

## **1<sup>st</sup>. Fordingbridge Scout Group including Viper Explorer Unit Data Protection, Confidentiality and Privacy Policy**

### **Who is this for and what does it apply to?**

The current Data Protection (DP) regulations are being updated in May 2018 to be consistent with European legislation known as the General Data Protection Regulation (GDPR). Data Protection regulation applies to all organisations that hold any information that identifies living people.

DP rules do not apply to organisations holding only organisation data, with no names attached and the rules do not apply to individuals holding address books or, for example, Christmas Card lists on computer.

In Scouts, Data Protection applies to the lists of young people, adults and any other people recorded in a structured way for their future contact. It applies to the use of the Compass membership system from recruitment onwards and Online Scout Manager (OSM). It applies to information gathered from the website, to activity information forms and fundraising list information. It does not apply to incidental naming of people in, for example, minutes of meetings or action lists.

### **Commitment**

1<sup>st</sup>. Fordingbridge Scout Group is committed to fully complying with the DP rules. This means that every person (Leaders, Administrators, honorary officers and Executive Members) involved in 1<sup>st</sup>. Fordingbridge Scout Group will observe this Policy.

### **Formal Contact**

1<sup>st</sup>. Fordingbridge Scout Group is the Data Controller. The contact address is The Chairman, 1<sup>st</sup>. Fordingbridge Scout Group, Roundhill, Fordingbridge, SP6 1AQ

1<sup>st</sup>. Fordingbridge Scout Group processes personal data using paper and electronic systems. It works with partner data processors including The Scout Association and Online Scout Manager.

1<sup>st</sup>. Fordingbridge Scout Group has determined that the partner organisation data processing on its behalf is compliant with GDPR as far as it can assess.

### **The Legal Basis of our Data Processing**

1<sup>st</sup>. Fordingbridge Scout Group is an unincorporated educational children's charity. The young people it serves are Members. Adults in Leader, Trustee and Supporter Roles are either Members, Associate Members or Non-members. The 1<sup>st</sup>. Fordingbridge Scout Group also processes data of helpers and benefactors.

To achieve the purposes of the charity we process data *for our legitimate interests*

This includes processing for the purposes of

- 1. Administration of the Scouting Programme and Activities

- 2. Governance
- 3. Safety and safeguarding
- 4. Fundraising and Public /Community Relations

This includes processing by holding paper and electronic records, processing with the facilities or our data processing partners and sending communications by paper and electronic means.

We process data *for legal reasons*

This includes for the purposes of -

- 1. Maintaining Safety and Safeguarding records in compliance with the Scout Association's Policy Organisation and Rules (POR)
- 2. Maintaining accounting records as required by HMRC and charity regulation
- 3. We process data by reason of *data subjects' consent*

This includes for the purposes of -

- 1. Statistical reporting about inclusion relating ethnicity and disability
- 2. Fundraising by direct mail or electronic communications

### **Special Categories of Personal Data**

1. Data will be processed about Members' and Adult Helpers' Ethnicity, Health, Disability and Religious Belief to enable inclusion. Information about criminal records will be processed to inform recruitment decisions but will not be kept. (Disclosure of all criminal convictions and cautions and the provision of an enhanced certificate from the Disclosure and Barring Service (DBS) is required for all adults in relevant roles, this being in compliance with the relevant legislation about filtering and rehabilitation of offenders)
2. The personal data of members and adult helpers we process will include full name and contact details, date of birth and age, records of service and training. Records of service will include roles and activities undertaken and role reviews. Relevant records will be kept for the management of Safety, Safeguarding and Personnel.
3. Website information will be kept for the effective management of the website and statistical purposes.
4. Financial information about bank accounts, payment of membership and activity fees, donations the processing of gift aid and the maintenance of records as required by regulations.

## **Sharing of your Personal Data**

Subject to Data Protection regulations the 1<sup>st</sup>. Fordingbridge Scout Group will share your data as relevant with The Scout Association, the local Scout District and Scout County and other Scout Groups to enable to provision of Scout programme and activities, training opportunities, administration and promotion.

1. It would be shared to comply with legal requirements when necessary or others when we have your consent.
2. It would be shared with medical services to protect your vital interests
3. It would be shared when relevant for the good administration of the charity and security of our processes.
4. It will be processed by partner data processors including cloud-based services for the good administration of the 1<sup>st</sup> Fordingbridge Scout Group and achievement of its charitable purposes.
5. Personal data may be transferred outside the UK ad European Economic Area (EEA) through the use of cloud computing systems.

## **Confidentiality**

1<sup>st</sup>. Fordingbridge Scout Group is an organisation with approximately 18 Leaders with various levels of access to groups of Young Persons and Adults information. All persons with access to personal data are required to maintain that personal data in confidence and not to share it outside a “need to know” basis. All persons with access to personal data are required to agree to a Confidentiality and Data Protection statement. Anyone accessing personal information is required to only use devices that are secure by being in their own homes or scouting offices else be protected by password and encrypted, and with system security and data back-up.

