

This policy describes the categories of personal data 1st Crowmarsh Gifford Scout Group process and for what purposes.

1st Crowmarsh Gifford Scout Group are committed to collecting and using such data fairly and in accordance with the requirements of the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

This Policy applies to members, parents/guardians of youth members, volunteers, supporters, donors and members of the public who will make contact with 1st Crowmarsh Gifford Scouts.

### Policy Explanation

#### 1. Who we are

1st Crowmarsh Gifford Scout Group is an excepted charity by the Charity Commission for England and Wales, and as such have no requirement to register with the Charity Commission.

The Data Controller for 1st Crowmarsh Gifford Scout Group is the Trustee Board who are appointed at an Annual General Meeting and are Charity Trustees. The Chair of the Trustees is Ross Edmonds, who can be contacted via the [Contact Us Page on the website](#).

From this point on 1st Crowmarsh Gifford Scout Group will be referred to as “we”.

We have access to a volunteer within the Thames Chiltern Scout District filling the role of Data Lead.

#### 2. 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 systems. The privacy and security notice for our youth membership system (OSM – Online Scout Manager) can be found at <https://www.onlinescoutmanager.co.uk/security.html>.

In the case of adult members and volunteers, data may also be provided by third parties, such as the Disclosure and Barring Service for England and Wales (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.
- Bank account details and 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.

### **3 The lawful basis by which we process data**

We comply with our obligations under the UK 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.

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, where such photographs place the data subject as the focal point of the shot. 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 1st Crowmarsh Gifford 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 1st Crowmarsh Gifford 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 1st Crowmarsh Gifford Scout Group
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting

#### 4. Our data retention periods

##### *Young people*

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins, whichever is shorter	Required for placing individual on a waiting list for a place, or while waiting to formally join the Group
Joining	Personal and Sensitive data (special category)	10 Years after the young person leaves	Required for enquiries on membership and to respond to enquires from HQ or statutory agencies regarding incidents
Events	Personal and Sensitive data (special category)	2 years after event	Required for enquiries on the event and responding to incidents
Incident – No medical intervention	Personal and Sensitive data	7 years after incident, or 7 years after individual turns 18 if later	Legal claims raised against the incident
Training records	Personal data	2 Years after the young person leaves	Required for any re-joins to connect them back to their training records

Attendance register	Personal data	18 months	Required to complete annual registration review Required to prove attendance for Gift Aid reclamation
HQ Youth award registrations	Personal and Sensitive data (special category including citation)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period
HQ Youth award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion HQ will retain the data permanently for basic data; name, county, award, membership number, completion date	To retain their award registrations for the duration of the eligibility period Historic record of award completions

### *Adult volunteers*

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until adult volunteer joins	Required for considering suitability for a role, and if necessary for placing individual on a waiting list for a place
Joining	Personal and Sensitive data (special category)	2 Years after the adult volunteer leaves	Required for enquiries on membership
Adult Information Form	Personal and Sensitive data (special category)	12 months or until approval checks and "Getting started" training is complete, whichever is shortest	Required to assist in the appointment process
Identity Checking Form	Personal data	Until ID data has been submitted to DBS and the vetting process is complete	Required to verify that the identity has been checked.
Events	Personal and Sensitive data (special category)	2 years after event	Required for enquiries on the event and responding to incidents
Incident – No medical intervention	Personal and Sensitive data	7 years after incident, or 7 years after individual turns 18 if later	Legal claims raised against the incident
Training records	Personal data	2 Years after the person leaves	Required for any re-joins to connect them back to their training records
Appointments Advisory Committee notes	Personal data	18 months	Required to review any training needs of adult volunteers

Adult award registrations	Personal and Sensitive data (special category including citation)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period
Adult award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion HQ will retain the data permanently for basic data; name, county, award, membership number, completion date	To retain their award registrations for the duration of the eligibility period Historic record of award completions

### *Parents/Guardians*

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins	Required for placing individuals young person on a waiting list for a place or inviting them to join the Group
Joining	Personal data	2 Years after the young person leaves	Required for enquiries on membership
One off events	Personal data	2 years after event	Required for enquiries on the event and responding to incidents
Incident – No medical intervention	Personal data	7 years after incident, or 7 years after individual turns 18 if later	Legal claims raised against the incident

### *Donors*

Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	1 Year	To keep you informed of your donation
	Gift aid declaration	6 Years after donation	HMRC Tax Audit
	Direct debit mandate	6 Years after last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI

As a Subject Rights Request (SRR) can be made by any type of individual it is represented here. Data from an SRR will be retained for 7 years to allow for answers to queries and complaints raised in relation to the SRR.

