

Data Privacy Notice

1st Grasby Scout Group

Our Data Privacy Notice 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 General Data Protection Regulations (GDPR).

1 Who are we?

Our Scout Group, 1st Grasby, is a youth charity. Our mission is to actively engage and support young people in their personal development, empowering them to make a positive contribution to society. We are incorporated by royal charter and are regulated as a member of the UK The Scout Association, (see www.scouts.org.uk for more information).

In the spring of each year, we hold an Annual General Meeting where members of the charity executive committee (our trustees), are elected; any parent/guardian of a young person attending 1st Grasby Scout Group can decide to stand for election on the executive at the AGM. Every parent/guardian is a member of the Scout Group Council has and therefore has the right to attend and vote at the Annual General Meeting.

The 1st Grasby Scout Group is based at the Grasby Village Hall, Station Road, Grasby, Lincolnshire, DN38 6AP.

The Group Executive Committee Secretary is the data controller for the information we collect from you. Any personal data that is collected will only be in relation to the work we do with our members and through our relationship with supporters, donors and funders.

2 Personal data – what is it?

Personal data relates to a living individual (data subject) who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in our Scout Group's (the data controller's) possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

3 How we gather personal information

Most of the personal information we hold, is provided to us directly by adult leaders/helpers and from a Young Persons' parent/guardian 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).

When a member is under 18 years of age, they are defined as a Young Person (YP); YP information will only be obtained from a parent/guardian and cannot be provided by the young person.

4 How do we process personal data?

We comply with our obligations under the GDPR 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 measures are in place to protect personal data.

We process the data so that we can contact the member, parents or guardians, to inform them of meetings or events that the group may be running or attending.

We typically use personal data in the following ways:

- Personal and medical information for the protection of that person whilst in the care of the Scout Group.
- Religious data should data subjects choose to share it so that we may respect a person's beliefs with regards to activities, food and holidays etc
- 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 1st Grasby Scout Group.

5 What is the legal basis for processing your/your child(ren)'s personal data?

We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information:

- To comply with our legal obligations.
- To contact data subjects, regarding meetings, events, collection of membership fee's etc, (i.e. for the day to day running of the group).
- For parental interests, where there is no disadvantage to parents/guardians.
- For the persons' 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.

6 How we store personal data

We are committed to the protection of your personal information.

We generally store personal information in one of two secure digital online database systems, where access to that data is restricted and controlled:

Compass: This is the online membership system of The Scout Association. This system is used for the collection and storage of only adult leader/helper personal data.

Online Scout Manager: This is an online membership system run by Online Youth Manager Ltd. It 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.

Printed records and Event data

Whilst we are striving to move to a completely digital data service, paper is still occasionally used within the sections to capture and retain some data for example the following:

- New joiners form.
- New joiners waiting lists.
- Health and contact records update forms.
- Gift Aid Collection forms.
- Events consent from parents.
- Events coordination with event organisers.
- Award notifications/nominations.
- Permission Forms (i.e. Air Rifle Shooting and Archery).

In the case of these forms, the information is securely held by the leader or manager and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

Gift Aid: Again, Online Scout Manager is our preferred method of gaining Gift Aid approval. However, Gift Aid forms can still be used and will be securely held by the Group Scout Leader (GSL) to aid in the collection of Gift Aid for termly membership fees; we have a legal obligation to retain this information for 6 years after our last claim.

Events: As a member of 1st Grasby Scout Group it is hoped all YP will take up the opportunity to attend events and camps. Where it is necessary to fulfil our legal obligations, we will be required to potentially have 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. We will minimise the use of paper to only what is required for the event/camp.

We will ensure:

- Transfer of paper records is secure, such as physical hand to hand transfer.
- Paper forms are securely destroyed after use.
 - Secure destruction will be through a shredding machine or securely burned.
- To always keep the paper records secure, especially when in transit.
- If transferred to somebody else, we will audit that they return them when the event is complete.

Awards: Sometimes we may nominate a member for an award, such as Queens Scout or Duke of Edinburgh award. Such nominations would require we provide contact details to the awarding organisation; this is most often done digitally but can also be done on paper forms.

7 Sharing and transferring personal Information

We will only normally share personal information between our Scout Group leaders and Executive members. All Leaders and Executive members will have completed GDPR training before having access to data.

We will, from time to time, share data subjects' personal information with others outside our Scout Group where we need to meet or enforce a legal obligation; this may include, Louth Scout District, Lincolnshire County Scouts, The Scout Association and its insurance subsidiary "Unity", local authority services and law enforcement. We will only share personal information to the extent needed for the purpose and this includes safeguarding protection. We have given consent to The Scout Association to have direct and immediate access to our data if it is required for an immediate safeguarding situation.

If a data subject moves from the 1st Grasby Scout Group to another Scout Group or Explorer Scout Unit we will transfer the personal information digitally using Online Scout Manager. If that is not possible, the parent/guardian will be presented with a complete copy of the personal and badge records for the YP which they may take to the new Group.