## **Safeguarding Partnership**

The 1<sup>st</sup>. Fordingbridge Scout Group is a member of The Scout Association and complies with its Policy, Organisation and Rules (POR). POR includes the safeguarding processes involving recruitment and safeguarding investigations. Personal information will be passed to the Scout Association for their processes in safer recruitment and safeguarding. Information will be passed to the Police when there is a relevant concern.

## **Subject Access**

Any person who is the subject of personal data held by the Group may make a subject access request by contacting the Chairman. The request will be processed in accordance with current regulation.

Adults may access their personal data by logging into Compass. Adults are encouraged to keep this up-to-date themselves.

Parents and Young People can log into Online Scout Manager (OSM) to access and edit their OSM data.

## **Not registered with ICO**

As a charity, the 1<sup>st</sup>. Fordingbridge Scout Group, handles personal data only for the purposes of maintenance of its Membership and Donors and is not required to notify the Information Commissioners Office (ICO) or to pay the Data Protection fee.

## **Your Rights under Data Protection Regulation**

Your rights are as follows -

- 1. To be informed** about how we process your personal data: this Data Protection and Privacy Policy seeks to provide that information
- 2. To have any erroneous personal data corrected:** the 1<sup>st</sup>. Fordingbridge Scout Group requests all Members to notify any changes and will update information without delay.
- 3. To object to processing:** the 1<sup>st</sup>. Fordingbridge Scout Group will comply with your request as far as possible, some records are maintained for the formal administration of the charity, for safety and for safeguarding purposes when retention of records will be required.
- 4. To restrict processing:** the 1<sup>st</sup>. Fordingbridge Scout Group will comply with your request as far as possible,
- 5. To have your personal data erased:** the 1<sup>st</sup>. Fordingbridge Scout Group will comply with your request as far as possible.
- 6. To request access:** the 1<sup>st</sup>. Fordingbridge Scout Group will comply with current regulations
- 7. To move, copy or transfer** your personal data: the 1<sup>st</sup>. Fordingbridge Scout Group will comply with your request as far as possible acknowledging that adult member records are included in Compass. The transfer of young person's data in OSM may be possible.

## **Questions about Data Protection or the use of Personal Data**

Any questions or comments about data protection or this policy, notwithstanding your rights above, should be addressed to The Chairman, 1<sup>st</sup>. Fordingbridge Scout Group (or Data Protection officer) at 1<sup>st</sup>. Fordingbridge Scout Group, Roundhill, Fordingbridge, Hants., SP6 1AQ

## **Adult Members Personal records**

The personal Membership profile of each member is kept on Compass, the Scout Associations adult data base. It is the responsibility of each member to ensure that they keep their own record up to date. If anyone has difficulty in accessing their membership record then they should ask their line manager for assistance. The Scout Association Information Centre (0345 300 1818) may also be able to help.

## **Internal and Other Directories**

The compilation of any directory must have the approval of the executive committee. Directories must only contain the information that is specifically consented to include. The request for consent must include information about access to or distribution of the directory. The directory must be kept-up to date by a named person.

### **Programme, Activity and Training Registration**

Personnel will use appropriate and secure methods to gather information for registration. Only information that is necessary for the purpose will be requested.

Information may be gathered by paper or online forms. A data protection statement will be included in the form stating the whole use of the data and specifically identifying any sharing or not.

Activity registration data will often form part of relevant training and safeguarding information and so will be kept for the relevant time scale.

### **Retention of records**

Records will be retained for the good administration of the 1<sup>st</sup>. Fordingbridge Scout Group.

- 1. For governance matters - indefinitely
- 2. Attendance records for safeguarding purposes – indefinitely
- 3. Adult Membership, involvement and training records will be kept on Compass and not in other forms of record, therefore kept in compliance with the persons Membership and Scout Association policy.
- 4. Notes and records from Safeguarding investigations will be sent to the Scout Association for retention and not kept locally
- 5. For accounting purposes for 6 years after the end of the relevant year

### **Consent for children**

Consent for children (under 18's) to participate in activities and to receive communications will require parental / guardian consent.

### **Consent to electronic mailings - unsubscribe**

Mailings will be sent for notification of events, administration and governance. Anyone who wishes not to receive such mailings, providing it is not a duty, will be unsubscribed. All mailings will have an Unsubscribe facility.

### **Communication of this Policy**

This policy is placed on the website and is available from the 1<sup>st</sup>. Fordingbridge Scout Group Headquarters.

## **Review of this Policy**

This Policy will be reviewed periodically as any changes in regulations or best practice occur; this will be at least every 3 years.

## **Agreed**

This Policy was agreed by the 1<sup>st</sup> Fordingbridge Scout Group Executive on 4<sup>th</sup>. July 2018

Signed: Martin Smethers.....Chairman      Date: 4<sup>th</sup>. July 2018