#### **Notes:**

Where possible, personal and sensitive (special category) data should be anonymised as soon as appropriate if they are to be retained for analysis or statistical purposes.

The retention of safeguarding data is handled by The Scout Association as part of the safeguarding policies and no data should be retained locally. This should be in line with The Scout Association 'Young People First', 'Yellow Card'.

## **5. Joint control of membership data**

The Scout Association and 1st Crowmarsh Gifford Scout Group process the data of members, parents/guardians of youth members, volunteers on our membership databases. Volunteer data is processed between the local Scout Groups and The Scout Association. Information The Scout Association and 1st Crowmarsh Gifford Scout Group hold about volunteers may include the following:

- name and contact details
- length and periods of membership and volunteer service (and absence from membership and service)
- details of training you receive
- details of your experience, qualifications, occupation, skills and any awards you have received
- details of Scouting events and activities you have taken part in
- details of next of kin details (in the case of youth members)
- age/date of birth
- legal sex
- details of any health conditions
- details of disclosure checks
- any complaints we have received about the member
- details of any safeguarding concerns raised about or by the member
- details about your role(s) in Scouting
- details about your membership status
- diversity and inclusion data (including nationality, ethnicity, religion / belief, health information, gender, and sexual orientation)

## **Processing Activities**

The following is a list of common data processing activities for members, parents/guardians of youth members, volunteers data on the membership systems. This includes an indication of which entity carries out this activity which is shared with the other.

Processing Activity	Description	Processing entity
Scout Member capture	Initial data load of a new Scout Member onto the membership database	1st Crowmarsh Gifford Scout Group
Scout Member	Disclosure checks for any adult Scout	1st Crowmarsh Gifford Scout

disclosure check	Members that require them	Group initiate  The Scout Association complete the check
Scout Member operational administration	This may include:  Scout Member data updates  Maintaining training record  Events attended  Permits approved  Badges awarded	1st Crowmarsh Gifford Scout Group and The Scout Association
Scout Member disciplinary	Scout Member disciplinary detail capturing where a Scout Member has breached POR or any other Scout policy	1st Crowmarsh Gifford Scout Group initiate  The Scout Association involved if severity meets a policy threshold
Scout Member leaving	The updating of an individual's membership status post leaving the association.	1st Crowmarsh Gifford Scout Group
Scout Member data reporting	Reporting on trends and monitoring data to be able to demonstrate The Scouts impact and to attract funding (this may include optional special category data of the Scout Members)	The Scout Association  1st Crowmarsh Gifford Scout Group may access special category data for Census and local Scouting delivery
Scout Member Training	The addition of mandatory training for Scout Members, where applicable	The Scout Association
Scout Member roles definition	The definition of Scout Member roles on the membership databases	The Scout Association

## 6. Sharing your information

### Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment in the 1st Crowmarsh Gifford Scout Group.

### 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 Crowmarsh Gifford Scout Group as well as with The Scout Association Headquarters as independent data controllers.

#### **All data subjects**

We will however share your personal information with others outside of 1st Crowmarsh Gifford 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) such nominations may require us to provide contact details and award nomination details, such as citations to that organisation. We may also share data on award nominees for National Honours Awards, including the same data as above.

**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.**

#### **7. How we store your personal data**

We generally store personal information in the following ways:

The Scout Association Online Membership System - this 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.

WhatsApp – used to store contact information and images in accordance with 1st Crowmarsh Gifford Scout Group Social Media Policy.

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

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.

## **8. 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.

## **9. How we provide this privacy notice**

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.

## **10. Your rights**

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](http://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 online 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.

## **11. Website cookies**

When you use our website, we place a small text file called a 'cookie' (made up of letters and numbers) on your computer, tablet or mobile phone's storage device. Using cookies is a really common practice and helps us to give you the best experience possible on our websites. Cookies are completely harmless and can't be used to run programs or deliver viruses to your computer.

The cookies we use can be found at [Cookies | 1st Crowmarsh Gifford Scout Group](#)

## **12. Who to contact?**

If you have any queries relating to this Privacy Notice or our use of your personal data, please speak to your Section Team Leader who will be happy to discuss matters, or contact us via the contact page on our website at [Contact | 1st Crowmarsh Gifford Scout Group](#) .