365](#) and complies with GDPR.

## Website Policy

TBC – Facebook Page and Associated Groups Policy

## Photography/Publicity Policy

During Scouting events and activities, members of the Scout Association, Adult Members, parents and members of the public may be using photography to remember or publicise the event.

**1<sup>st</sup> Howden-le-Wear** Scout Group will only use photos and videos of young people in the way we have signed consent for and in accordance with Scout Association guidelines, however, we cannot take responsibility for the use of pictures taken by District, County, Parents or members of the public.

Photo/Publicity consent for **1<sup>st</sup> Howden-le-Wear** Scout Group is given on the New Starter Personal Details Form and kept in accordance with the Retention Policy.

## Data Subject Access Request

Should you wish to enquire about any data **1<sup>st</sup> Howden-le-Wear** Scout Group processes about you or your young person or to make a request for a copy of this information, you should contact the Group Scout Leader/Administrator by email to [enquiries@1sthowdenlewear.org.uk](mailto:enquiries@1sthowdenlewear.org.uk), outlining the personal data you are seeking to obtain.

We will acknowledge your request and we will respond within one month of receiving it, in some cases we may need to verify your identity and ask you to clarify the data you are seeking to obtain.

# Deletion Request

Should you wish us to erase any sensitive or personal information that **1<sup>st</sup> Howden-le-Wear** Scout Group holds about you or your Young Person, please contact the Group Scout Leader / Administrator by email to [enquiries@1sthowdenlewear.org.uk](mailto:enquiries@1sthowdenlewear.org.uk).

We will acknowledge your request, confirm whether we hold the information and whether we are able to erase it and finally confirm to you once we have erased it.

This will all happen within one month; however, we may need to verify your identity and ask you to clarify the data you are seeking to erase before we can do this.

We will consider each request on a case-by-case basis and whilst we will not seek to refuse your request unreasonably, we do have several statutory obligations that we must comply with.

These include our vetting and safeguarding procedures, which may prevent us from being able to fully erase your personal data, and for Tax purposes which we must retain for 7 Years.

# Correction Request

Should you believe that the personal data we hold about you or your young person may be inaccurate, you can contact the Group Scout Leader / Administrator by email to [enquiries@1sthowdenlewear.org.uk](mailto:enquiries@1sthowdenlewear.org.uk), outlining the inaccuracy and providing the correct data.

We will acknowledge your e-mail and seek to address the inaccuracy and confirm back to you once it has been corrected within one month.

# Supplementary Information

The information in this policy is supplemented these additional documents:

- Data Privacy Management, Requests and Reporting Procedures
- Privacy Impact Assessment

This policy and associated documentation will be reviewed on a yearly basis or when new processes for information are being introduced.