

# Scouts Bromyard – Data Protection Policy

Last review date: 23 Sept 2022

Next review date: 23 Sept 2023

Scouts Bromyard collects, stores, protects, uses and retains personal information securely, for the simple purpose of operating Scouting, and destroys it after reasonable use. We will not pass personal information to other organisations or non-member individuals without the owner's consent.

## Data Privacy Notice

Scouts Bromyard's commitment to protecting privacy and data forms a key policy for Scouting. This policy underpins both this Data Protection Policy and other associated policies used by The Scout Association, local Scouting and its membership.

### What is this privacy notice/policy?

This Data Privacy Notice/Policy describes the categories of personal data Scout Bromyard process and for what purposes. Scouts Bromyard is 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 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 Scouts Bromyard.

### Who we are

Scout Bromyard are a charity based in Bromyard, England.

The Data Controller for Scout Bromyard are the Trustees who are appointed at an Annual General Meeting.

From this point on Scout Bromyard will be referred to as "we".

Being a small charity, we are not required to appoint a Data Protection Officer

### The data we may process

The majority of the personal information we hold is provided to us directly by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership system. 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.
- Bank account details so that we are able to reimburse any persons as required and 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.

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

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.

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
- 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 of news, events, activities and services being run or attended
- to ensure and evidence your suitability of volunteering for a role in Scouting
- to contact next of kin in the event of an emergency
- to ensure and maintain the correct qualification levels and skills.

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

- for the protection of a person's health and safety whilst in our care
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting.

## **Our retention periods**

We will keep certain types of information for different periods of time in line with our retention policy available on our website (<http://ScoutsBromyard.com>)

The Scout Association's Data Protection Policy can be found [here](#) and the Data Privacy Notice [here](#).

## **Sharing your information**

Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment.

Adult volunteers

We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association, as well as with The Scout Association Headquarters as data controllers in common.

### **All data subjects**

We will share personal information where we need 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 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 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

## How we store your personal data

We store personal information in the following ways:

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

**Online Youth Manager Ltd (Online Scout Manager)** - used to record the personal information, badge records, event and attendance records etc. We have a data processing agreement in place with online youth manager, more information is available at <https://www.onlinescoutmanager.co.uk/security.php>

**GoCardless** - GoCardless enable payments to our group through Online Scout Manager. Payments are handled by GoCardless, who are regulated by the Financial Conduct Authority. We do not have direct access to bank account details.

**Stripe** – Stripe enable payments to our group through Online Scout Manager. Payments are handled by Stripe, who are regulated by the Financial Conduct Authority. We do not have direct access to bank account details.

**Microsoft** - used for email and document storage.

**Tsohost** (website host) - limited personal data is shared to enable the creation of user accounts, contact forms may also contain limited personal data and these are held securely on the site until transferred to OSM or Compass. <https://www.tsohost.com/legal/privacy-policy>

In addition, adult volunteers will 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/ session registration
- Health and contact records forms (for events)
- Events coordination with event organisers
- Events consent from parent, guardian or carer
- Health and contact records update forms.
- Award notifications/nominations

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 minimise the use of paper to only what is required for the event.

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.

## Who to contact

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact the Scouts Bromyard Group Scout Leader on [gsl@ScoutsBromyard.com](mailto:gsl@ScoutsBromyard.com)

## Data Retention

### Young people

Data Process	Data Type	Retention	Justification
<b>Joining</b>	Personal and Sensitive data (special category)	Retained while individual remains on waiting list or 5 years, whichever is shorter	Required for placing individual on a waiting list for a place and enquiries on membership
<b>Ongoing membership</b>	Personal and Sensitive data (special category)	Up to 18 months after the young person leaves	Required for safety, safeguarding and running of Scout sessions
<b>Events</b>	Personal and Sensitive data (special category)	Up to 18 months after event	Required for enquiries on the event, responding to incidents and maintaining scout record history
<b>Safeguarding</b>	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
<b>Incident – No medical intervention</b>	Personal and Sensitive data	Data will be reported to the Scouts Information Centre and retained until the young person is 21 or 3 years, whichever is greater	Legal claims raised against the incident
<b>Badge requirement records</b>	Personal data	Up to 18 months after the young person leaves	Required for any re-joins to connect them back to their record history
<b>Attendance register</b>	Personal data	Up to 18 months	Required to complete annual registration review Required to prove attendance for Gift Aid reclamation

**Adult volunteers**

<b>Data Process</b>	<b>Data Type</b>	<b>Retention</b>	<b>Justification</b>
<b>Joining</b>	Personal and Sensitive data (special category)	Up to 18 months after the adult volunteer joins	Required for enquiries on membership
<b>Ongoing Membership</b>	Personal and Sensitive data (special category)	Up to 18 months after the adult volunteer leaves	Required for safety, safeguarding and running of Scout sessions
<b>Adult Information Form</b>	Personal and Sensitive data (special category)	Up to 18 months after approval checks and “Getting started” training is complete	Required to assist in the appointment process
<b>Identity Checking Form</b>	Personal data	Up to 1 months after ID data has been submitted to DBS/PVG and the vetting process is complete	Required to verify that the identity has been checked.
<b>Events</b>	Personal and Sensitive data (special category)	Up to 18 months after event	Required for enquiries on the event and responding to incidents
<b>Safeguarding</b>	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
<b>Incident – No medical intervention</b>	Personal and Sensitive data	Data will be reported to the Scouts Information Centre and retained until the young person is 21 or 3 years, whichever is greater	Legal claims raised against the incident
<b>Training records</b>	Personal data	Up to 18 months after the adult volunteer leaves	Required for any re-joins to connect them back to their training records
<b>Appointments Advisory Committee notes</b>	Personal data	Up to 18 months	Required to review any training needs of adult volunteers

<b>Expenses payment information</b>	Personal data	6 years from the end of the tax year to which they relate	Taxes Management Act 1970
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## Parents

<b>Data Process</b>	<b>Data Type</b>	<b>Retention</b>	<b>Justification</b>
<b>Joining</b>	Personal data	Retained while individual remains on waiting list or 5 years, whichever is shorter	Required for placing individual on a waiting list for a place and enquiries on membership
<b>Ongoing Membership</b>	Personal data	Up to 18 months after the member leaves	Required for safety, safeguarding and running of Scout sessions
<b>One off events</b>	Personal data	Up to 18 months after event	Required for enquiries on the event and responding to incidents
<b>Safeguarding</b>	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
<b>Incident – No medical intervention</b>	Personal data	Data will be reported to the Scouts Information Centre and retained until the young person is 21 or 3 years, whichever is greater	Legal claims raised against the incident

## Donors

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

## Notes:

Where possible, personal and sensitive (special category) data will be anonymised as soon as appropriate after members leave the group.

Where possible, data is deleted when not required any further, even if this falls inside stated retention periods.

The retention of safeguarding data is handled by the Scouts UK Headquarters as part of the safeguarding procedures and no data should be retained locally. The Scout Association's retention policy can be found here: <https://www.scouts.org.uk/about-us/policy/>