We will never sell your personal information.

All personal data will be treated as strictly confidential. We will only share data with third parties outside of the organisation where there is a legitimate reason to do so. We will take steps to anonymise the data we provide (i.e. collective reporting on gender, ethnicity, age, etc.). If identifiable data is to be shared, we will seek your consent.

Third Party Data Processors: 1st Grasby Scout Group employs the services of the following third-party data processors: -

- The Scout Association via its adult membership system, Compass, which is used to record the personal information of leaders, adults and parents who have undergone a Disclosure and Barring Service (DBS) check.
- Online Youth Manager Ltd (Online Scout Manager) which is 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>
- Dropbox is very occasionally used for secure transfer of limited personal information for events.
- Google is very occasionally used for secure transfer of limited personal information for events.
- Facebook: We have a closed Facebook Group for 1st Grasby Scout Group. It is not obligatory. Parents/guardians have control of the items shared. (We only publish photographs for members where we have permission to do so; we also ask that members are not tagged or named in comments).

Automated decision making: 1st Grasby Scout Group does not have any automated decision-making systems.

Transfers outside the UK: 1st Grasby Scout Group will not transfer your personal information outside of the UK, with the exception of when an event is taking place abroad and it is necessary to provide personal information to comply with our legal obligations. Generally, such an event will have its own data collection form which will be securely held and disposed of after the event.

8 How do we protect personal data?

We take appropriate and necessary measures to ensure that the information shared with us is kept securely. We do this through initial adult training and by securely keeping the data in as few locations as possible, primarily in digital format (OSM).

Everybody involved in the Scout Group must attend and pass a Scout Association GDPR course before they are permitted access to any personal data. The training teaches how to handle personal and sensitive data and the regulations regarding what can and cannot be done with it.

We use OSM extensively as our primary data storage facility. OSM is protected by a password-protected sign-in protocol and only adults having completed GDPR training with a need-to-know are permitted to own and use an OSM sign-in. Occasionally, we have to produce paper copies of participants details for outdoor activities where OSM is not accessible. These documents will be securely destroyed after the activity either by burning or shredding.

Any other paper copies containing personal data, such as accident reports etc., will be kept under lock and key by the nominated guardian (usually the GSL). These documents too, will be securely destroyed by either burning or shredding after the requisite time-period, see chapter 9.

9 How long do we keep your personal data?

We will retain your personal information, throughout the time you/your child(ren) are a member of 1st Grasby Scout Group.

On leaving the Group we will send the parents/carers a full copy of the records held. This includes all personal information and badge records and will either be a paper copy or an electronic copy via email. We will then remove all personal information but keep the name and core contact details for 3 full terms after leaving. Thereafter, we will remove all details including the name and member's history.

Any first aid reports registered in our accident books will be kept for 3 years from the date of incident.

Details of incident reports which have been referred to the Scout Association due to higher-level medical treatment will be kept until the young person is 21 years of age, or, in the event of an adult being the subject, for 3 years from the date of incident.

We are obliged to keep any Gift Aid Claim information for 6 years as required by HMRC.

10 Your rights and your personal data

Any data subject has the right to object to how we process their personal information. They also have the right to access, correct, delete and restrict the personal information we use. In addition, they have a right to complain to us and to the data protection regulator.

Unless subject to an exemption under the GDPR, data subjects have the following rights with respect to their personal data: -

- **The right to be informed** – a right to know how data will be used by our Scout Group.
- **The right to access personal data** – a right to ask 1st Grasby Scout Group to share the data they have about themselves.
- **The right to rectification** – this just means a data subject can update personal data if it is inaccurate or if something is missing. Anybody can view and edit their own personal information directly on our online membership systems Online Scout Manager (Young Person) and Compass (Adult Member).
- **The right to erasure** – a data subject has the right to request that we delete any personal data held about them. There are some exceptions, for example, some information can be held for legal reasons. This may, however, restrict a young person's attendance at activities.
- **The right to restrict processing** – if a data subject thinks there is something wrong with the data being held about them, or they are not sure if we are complying to rules, then they can restrict any further use of their data until the problem is resolved.
- **The right to data portability** – this means that if any data subject asks, we will have to share their data with them 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** – any data subject can object to the ways in which their data is being used.
- **Rights in relation to automated decision making and profiling** – this protects data subjects in cases where decisions are being made about them based entirely on automated processes rather than a human input.

Should anybody have any concerns relating to their rights in relation to their personal data, they should contact their Section Leader who will refer you to our Data Protection Lead or Group Scout Leader for more information.

Whether or not data subjects exercise their rights is up to them – the main thing to remember is that they are there if needed.

11 Further Processing

If we wish to use personal data for a new purpose, not covered by this Data Protection Notice, then we will provide data 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 prior consent to the new processing.

12 Contact Details

To exercise all relevant rights, queries or complaints, please in the first instance contact our Data Protection Lead at 1st Grasby Scout Group, 1stgrasbygsl@gmail.com.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

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