

2nd Portishead Scout Group has a strict Privacy and Fair Processing Notice which describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the Data Protection Act 2018 (including General Data Protection Regulations (GDPR)).

This Data Processing Policy details how we as Leaders and as an organisation process the data we hold for our members, fellow leaders and adult helpers.

WHAT IS PERSONAL DATA

Personal Data is anything that can be used to identify a “natural person” (someone who is alive) the “Subject” and therefore includes information such as “telephone, email, IP address, first name & surname and address information”. Retaining this personal data, we have to ensure that this information is protected from accidental release. Further “more restricted” information includes Medical Information which we hold for our members.

DATA CONTROLLER

Our Group Executive Committee is the “Data Controller” for the information we collect. In some circumstances (e.g. *Adult Data and, where required, shared data*) “The Scouts” both district, county and UK may also be a joint “Data Controller”.

The Data Controller, for us is our Executive Committee and therefore the choice regarding the data we hold, and process lies solely with them and us. As leaders (Data Processors), we should follow the guidelines set down (here) by the Data Controller.

As leaders and Adult Helpers and thus Data Processors, we cannot determine what data we collect or decide to add or collect additional data not set down by the Controller.

DATA COLLECTION RULE

Any personal data that we collect will only be in relation to the work we do with our members and through our relationship with supporters, donors and funders.

The majority of the personal information we hold, is provided to us directly by our subjects, our adult leaders or helpers or by parents / legal guardians in either paper form or via our online membership systems, in the case of an adult member, data may also be provided by third party reference agencies, such as the Disclosure and Barring Service (DBS).

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

WHY WE PROCESS DATA

We process the data to have the ability to contact our members (children, adult leaders, adult helpers), parents and guardians, (and where required, emergency contacts) to inform them of meetings, events that the group itself may be running or attending and to ensure the safety and safeguarding of the members within the 2nd Portishead Scout Group.

We may use personal data for the following purposes: -

- Contact information (First name, Surname, Address, Telephone, Email) so that we are able to maintain contact with you, the member (if adult) or members carers.
- Medical information for the protection and safeguarding of the member whilst in the care of the Scout Group.
- Contact information (First name, Surname, Address, Telephone, Email) for the parents/guardians/next of kin to ensure we are able to maintain contact with the members carers and for our adults, we are able to contact someone else in the event there is a need to do so.
- Dietary information to ensure we understand any restrictions the member may have with different foods, whether allergies, religious grounds or specific dislikes so any activities including food will be safe for the member.
- To enable us 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 the Scout Group
- 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 running at The 2nd Portishead Scout Group.

WHAT IS OUR LEGAL BASIS FOR PROCESSING INFORMATION?

We may only use the personal information we hold where permitted by the laws that protect privacy rights. We only use personal information where:

- a) We need to use the information to comply with our legal obligations
- b) We need to use the information to contact the subject regarding meetings, events, collection of membership fee's etc, (i.e. for the day to day running of the group)
- c) It is fair to use the personal information in the subjects interests, where there is no disadvantage to the subject – this can include where it is in our interests to contact the subject about products or services within scouting.
- d) The processing is necessary for the person's legitimate interests or the legitimate interests of our Scout Group unless there is a good reason to protect the individual's personal data, which overrides those legitimate interests.

STORAGE OF PERSONAL DATA

We only permit the storage of “Personal Information” in one of two secure digital online database systems, where access to that data is restricted and controlled. Our leaders are aware of these systems and the requirement NOT to store personal information outside of these systems.

- **Compass:** - is the online membership system of The Scouts, this system is used for the collection and storage of Adult personal data, training records and permit information. Compass also links and shares information with the DBS system, Atlantic.
- **Online Scout Manager** is an online membership system run by Online Youth Manager Ltd, this is a secure membership database where we store the personal information of Adults and Youth members for the day to day running of the group.

Email Systems are NOT secure and we do not permit the transmission of any personal data (for example InTouch contact sheets) unless protected by further encryption and passwords where passwords are NOT emailed to the individual receiving the data and the password is sent via another method, such as SMS.

Short term “printed” use / storage of personal data is authorised only where electronic systems (Compass and Online Scout Manager) do not provide the necessary method of capture or where the safety of the members requires the use of paper based data.

- **Printed records and Event data**
Paper is sometimes used within the sections to capture and retain some data for example the following: -
 - New joiners form.
 - Gift Aid Collection forms.
 - Events consent from parents.
 - Events coordination with event organisers.
 - Award notifications/nominations

This information is securely held by the leader and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

- **Gift Aid** collection forms/data, will be securely held by the Groups Treasurer to aid in the collection of Gift Aid, we have a legal obligation to retain this information for 7 years after our last claim.

Personal Data is NOT stored on personal computers or smart phones / tablet's.

EVENTS

During camps and other activities, where is necessary to fulfil our legal obligations, we may require a less secure means to access personal information, such as printouts of personal contacts and medical information, (including specific event contact forms) - rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available or the risk of continued electronic device use with failed batteries is high. We will minimise the use of paper to only what is required for the event/camp.

We will ensure:

- a) Transfer of paper is secure, such as physical hand to hand transfer or registered post.
- b) Paper forms are securely destroyed after use.
 - a. Secure destruction should be through a shredding machine, securely burned or through pre-agreed destruction services at our leaders places of work
- c) Always keeping the paper records secure, especially when in transit, by using:
 - i. Keeping with a leader at all times
 - ii. Never leaving in an unattended vehicle
- d) If transferred to somebody, you should audit that they return them when the event is complete. (person providing the printed documents should collect them all back at the end of the event)

PRE AGREED SHREDDING SOLUTIONS

Where our leaders have access, through their employment, to a secure shredding / confidential waste disposal solution this may be used for the disposal of any printed material otherwise our leaders will ensure that any paper based information is securely disposed of after it is no longer required.

