

# Data Privacy Policy & Notice

**Policy Owner** - Rebecca Lincoln – Group Scout Leader

**Date of Policy** – March 2023

**To be Reviewed;** Every 12 months

**Version** - 2

**Policy Applicable to;** All Leaders including Committee members, Young Leaders, Volunteers, Suppliers, Contractors and members of the Public who are involved with 2<sup>nd</sup> Acomb (St. Stephen's) Scout Group.

## In Brief

This policy outlines data privacy notice for the group which details what personal data is and how this is processed.

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## **Version Control**

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1.0	Becky Lincoln	December 2022
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## **Data Privacy Notice: 2<sup>nd</sup> Acomb St Stephens Scout Group**

Our Privacy and Fair Processing Notice describes the categories of personal data 2<sup>nd</sup> Acomb St Stephens Scout Group process and for what purposes. 2<sup>nd</sup> Acomb St Stephens Scout Group are 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 European Union, and 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 2<sup>nd</sup> Acomb St Stephens Scout Group.

### **Who are we?**

Our Scout Group, 2<sup>nd</sup> Acomb St Stephens Scout Group, known as 2<sup>nd</sup> Acomb Scouts, 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. From this point on 2<sup>nd</sup> Acomb Scout Group will be referred to as “we” or “the Group” or “2<sup>nd</sup> Acomb Scouts”.

We are incorporated by royal charter and are regulated as a member of The Scout Association in the UK, (see [www.scouts.org.uk](http://www.scouts.org.uk) for more information). We are also registered with the Charity Commission (registration number 524830).

We hold an annual general meeting (AGM) every year. This is where members of the charity executive committee (our trustees) are elected. Any parent, guardian or carer of a youth member can volunteer to be on the executive committee at the AGM and every parent, guardian or carer has the right to attend the Annual General Meeting.

We are based at The Scout Hut, rear of Acomb Parish Church Hall, Front Street Acomb, York, YO24 3BX.

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

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

## **Your personal data – what is it?**

Personal data relates to a living individual who can be identified from that data, the data subject. 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 its possession. The processing of personal data is governed by the GDPR and DPA 2018

## **How we gather personal data**

The majority of the personal data we hold is provided to us directly by adult members or by parents, guardians or carers 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 (a youth member), this information will only be obtained from a parent, guardian or carer and cannot be provided by the young person.

## **How do we process your personal data?**

We use personal data for the following purposes:

- we collect personal and medical information for the protection of that person whilst in the care of the Scout Group:
  - ✿ 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 and provide motor vehicle insurance for drivers.
  - ✿ Bank account details, so that we are able to reimburse legitimate out of pocket expenses
  - ✿ Bank account details, so that we are able to collect subscriptions and event payments
  - ✿ Name and address details so that we are able to 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, this data is aggregated
  - ✿ 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.

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

We comply with our obligations under the GDPR and DPA 20182 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 in The Group
- ✿ 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 you of news, events, activities and services being run or attended by The Group and of the wider Scout District of York Ebor and Scout County of North Yorkshire
- ✿ to ensure and evidence your suitability if volunteering for a role in Scouting
- ✿ to contact your next of kin in the event of an emergency
- ✿ to ensure you have and maintain the correct qualifications and skills.
- ✿ We use personal sensitive (special) data for the following purposes:
  - ✿ for the protection of a person's health and safety whilst in the care of 2<sup>nd</sup> Acomb Scouts

- ✿ to respect a person's religious beliefs with regards to activities, food and holidays
- ✿ for equal opportunity monitoring and reporting.

## **Sharing your Information**

### **Young people and other data subjects**

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

We will share the personal data of youth members and their parents/guardians with The Scout Association Headquarters for the purpose of managing safeguarding cases. The privacy and security notice for The Scout Association can be found here: <https://www.scouts.org.uk/DPPolicy>. The sharing of this data will be via the Online Scout Manager platform which is used by The Group to manage youth membership. The privacy and security notice for OSM can be found here: <https://www.onlinescoutmanager.co.uk/security.html>

### **Adult volunteers**

We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association for 2<sup>nd</sup> Acomb Scouts as well as with The Scout Association Headquarters as data controllers in common.

