

Data Protection Policy

Purpose of this data protection policy and what it covers

This policy sets out The Scout Association's and 1st Fareham Scout Groups approach to protecting personal data and explains your rights in relation to how we may process personal data. More detail in respect of how we process and protect your data is provided below. This policy is compliant with the data protection policy of the Scout association

Important definitions

'**ICO**' is the Information Commissioner's Office, the body responsible for enforcing data protection legislation within the UK and the regulatory authority for the purposes of the GDPR

'**Local Scouting**' and '**Scout unit**' mean Scout Groups, Districts, Counties, Areas, Regions (Scotland) or Countries.

'**Personal Data**' is defined below

'**Processing**' means all aspects of handling personal data, for example collecting, recording, keeping, storing, sharing, archiving, deleting and destroying it.

'**Data Controller**' means anyone (a person, people, public authority, agency or any other body) which, on its own or with others, decides the purposes and methods of processing personal data. We are a data controller insofar as we process personal data in the ways described in this policy.

'**Data processor**' means anyone who processes personal data under the data controller's instructions, for example a service provider. We act as a data processor in certain circumstances. '**Subject Access Request**' is a request for personal data that an organisation may hold about an individual. This request can be extended to include the deletion, rectification and restriction of processing.

'**Compass**' Compass is a The Scouts Association web-based membership system. Local Scouting must comply with the Data Protection Act 1998 and the GDPR when using The Scout Association's Membership System Compass.

'**OSM**' is Online Scout Manager and is the Scout Groups web-based membership and administration system for 1st Fareham Scout Groups Youth members. OSM is fully GDPR compliant.

What is personal data

Personal data means any information about an identified or identifiable person. For example, an individual's home address, personal (home and mobile) phone numbers and email addresses, occupation, and so on can all be defined as personal data.

Some categories of personal data are recognised as being particularly sensitive ("sensitive personal data"). These include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic and biometric information, and data concerning a person's sex life or sexual orientation.

How does data protection apply to local Scouting?

Data protection legislation applies to all data controllers regardless of whether they are charities or small organisations. It applies to local Scouting in the same way as it does to other organisations. Scout units are created and run as independent charities and insofar as they collect and store personal data about members and young people, for example, they are data controllers and must adhere to the law.

What types of personal data do we collect and why?

Members and volunteers

1st Fareham Scout Group benefits from the service of a large number of members giving their time to Scouting. The Scout Association may hold personal data (including sensitive personal data) about members and volunteers on its membership database (Compass), whilst the Group may hold similar information for youth members on OSM. We believe it is important to be open and transparent about how we will use your personal data. Information we may hold about you includes the following:

- name and contact details
- length and periods of service (and absence from 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
- age/date of birth
- details of any health conditions
- details of disclosure checks
- any complaints we have received about the member
- race or ethnic background and native languages
- religion
- nationality

We need this information to communicate with you and to carry out any necessary checks on our volunteers to make sure that they can work with young people. We also have a responsibility to keep information about you, both during your membership and afterwards (due to our safeguarding responsibilities and also to help us if you leave or re-join).

Much of this information is collected from the member joining forms. We may collect basic personal data when an enquiry is made via our website, this is processed in the same way as member joining forms.

CCTV

1st Fareham Scout Group Headquarters operates a CCTV network to help prevent and detect crime and safeguard (protect) young people and others. If we can identify somebody from a CCTV image, the image must be processed as personal data.

Conditions for collecting personal data

Keeping to the law

We must keep to the law when processing personal data. To achieve this, we have to meet at least one of the following conditions:

- you have to give (or have given) your permission for us to use your information for one or more specific purposes
- we need to process the information to meet the terms of any contract you have entered into
- processing the information is necessary to keep to our legal obligations as data controller

- processing the information is necessary to protect your vital interests
- processing the information is necessary for tasks in the public interest or for us as the data controller to carry out our responsibilities
- processing the information is necessary for our legitimate interests (see below)

Also, information must be:

- processed fairly and lawfully
- collected for specified, clear and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- processed securely

Information that we share

We may have to share the personal data of our members, volunteers and trustees within appropriate levels of the Association, Charity Commission and with local Scouting, as long as this is necessary and directly related to your role within Scouting. We do not share personal data with companies, organisations and people outside the Association, unless one of the following applies;

- We have clear permission from you to do so.
- If we have to supply information to others (for example OSM) for processing on our behalf. We do this if we are asked and to make sure that they are keeping to the GDPR and have appropriate confidentiality and security measures in place.
- For safeguarding young people or for other legal reasons.

Keeping personal data secure

1st Fareham Scout Group takes steps to ensure your personal data is kept secure at all times.

- We will only store personal data on networks, drives or files that are password protected and regularly backed up.
- We have proper entry-control systems in place, and you should report any stranger seen in entry-controlled areas.
- We keep paper records containing personal data secure. If we need to move paper records, we do this strictly in line with data protection rules and procedures.
- We do not download personal data to mobile devices such as laptops and USB sticks unless absolutely necessary. Access to this information is password protected and the information is deleted immediately after use.
- We keep all personal data secure when travelling.
- Personal data relating to members and volunteers is only stored on the membership database or other specific databases (OSM) which have appropriate security in place.
- When sending larger amounts of personal data by post, you should use registered mail or a courier. Memory sticks should be encrypted.
- We will not share your passwords with anyone outside of the organisation.