AWARDS

Sometimes you may nominate a member for national award, (such as Queens Scout or Duke of Edinburgh award), such nominations may require you to provide contact details to the awarding organisation, this is most often done on paper via registered post; any personal information emailed (where this is the only option) should be protected by encryption and a password with a preference being entering data via a secure web portal.

SOCIAL MEDIA

You can utilise social media

- **Facebook** – We will post photographs of our activities on our “Open” Facebook page which is accessible to anyone who searches for the 2nd Portishead Scout Facebook Page. We will not name children in these posts. Members photos will only be posted if they have signed the consent form for photo’s in Online Scout Manager / My.Scout.

We may also post to our “Closed” Facebook groups where we provide access only to those authorised and therefore we may use the members first name in a post but no further identifiable data. Our closed facebook pages are designed for parents so content isn’t in our control.

- **Twitter** – We may also post or “tweet” on Twitter, either directly or through links into Facebook and information from our main scout page may also appear on twitter. We will never post or tweet any name details.

SHARING AND TRANSFERING INFORMATION

We will normally only share personal information with our Scout Group leaders and executive members. Before determining the method of sharing, we will consider what information (less being optimal) is required to be shared and then consider the safest method of sharing available. Our leaders will also ensure that any information is shared securely.

Methods of sharing include:

- Via Online Scout Manager
- Via Compass
- Email ONLY IF ENCRYPTED WITH A PASSWORD
- Registered Post
- Online Secure Portals (ensure SSL encryption, https)

We may also share personal information with others outside our Scout Group where we need meet or enforce a legal obligation; this may include, Gordano District, Avon County, The Scouts and the insurance subsidiary "Unity", local authority services and law enforcement, we will only share personal information to the extent needed for those purposes.

When a member moves from 2nd Portishead Scout Group to another Scout Group or Explorer Scout Unit we will transfer their personal information to them.

We will never sell or transfer any personal information to any third party for the purposes of marketing or for any other reason outside of scouting as this will be a serious breach of our Privacy Policy and the DPA2018.

It may sometimes be necessary to share personal data with other organisations where the other organisation is providing a service and/or event for our members and requires, for the safeguarding of those attending, some personal data – this information will be shared only to the extent required and will be transmitted securely.

All personal data we have access to will be treated as strictly confidential. We will only share personal data with third parties outside of the organisation where there is a legitimate reason to do so. For any external data sharing we will take steps to anonymise the data we hold (*i.e. collective reporting on gender, ethnicity, age, etc.*).

TRANSFERS OUTSIDE OF THE UK & EU

We will not transfer any personal information outside of the UK or EU, with the exception where an Event is taking place outside of the UK/EU and it is necessary to provide personal information to comply with our legal obligations, although generally such an event will have its own data collection form which will be securely held and disposed of after the event.

RETENTION POLICY

We retain personal data, throughout the time a member is a member of 2nd Portishead Scout Group.

We retain full personal information for a period of one year after leaving 2nd Portishead Scout Group and in a much more limited form (just name, badge and attendance records) for a period of up to 15 years (or until the age 21) to fulfil our legal obligations for insurance and legal claims.

We will also keep any Gift Aid Claim information for the statutory 7 years as required by HMRC (which may be beyond age 21)

The Scouts will maintain (in an archived form) Adult leader information for an indefinite period for safeguarding reasons.

RIGHTS OF THE SUBJECT

Data Subjects have a number of rights (as detailed within our Privacy Policy)

SUBJECT ACCESS REQUEST PROCEDURE

Should we receive a "Subject Access Request (SAR)" the leader receiving the SAR will advise the GSL immediately to ensure we have the appropriate amount of time to process the SAR within the statutory period. We will redact all data to ensure no other personal details are provided to the data subject requesting the disclosure.

RIGHT TO RECTIFICATION PROCEDURE

If an error is identified in the information we have on record, normally the subject (or their carer) are able to amend the data directly within OSM, however, should they note an error and request we amend, we will do so and advise the GSL that an error amendment request was received and completed.

If a leader is unable to effect the change the GSL will be advised.

RIGHT TO ERASURE / RIGHT TO BE FORGOTTEN PROCEDURE

We have legal requirements to retain certain data for periods of time and therefore a complete erasure will in most cases not be possible – any request received will be reviewed by the GSL and/or with Avon District to determine what is and is not possible.

RIGHT TO RESTRICT PROCESSING PROCEDURE

If a subject (member, parent/carer) believes there's something wrong with the data being held or they aren't sure if we are complying to rules, they can restrict any further use of their data until the problem is resolved.

Requests should be submitted to the GSL, however, if a leader receives a request, they will cease processing and advise the GSL.

RIGHT TO DATA PORTABILITY PROCEDURE

Subjects have the right to request a copy of their data in an electronic readable form – this if requested will be provided by the GSL and leaders will refer any direct request to the GSL.

RIGHT TO OBJECT PROCEDURE

A subject (member or parent/carer) can object to the ways their data is being used. All requests will be passed to the GSL.

FURTHER PROCESSING NOTE

If we wish to use any personal data we hold for a new purpose, not covered by this our policy, we will provide the subjects 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 the subjects (or Parent/Carers) prior consent to the new processing.

INFORMATION / ASSISTANCE REQUESTS

For any queries, complaints or requests, please in the first instance contact our Group Scout Leader gsl@2ndportishead.org.uk.

Reviewed: 18th April 2019