

1st Holmer (Hereford) Scout Group Data Protection Policy and Privacy Notice

1. Introduction

The Privacy and Data Protection Policy is one of The Scouts' key policies. The 1st Holmer (Hereford) Scout Group is established as an independent small charity but we must comply with all the key policies of The Scouts. It is important to note that as a Data Controller, we are directly responsible for any personal data we process and must therefore ensure that our trustees and other volunteers are aware of our responsibility to abide by this key policy, and the law.

The Scouts' key policies can be found on its website at: [Scouts.org.uk/por/2-key-policies](https://scouts.org.uk/por/2-key-policies).

2. Purpose of this Data Protection policy and what it covers

This Data Privacy Notice/Policy describes the categories of personal data the 1st Holmer (Hereford) Scout Group process and for what purposes. The 1st Holmer (Hereford) are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

This Privacy Notice/Policy applies to members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public who will make contact with 1st Holmer (Hereford) Scout Group.

The Scout Group Executive Committee will ensure that this policy is kept up to date and reviewed at least on an annual basis.

3. Who we are

The 1st Holmer (Hereford) Scout Group are a registered charity with the Charity Commission for England & Wales; charity number 521369.

The Data Controller for the 1st Holmer (Hereford) Scout Group is the Executive Committee who are appointed at an Annual General Meeting and are Charity Trustees. The Co-Chairs of the Charity Trustees are Mrs Natalie Vernalls and Mrs Faye Evans. The Group Scout Leader is Dr Chris Brammer.

From this point on the 1st Holmer (Hereford) Scout Group will be referred to as "we".

APPROVED BY GROUP EXECUTIVE COMMITTEE 14th JULY 2020

1st Holmer (Hereford) Scout Group
Charity Number 521369 HQ Number 10012095
Holmer Scout HQ, Highmore Street, Hereford, HR4 9PG

Group Scout Leader – Dr Chris Brammer

Being a small charity, we are not required to appoint a Data Protection Officer but the Group Executive Committee has designated the Group Scout Leader as the person responsible for implementation of this policy.

4. What is personal data?

Personal data means any information about an identified or identifiable person. For example, an individual's home address, personal (home and mobile) phone numbers and email addresses, occupation, and so on can all be defined as personal data.

Some categories of personal data are recognised as being particularly sensitive ("special category data"). These include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic and biometric information, and data concerning a person's sex life or sexual orientation.

5. The data we may process

The majority of the personal information we hold is provided to us directly by you or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership system Compass. In the case of adult members and volunteers, data may also be provided by third parties, such as the England & Wales Disclosure and Barring Service (DBS),

Where a member is under the age of 18, this information will only be obtained from a parent or guardian and cannot be provided by the young person.

We may collect the following personal information:

- Personal contact details such as name, title, address, telephone numbers and personal email address - so that we can contact you.
- Date of birth - so that we can ensure young people are allocated to the appropriate Section for their age and that adults are old enough to take on an appointment with Scouting.
- Gender – so that we can address individuals correctly and accommodate for any specific needs.
- Emergency contact information - so that we are able to contact someone in the event of an emergency.
- Government identification numbers e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.
- Tax status information so that we are able to collect gift aid from HMRC where donations are made.
- Training records - so that members can track their progression through the Scout programme or adult training scheme.
- Race or ethnic origin - so that we can make suitable arrangements based on members cultural needs.
- Health records - so that we can make suitable arrangements based on members medical needs.

- Criminal records checks - to ensure Scouting is a safe space for young people and adults.

6. How does data protection apply to the 1st Holmer Scout Group?

We comply with our obligations under the GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

7. The lawful basis by which we process your data

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will mostly align to the lawful basis of legitimate activities of an association.

Explicit consent is requested from parents/guardians to take photographs of our members. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

We use personal data for the following purposes:

- to provide information about Scout meetings, activities, training courses and events to our members and other volunteers in the 1st Holmer (Hereford) Scout Group
- to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution
- to administer membership records
- to fundraise and promote the interests of Scouting
- to manage our volunteers
- to maintain our own accounts and records (including the processing of gift aid applications)
- to inform you of news, events, activities and services being run or attended by the 1st Holmer (Hereford) Scout Group
- to ensure and evidence your suitability if volunteering for a role in Scouting
- to contact your next of kin in the event of an emergency
- to ensure you have and maintain the correct qualifications and skills.

We use personal sensitive (special) data for the following purposes:

- for the protection of a person's health and safety whilst in the care of the 1st Holmer (Hereford) Scout Group
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting.

8. Our data retention period

We will keep certain types of information for different periods of time in line with our retention policy. When a member leaves Scouting we will usually keep hold of the records we have for 12 months. This is just in case the young person changes his/her mind and decides to come back—otherwise, once the records are deleted, all the badge records are lost. This also allows us to send out information about District Awards events, which may happen several months after the member has gained an award.

If you would rather we deleted the information sooner, we will do so on your instruction.

The Scout Association's Data Protection Policy can be found www.Scouts.org.uk/por/2-key-policies and the Data Privacy Notice at <https://www.scouts.org.uk/about-us/policy/data-protection-policy/>.