### **All data subjects**

We will, however, share your personal information with others outside of 2<sup>nd</sup> Acomb Scouts where we need to 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 only share your data with third parties outside of the organisation where there is a legitimate reason to do so.

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<sup>2</sup>.

## How we store personal data

We are committed to the protection of your personal data.  
We generally store personal data in the following ways:

### **Compass**

The online membership system of The Scout Association, this system is used for the collection and storage of adult volunteer personal data. This includes sensitive personal data.

**Online Scout Manager (OSM)** is the online membership system of Online Youth Manager, this system is used for the collection and storage of youth member personal data.

Only authorised adult volunteers have access to the data and this is restricted to show as little data as they need to execute their role.

Parents and carers can view and edit the information held about members using the parent portal to securely access and edit this data. Parents can also consent to the Groups use of photos via the parent portal (Please see the [Photography and Social Media](#) section below).

### **Microsoft OneDrive**

For some events personal data will be stored in The Groups' Microsoft One Drive. Adult information may also be stored in this area, this may include information re reviews, training etc.

## Printed records

Printed records and data held while attending events – paper is sometimes used to capture and retain some data for example:

- ✿ Gift Aid administration
- ✿ Event registration
- ✿ Health and contact records forms (for events)
- ✿ Events coordination with event organisers

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

In addition, adult volunteers will hold some personal data on local spreadsheets/databases.

### **Third Party Data Processors**

2<sup>nd</sup> Acomb Scouts, 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 data of leaders, adults and parents, guardians or carers who have undergone a Disclosure and Barring Service (DBS) check.

**Online Youth Manager Ltd** (Online Scout Manager) which is used to record the personal data, 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.html>

**Microsoft 365** used to store contract details of adult members of the Group, send and receive emails, share calendars for public and internal events, share files internally and store data.

**Gmail** used to maintain a calendar to highlight when Redmire Station house is empty or busy

**GoCardless** (Payment Processor) for processing direct debit payments for subs and events.

**Barclays Bank** for processing receipt of subscriptions or fees and payment of out-of-pocket expenses to leaders/ members.



**Lloyds Bank** for processing and receiving payments for Redmire Station house and 2<sup>nd</sup> Acomb St Stephen's Scout Group fundraising.

**HMRC** for processing Gift Aid claims.

**Go Daddy** hosts the website, 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.

**Amazon Web Services** hosts the website for Redmire Station House, limited personal data is shared to enable the creation of user accounts.

## Transfers outside the UK

2<sup>nd</sup> Acomb Scouts will not transfer your personal data outside of the UK. The only exception is where an event is taking place outside of the UK and it is necessary to provide personal data 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. We will always notify data subjects prior to sharing data outside of the UK.

## How do we protect personal data?

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for as long as necessary for the purpose for which it was collected.

## How long do we keep your personal data?

We will retain your personal data, throughout the time individuals are an adult or youth member of 2<sup>nd</sup> Acomb Scouts.

For youth members, to fulfil our legal obligations for insurance and legal claims, we will retain:

- ✿ full personal data for a period of up to one year after members have left the Group
- ✿ limited information (just name, and attendance records) for a period of up to 15 years (or until the age 21)
- ✿ The Scout Association may retain personal data relating to Adults indefinitely.

For parents, carers and guardians, we will keep any Gift Aid Claim information for 7 years as required by HMRC .

