

Keeping Our Information Safe Policy

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, Committee members, Young Leaders, Volunteers, Suppliers, Contractors, Third Party workers and members of the Public who are involved with 2nd Acomb (St. Stephen's) Scout Group.

In brief

Information is an important part of Scouting, and we are committed to maintaining and protecting all information based on its sensitivity.

No matter what your role is or where you fit in to 2nd Acomb (St. Stephen's) Scout Group, we all need to work securely to ensure information is not put at risk.

We are committed to collecting and using data fairly and in accordance with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018)

Whilst we have a responsibility to be as open and transparent as possible the information of our young people, parents/guardians, leaders, and third-party workers requires protection and, in some cases, special handling.

The processing of personal data is governed by General Data Protection Regulation and the Data Protection Act (GDPR & DPA).

This policy will tell you how to do that.

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Who are we?

Our Scout Group, 2nd Acomb (St Stephen's) Scout Group, known as 2nd 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 2nd Acomb (St. Stephen's) Scout Group will be referred to as "we" or "the Group" or "2nd Acomb Scouts".

We are incorporated by royal charter and are registered and regulated by The [Scouts Association](#) in the United Kingdom.

We are also registered with the Charity Commission and our registration number is **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.

Every parent, guardian or carer also has the right to attend the Annual General Meeting.

We are based at The Scout Hut at the 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 young people) and through our relationship with supporters, donors and funders.

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

What is Information?

Our information is **any information** that you need to carry out your role in 2nd Acomb (St. Stephen's) and support the group as a whole. This includes, but is not limited to, **any type** of information about our young people, parents/carers, leaders, committee members, third parties or future initiatives/events.

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Classifying Information

Different types of information must be handled appropriately to make sure we meet legal and regulatory requirements and protect our Scout Group. We must identify the level of sensitivity and the harm that might result from its loss or unauthorised disclosure.

To do this, we classify all information.

All information will fall into one of three classification categories

Public

All information which is easily accessible by any member of the public such as a blog on a website, a post on social media or an article in a newspaper.

This information can be shared freely with anyone

Confidential

This information is private to our Group or to the Scout Association and we must make sure we don't share it with anyone who doesn't need to know or need to have it.

You must always dispose of Confidential Information using crosscut shredders

Highly Sensitive

This information is our most critical information and if it is lost or shared inappropriately could result in major brand or reputational consequences for our Group and Scout Association as a whole. Highly sensitive information must never be displayed on the wall, noticeboards or anywhere that can be seen by visitors.

How We Gather Personal Data

The majority of the personal data we hold is provided to us directly by adult members or by the parents, guardians or carers of our young people 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.

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

We fulfil our responsibilities under GDPR & DPA by keeping all 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 suitable technical measures are in place to protect personal data.

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 2nd Acomb (St. Stephen's) Scout Group
- ✿ To maintain our own financial accounts
- ✿ To administer membership records
- ✿ To fundraise and promote the interests of Scouting
- ✿ To manage our volunteers
- ✿ To contact you when needed
- ✿ 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 2nd Acomb Scouts.
 - To respect a person's religious beliefs with regards to activities, food and holidays
 - For equal opportunity monitoring and reporting.

How Do We Process your Personal Data?

We use personal data for the following purposes:

- ✿ Personal and medical information for the protection of that person whilst in the care of 2nd Acomb (St. Stephen's) 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 within The Scout Association.
- ✿ 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 or refunds.
- ✿ 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.
- ✿ The Charities Commission and the independent auditor/reviewer of 2nd Acomb (St. Stephen's) Scout Group will have access to the information when required in audits.

Sharing your Information

Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment in 2nd Acomb (St. Stephen's).

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: [Security & Privacy Notice](#)

The sharing of this data will be via the Online Scout Manager platform (OSM) which is used by 2nd Acomb (St. Stephen's) to manage young person's membership as well as bookings for Redmire Station House.

The privacy and security notice for OSM can be found here: [OSM Privacy & Security Notice](#)

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 2nd Acomb (St. Stephen's) 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 2nd Acomb (St. Stephen's) 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.

