



**Scouts**

Elstree and District

Data Protection  
Policy



## **What is this privacy notice/policy?**

This Data Privacy Notice/Policy describes the categories of personal data Elstree and District Scouts process and for what purposes. Elstree and District Scouts<sup>1</sup> 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 Elstree and District Scouts

Who we are

Elstree and District Scouts are an excepted charity, registered with the Scouts Association.

The Data Controller for Elstree and District Scouts is the Executive Committee who are appointed at an Annual General Meeting and are Charity Trustees<sup>4</sup>. The Chair of the Charity Trustees is Moley Brown who can be emailed at [chair@elstreescouts.org.uk](mailto:chair@elstreescouts.org.uk)

From this point on Elstree and District Scouts will be referred to as “we”.

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

## **The data we may process**

The majority of the personal information we hold, is provided to us directly by you or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership system Compass. In the case of adult members and volunteers, data may also be provided by third parties, such as the DBS Check.

Where a member is under the age of 18, this information will only be obtained from a parent or guardian and cannot be provided by the young person.

We may collect the following personal information:

- **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.
- Bank account details, payroll information and tax status information - so that we are able to pay any staff that might be employed by us and collect gift aid from HMRC where donations are made, and also instruct payments from members when required.
- 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.
- 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.
- Safeguarding Information- to ensure Scouting is a safe space for young people and adults

### **The lawful basis we process your data by**

We comply with our obligations under the GDPR and DPA 2018 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 Elstree and District Scouts
- 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 Elstree and District Scouts
- 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 Elstree and District Scouts

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

### **Our retention periods**

We will keep certain types of information for different periods of time in line with our retention policy.

| Data Process                                     | Data Type                                      | Retention  | Justification   |
|--|--|--|---|
| Want to Join                                     | Personal data                                  | 5 years or until the members joins, whichever is shorter   | To keep them informed of their joining status   |
| Joining –including the role and dates of joining | Personal and Sensitive data (special category) | 10 years after leaving the data will be reduced to only include name, date of birth, awards, training records, events attended, roles and permits held and any complaints in summary format. This remaining data will be retained for 100 years. | The 10-year retention of all data is required to provide tenure and service records in the event an individual wants to rejoin. The 100 years retention of data is required for evidence requests from statutory agencies |
| Youth award registrations                        | Personal and Sensitive data (special category) | 6 months after the member turns 25   | To retain their award registrations for the duration of the eligibility period  |
| Research surveys                                 | Personal and Sensitive data (special category) | 18 months  | To keep a collation of completing members and compare answers from the previous year  |
| Vetting  | Personal Data – Disclosure Certificate         | 6 months after issue   | In line with DBS, Access NI and Disclosure Scotland Code of Practice  |

|  |  |  |   |
|--|--|--|---|
| Safeguarding – Adult volunteer perpetrator | Personal and Sensitive data (special category) | Adult – 100 years after case closure. Will include all case notes, including those of witnesses and young person, until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject to the joining data process retention period.            | Required for required for evidence requests from statutory agencies |
| Safeguarding – Young person perpetrator    | Personal and Sensitive data (special category) | Young Person – 100 years after case closure. Will include all case notes, including those of witnesses and adult volunteers, until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject to the joining data process retention period. | Required for evidence requests from statutory agencies              |

|  |  |   |  |
|--|--|---|--|
| Incident – personal injury (including sexual abuse/psychological damage) | Personal and Sensitive data (special category) | 4 years after incident, or 4 years after alleged victim turns 18 if later | Fight a case – Limitation act 1980       |
| Incident – not involving personal injury                                 | Personal and Sensitive data (special category) | 7 years after incident, or 7 years after alleged victim turns 18 if later | Fight a case – Limitation act 1980       |
| Permit Assessments   | Personal data                                  | 6 months after the permit expires   | Required for permit renewals and queries |

The Scout Association’s Data Protection Policy can be found [here](#) and the Data Privacy Notice [here](#).

## Sharing your information

### Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment in the Elstree and District Scouts. However, information may also be shared with Groups, Hertfordshire County Scouts, and The Scout Association where necessary.

### 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 the Elstree and District 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 Elstree and District Scouts where we need 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.

## **How we store your personal data**

We generally store personal information in the following ways:

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

Online Scout Manager- is a membership management platform that allows us to view details about members within the district, including those on waiting lists, this system is used for the collection and storage of young person and adult volunteer personal data.

Office 365- is an online communication platform, where we host our emails and portals, which contains important documents, this system is used for the collection and storage of young person and adult volunteer personal data.

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

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.

## **Further Processing**

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

## **Communication**

All electronic communication with, through and by the District must only be made from approved district email addresses, approved district and Scout association systems.

Personal emails must not be used for internal communications and personal emails should not be used to send external communications.



## **Breaches of this Policy**

Breaches of this policy will be investigated by the District Commissioner and/or District Chair, who will take necessary actions to rectify any breaches of this policy, as well as ensure that individuals are appropriately managed in this process.

## **Your Rights**

As a Data Subject, you have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you 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, you have the following rights with respect to your personal data:

- The right to be informed – you have a right to know how your data will be used by us.
- The right to access your personal data – you can ask us to share with you the data we have about you. This is a Data Subject Access Request.
- The right to rectification – this just means you can update your data if it's inaccurate or if something is missing. Adult members will be able to edit and update some information directly on The Scout Association's Compass membership system.
- The right to erasure – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held by The Scout Association for legal reasons.
- The right to restrict processing – if you think that we are not processing your data in line with this privacy notice then you have the right to restrict any further use of that data until the issue is resolved.
- The right to data portability – this means that if you ask us we will have to share your data with you 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 – you can object to the ways your data is being used.
- Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by us.

## **Who to contact**

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact us by emailing Moley Brown, District Chairperson <[chair@elstreescouts.org.uk](mailto:chair@elstreescouts.org.uk)>



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