## Your rights and your personal data

Adult members and the parents, carers or guardians of youth members as data subjects have the right to object to how we process their personal data. Members also have the right to access, correct, sometimes delete and restrict the personal data we use. In addition, they have a right to complain to us and to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

Unless subject to an exemption under the GDPR and DPA 2018, data subjects have the following rights with respect to their personal data:

- ✿ **The right to be informed:** a right to know how your data will be used by our Scout Group
- ✿ **The right to access:** members can ask the Group to share the data held related to them
- ✿ **The right to rectification:** this just means that members can update their data if it's inaccurate or if something is missing. Members can view and edit their personal data directly on our online membership systems Online Scout Manager and Compass
- ✿ **The right to erasure (the right to be forgotten):** this means that members have the right to request that we delete any personal data held related to them. There are some exceptions, for example, some information can be retained for legal reasons
- ✿ **The right to restrict processing:** if members think there's something wrong with the data being held about them, or they aren't sure if we are complying with the rules, they can restrict any further use of that data until the problem is resolved
- ✿ **The right to data portability:** this means that if members ask us 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:** members can object to the ways their data is being used. This should make it easier to avoid unwanted marketing communications and spam from third parties.

Rights in relation to automated decision making and profiling – this protects you in cases where decisions are being made about you based entirely on automated processes rather than a human input.

## Further processing

If we wish to use your personal data for a new purpose, not covered by this 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.

## Breach Notification

We will notify our users of any breach of data via email within 72hrs of identifying the breach.

## Website

[www.2ndacombscoutgroup.co.uk](http://www.2ndacombscoutgroup.co.uk) is used to provide information to parents, guardians or carers and members about the how the Group is run and the activities that are provided. Links to the Group's policies and The Scout Association web site are provided as is access to the Parent Portal, via a link to Online Scout Manager (OSM).

## Cookies

Cookies are in use on our website.

## Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Privacy information page: <https://privacy.google.com/businesses/compliance/>.

As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at [the About Cookies website](#) which offers guidance for all modern browsers

## **Photography and Social Media**

Promoting Scouting is important to the Group, as such it is in the interest of all members to advertise the Movement through the use of appropriate positive images.

Social media is used as a means of promoting our brand and our activities. Leaders have undertaken specific training for handling these tools and guidance is available to them from The Scout Association. Our Public Facebook Page, Instagram, WhatsApp and Twitter accounts allow us to quickly share news and photos/ videos that we think are appropriate to a wider audience. As these are used as promotional tools neither is restricted or "closed" in any way.

When we are away at events, and even at our weekly meetings, it is common for a number of photos to be taken and published on our social media feeds. While a selection of these photos may be posted to our social media channels, the majority will be kept indefinitely as a historical record of the Group's activities. Images are stored securely in our OneDrive in a section only visible to registered users (who will have their accounts approved by the Group's leadership team). We know from feedback that parents and carers find these photographs interesting and reassuring.

The Group also has a closed Facebook page which all leaders, members of the Active Support Unit and parents, guardians or carers of current members can access. This closed Group enables communication between all members of the Facebook Group and is used to share events, photos, questions and answers and information that is deemed useful and positive for our members. The moderators of the Group approve the membership and ensure the content is pertinent to Scouting and is appropriate for the consumption of all. The membership of the closed Facebook Group is reviewed quarterly and members removed if they are no longer active with the Scout Group. However, Facebook is not a secure medium and we cannot control how Facebook and it's users use and process any images posted there.

We will always endeavour to:

- ✿ Never publish personal details with any photo/image/video that would make the subject of the photograph identifiable
- ✿ Consider the content of all photo/image/video for good taste before publication
- ✿ Only publish photos/images relating to Scouting
- ✿ Remove any photo/image/video that breaches these guidelines as quickly as possible after it is brought to our attention - please use the contact form to inform administrators of any inappropriate content.

While we will endeavour to keep to the above guidelines we cannot control the legal right of third-party photographers to take pictures taken in a public place and publish them to websites and other publications that are outside of our control.

Parents can record their consent for the Group's use of photographs by accessing the parent portal.

We understand that some people do not want photographs of their child published on social media. If that is the case, then you can refuse consent for your child to be photographed, and this will not affect their membership of the Group. However, for the reasons given above, we cannot ensure that they will not appear in the background of either our photos or other people's photos which may then get posted on the internet, although we will use reasonable efforts to ensure that this does not happen.

### **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact our Group Scout Leader at [gsl@2ndacombscoutgroup.co.uk](mailto:gsl@2ndacombscoutgroup.co.uk)

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.