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, data is collected and stored on this system of young member's, volunteers and the primary hirers for Redmire Station House. 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.
- ✿ **GoCardless (Payment Processor)** - for processing direct debit payments for subs and events
- ✿ **HMRC** - for processing Gift Aid claims.
- ✿ **Barclays Bank** – For processing receipt of subscriptions, fees or payment of out-of-pocket expenses to leaders and members
- ✿ **Lloyds Bank** – For processing payments for hiring Redmire Station House
- ✿ **Microsoft 365** - used to store contact details of adult members of the 2nd Acomb (St. Stephen's), to send and receive emails, share calendars for public and internal events, share files internally and store data.
- ✿ **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 Redmire website, limited personal data is shared to enable the creation of user accounts for the management of the website
- ✿ **Google Mail** – Used as a calendar which is linked to an email address for the purpose of tracking when Redmire Station House is busy, limited personal data is shared to enable the creation of the user account.

How do we Protect Personal Data?

- ✿ We 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.
- ✿ We will retain your personal data, throughout the time individuals are a young or adult member of 2nd Acomb
- ✿ To fulfil our legal obligations for insurance and legal claims, we will retain the data of our young members
 - full personal data for a period of up to one year after members have left 2nd Acomb (St. Stephen's)
 - limited information (just name, and attendance records) for a period of up to 15 years (or until they reach the age of 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, parents, carers, guardians of young members and primary hirers of Redmire Station House, as data subjects have the right to object to how we process their personal data. Members and Primary Hirers 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 Commissioners Office](#)

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 2nd Acomb (St. Stephen's)
- ✿ The right to access – members and primary hirers can ask 2nd Acomb (St. Stephen's) to share the data held related to them
- ✿ The right to modification: 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 (OSM) and Compass
- ✿ The right to erasure (the right to be forgotten): this means that members and Primary Hirers 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 as already stated in this policy.

- ✿ 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 a members asks 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.

Website

[2nd Acomb Scout Group](#) is used to provide information to parents, guardians, carers, members and members of the public about the how 2nd Acomb (St. Stephen's) Scout 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).

[Redmire Station House](#)

Handling Information

Loss or misuse of information or data is a big risk to 2nd Acomb (ST. Stephen's). If we don't handle information responsibly, it can be lost or compromised which would put us at risk of fines from governing bodies, it would be damaging to us and the Scout Association and would have an impact on the trust of all associated with 2nd Acomb (St. Stephen's)

We need to:

- ✿ Classify Information correctly – then use, store and dispose of it appropriately
- ✿ Information must be protected – keep it secure, lock devices and never share passwords or data you don't need to.
- ✿ Retain data according to the need of 2nd Acomb (St. Stephen's) – don't keep longer than necessary
- ✿ Loss of information must be reported – always report data incidents such as emails sent incorrectly, or any papers that are lost and hold confidential or highly sensitive information to GSL
- ✿ We will notify anyone affected by a data breach within 48 hours of identifying a breach.
- ✿ 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 2nd Acomb (St. Stephen's) use of photos via the parent portal.
- ✿ **Consent is requested from parents/guardians to take photographs of our members in any area's which are not publicly accessible.**

- ✿ 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.

Social Media & Photography

Promoting 2nd Acomb (St. Stephen's) Scout Group as well as The Scout Association is important and it is in the interest of all members to advertise using appropriate positive images.

Social media is used as a means of promoting our brand and our activities. Our Public Facebook Page, Facebook parents page, Instagram, WhatsApp and Twitter groups allows us to quickly share news and photos that we think are appropriate to a wider audience.

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.

However, Facebook is not a secure medium and we cannot control how Facebook and its 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 before publication
- ✿ Only publish photos, images and videos relating to Scouting
- ✿ Remove any photos, images and videos that breach these guidelines as quickly as possible after it is brought to our attention.
- ✿ 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 or event such as St. George's Day 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 2nd Acomb (St. Stephen's). 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.

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.

Consent is requested from parents/guardians for photos/videos of their child to be taken, stored and shared internally in the meeting location, local press, Scout websites and social media. (Regardless of this consent, the group/unit is not responsible for photos taken by other parties.)

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.



Scouts