- Different rights of access are allocated to users depending on their need to access personal or confidential information. No one has access to personal or confidential information unless it is needed to carry out their role.
- Before sharing personal data with other people or organisations, we will ensure that they are GDPR compliant.
- In the event that we detect or suspect a breach we will follow our defined breach response process.

Responsibilities

We expect our managers, trustees, volunteers, members and any providers we use (for example OSM) to keep to the guidelines as set out in our Data Policy and under ICO and GDPR guidance when they are using or processing personal data and other confidential or sensitive information. This is set out more clearly below.

Group Trustees

Our Group Trustees have overall responsibility for the Group and for making sure that we keep to legal requirements, including data protection legislation.

Data protection officer (DPO)

The DPO for 1st Fareham Scout Group is the Group Scout Leader. The role of the DPO is to ensure the Group is monitoring compliance with GDPR and other Data Protection laws, our data protection policies, awareness- raising, training, and audits. The data protection officer is responsible for:

- making sure that this data protection policy is up to date
- advising you on data protection issues
- dealing with complaints about how we use personal and sensitive personal data reporting to the ICO if we do not keep to any regulations or legislation

Volunteers, members and local Scouting

We expect all our volunteers to keep to data protection legislation and this data protection policy, and to follow the relevant rules set out in our Policy, Organisation and Rules (POR).

The Group executive committee (trustees) have overall responsibility for keeping to data protection regulations.

As part of our data protection duties, we will report urgently (to our local manager or the executive committee) any instance where the rules on how we handle personal data are broken (or might be broken).

Data Retention

We may keep information for our members and volunteers for the duration of their time with 1st Fareham Scout Group, this information will be removed from OSM immediately after the member has left the Group.

Personal data is retained when a member moves between sections within the Group and will automatically be transferred to the control of the relevant section leaders.

We will only keep paper records where for a short period between the collection of the personal data and input on to OSM, after which point it will be destroyed by means of a cross cut shredder.

Rights to accessing and updating personal data

Under data protection law, individuals have a number of rights in relation to their personal data.

(a) The right to information: As a data controller, we must give you a certain amount of information about how we collect and process information about you. This information needs to be concise, transparent, understandable and accessible.

(b) The right of subject access: If you want a copy of the personal data we hold about you, you have the right to make a subject access request (SAR) and get a copy of that information within 30 days.

(c) The right to rectification: You have the right to ask us, as data controller, to correct mistakes in the personal data we hold about you.

(d) The right to erasure (right to be forgotten): You can ask us to delete your personal data if it is no longer needed for its original purpose, or if you have given us permission to process it and you withdraw that permission (or where there is no other lawful basis for processing it).

(e) The right to restrict processing: In certain circumstances where, for lawful or legitimate purposes we cannot delete your relevant personal information or if you do not want us to delete it, we can continue to store it for restricted purposes. This is an absolute right unless we have a lawful purpose to have it that overwrites your rights.

(f) The obligation to notify relevant third parties: If we have shared information with other people or organisations, and you then ask us to do either (c), (d) or (e) above, as data controller we must tell the other person or organisation (unless this is impossible or involves effort that is out of proportion to the matter).

(g) The right to data portability: This allows you to transfer your personal data from one data controller to another.

(h) The right to object: You have a right to object to us processing your personal data for certain reasons, as well as the right to object to processing carried out for profiling or direct marketing.

(i) The right to not be evaluated on the basis of automatic processing: You have the right not to be affected by decisions based only on automated processing which may significantly affect you.

(j) The right to bring class actions: You have the right to be collectively represented by not-for-profit organisations.

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Most websites you visit will use cookies to help customise your experience. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

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Use of cookies on our website

The table below explains the cookies we use and why.

NAME	FORMAT	EXPIRES	REASON
ckmsg	Numeric String	6 months	Cookie message to user
__utma	Numeric String	2 years	Google Analytics
__utmb	Numeric String	30 minutes	Google Analytics
__utmc	Alphanumeric String	Session	Google Analytics
__utmz	Alphanumeric String	6 months	Google Analytics
__atuvc	Alphanumeric String	2 years	Add This Share Widget

Third party cookies

We sometimes embed content from different websites such as Add This and Twitter. Pages with this embedded content may present cookies from these websites. Similarly, when you use one of the share buttons on our website, a cookie may be set by the service you have chosen to share content through. You should check the relevant third party website for more information about these cookies.

How to manage cookies

If you wish to restrict, block or delete cookies from our website – or any other website – you can use your browser to do this. Each browser is different so check the ‘Help’ menu of your particular browser to learn how to change your cookie preferences.

Please bear in mind that if you do this, certain personalised features of this website cannot be provided to you.

Subject access requests (SAR)

You are entitled to ask us, in writing, for a copy of the personal data we hold about you. This is known as a subject access request (SAR). In line with legislation, we will not charge a fee for this information and will respond to your request within one month. This is unless this is not possible or deemed excessive, in which case we will contact you within the month of making the SAR.

Further information and contacts

Data Protection Officer (DPO)

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