9. Information that we share

9.1. Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment in the 1st Holmer (Hereford) Scout Group.

We will, however, share the personal data of youth members and their parents/guardians with The Scout Association Headquarters for the purpose of managing safeguarding cases, should the need arise. The privacy and security notice for The Scout Association can be found here: <https://www.scouts.org.uk/DPPolicy>

The sharing of this data will be via the Online Scout Manager platform which is used by the 1st Holmer (Hereford) Scout Group to manage youth membership. The privacy and security notice for OSM can be found here:

<https://www.onlinescoutmanager.co.uk/security.html>

9.2. Adult volunteers

We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association for the 1st Holmer (Hereford) Scout Group as well as with The Scout Association Headquarters as data controllers in common.

9.3. All data subjects

We will however share your personal information with others outside of the 1st Holmer (Hereford) Scout Group where we need to meet a legal obligation. This may include The Scout Association and its insurance subsidiary (Unity Insurance Services), local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.

We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so.

We will never sell your personal information to any third party.

Sometimes we may nominate a member for national awards, (such as Scouting awards or Duke of Edinburgh awards) and such nominations would require us to provide contact details to that organisation.

Where personal data is shared with third parties we will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR and DPA 2018.

10. Where we store personal data and how we keep it secure

We generally store personal information in the following ways:

Compass - is the online membership system of The Scout Association, this system is used for the collection and storage of adult volunteer personal data.

Online Scout Manager - is the online membership system of Online Youth Manager, this system is used for the collection and storage of youth member personal data.

In addition adult volunteers will hold some personal data on local spreadsheets/databases.

Our adult volunteers will:

- Ensure personal data relating to members and volunteers is usually only stored on the membership database or OSM, and downloaded onto electronic devices/PCs/laptops only when absolutely necessary for the safe and proper functioning of Scouting, deleting as soon as no longer needed.
- Only ever use other data storage systems (such as cloud systems) which are GDPR compliant as data processors, and only for limited purposes. Access to these systems will be strictly limited by need.
- Minimise the use of paper records to those circumstances where it is absolutely necessary (e.g. to meet the requirements of our In Touch process), and always keep paper records containing personal data secure and restricted to those who need access.
- Never carry personal data on USB memory sticks or other portable media.
- Keep all personal data secure when travelling, even over short distances.
- Take extra care if sending any personal data by post, only doing so when absolutely necessary.
- Make sure that when sending personal data by email this is appropriately authenticated, sent to the correct recipient and password protected.
- Not send financial or sensitive information by email unless it is encrypted.
- Ensure all electronic devices are password protected and will not share passwords to devices or systems with anyone else.

Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example:

- Gift Aid administration
- Event registration
- Health and contact records forms (for events)
- Events coordination with event organisers

Paper records for events are used rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available. We will minimise the use of paper to only what is required for the event.

11. Further Processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

12. Responsibilities

We expect our all our volunteers to keep to the guidelines as set out in this Data Policy and under ICO and GDPR guidance when they are using or processing personal data and other confidential or sensitive information.

All volunteers undertake mandatory GDPR training to ensure that they are aware of the above rules and the Group Executive Committee and other volunteers receive regular updates and reminders coordinated by the GSL.

13. How we make this privacy notice available to you

A link to this website page is provided to those whose data is being processed by us. A printed version is also available on request.

14. Rights to accessing and updating personal data

As a Data Subject, you have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the Information Commissioner's Office (www.ico.org.uk).

Unless subject to an exemption under the GDPR and DPA 2018, you have the following rights with respect to your personal data:

- The right to be informed – you have a right to know how your data will be used by us.
- The right to access your personal data – you can ask us to share with you the data we have about you. This is a Data Subject Access Request.
- The right to rectification – this just means you can update your data if it's inaccurate or if something is missing. Adult members will be able to edit and update some information directly on The Scout Association's Compass membership system.

- The right to erasure – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held by The Scout Association for legal reasons.
- The right to restrict processing – if you think that we are not processing your data in line with this privacy notice then you have the right to restrict any further use of that data until the issue is resolved.
- The right to data portability – this means that if you ask us we will have to share your data with you in a way that can be read digitally – such as a pdf. This makes it easier to share information with others.
- The right to object – you can object to the ways your data is being used.
- Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by us.

15. Subject access requests

You are entitled to ask us, in writing, for a copy of the personal data we hold about you. This is known as a subject access request (SAR). In line with legislation, we will not charge a fee for this information and will respond to your request within one calendar month. This is unless this is not possible or deemed excessive, in which case we will contact you within the month of making the SAR to state the reason for the extension and/or the charging of an appropriate fee.

16. Further information and contacts

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact us by talking to your child's section leader or contacting the Group Scout Leader, Dr Chris Brammer:

- By email GSLHolmerHereford@gmail.com
- By telephone 07773 777861 or 01432 270755
- By post to 31 Scudamore Street, Hereford HR4 0HN

17. Review date

This policy/privacy notice will be reviewed and, if necessary, revised at least annually by the 1st Holmer (Hereford) Scout Group Executive Committee.

Version no. 2.0

Date approved 14th July 2020