Data Protection and IT Security Policy
for
1st Shepperton (St Nicholas) Scout Group

About this policy

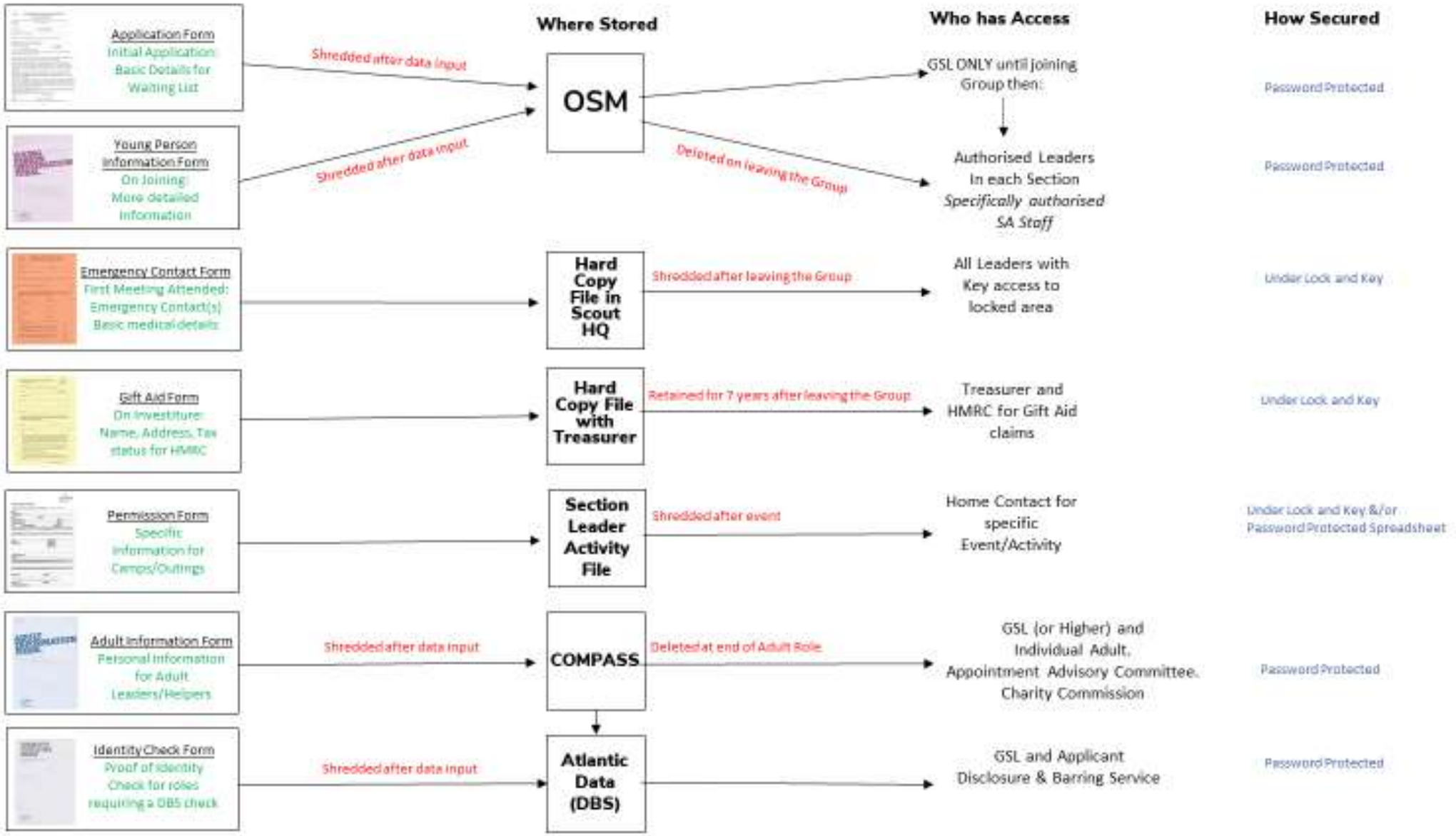
This Data Protection and IT Security policy applies to all operations of 1st Shepperton (St Nicholas) Scout Group
The policy is designed to ensure that 1st Shepperton (St Nicholas) Scout Group complies with its obligations under the General Data Protection Regulation (GDPR) in 2018 and conforms to the following eight data protection principles:

1. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
2. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
3. Personal data shall be accurate and kept up to date.
4. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
5. Personal data shall be processed in accordance with the rights of data subjects under the Act.
6. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
7. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The Group's Data Protection Lead is the owner of this policy and responsible for its regular review (at least annually) and update as necessary.

The personal data we hold:

Data description	Personal data included	Stored using	Retention policy	Responsible officer
Information about our members	Contact information, badge records, activity records	Online Scout Manager (OSM) and Compass	Retained whilst a current member. A subset of data is retained	Section Leader (Activity Records) Parents (Contact information)
	(Includes sensitive data, as defined by UK Scout Association*)*		2 years after membership to support continuity should the person reapply for membership	
Information about Safeguarding incidents	Contact information and information regarding the nature of any allegation, the status and outcome of the investigation	Paper, County email and Electronic Files	Indefinitely	Group Scout Leader
Information about accidents and near misses	Contact details and nature of accident	Paper Forms	3 years after end of investigation	Group Scout Leader
Information about our event attendees	Contact details, next of kin information, medical conditions and special diets. *(Includes sensitive data, as defined)*	Paper forms stored in online Scout Manager	Destroyed after event, unless medical incident and then kept for 3 years.	Event Leader
	Contact information and nature of enquiry, which may contain personal data	email system and spreadsheet	Indefinitely	Group Scout Leader or Group Secretary
Information about general enquirers	Contact information and nature of enquiry.	email system	Indefinitely	Group Scout Leader or Group Secretary
Waiting List Applications	May contain personal data	Online Scout Manager (OSM)	Until leaving the Group	Group Scout Leader
Information about complainants	Contact information and which District they belong to	email system	Indefinitely, unless the individual requests removal	Group Scout Leader or Group Secretary


Where Stored
Who has Access
How Secured
Application Form
Initial Application
Basic Details for
Waiting List
Shredded after data input
OSM
GSL ONLY until joining
Group then:
Password Protected
Young Person
Information Form
On Joining:
More detailed
Information
Shredded after data input
Deleted on leaving the Group
Authorised Leaders
In each Section
Specifically authorised
SA Staff
Password Protected
Emergency Contact Form
First Meeting Attended:
Emergency Contact(s)
Basic medical details
Hard
Copy
File in
Scout
HQ
Shredded after leaving the Group
All Leaders with
Key access to
locked area
Under Lock and Key
Gift Aid Form
On Investiture:
Name, Address, Tax
status for HMRC
Hard
Copy File
with
Treasurer
Retained for 7 years after leaving the Group
Treasurer and
HMRC for Gift Aid
claims
Under Lock and Key
Permission Form
Specific
Information for
Camps/Outings
Section
Leader
Activity
File
Shredded after event
Home Contact for
specific
Event/Activity
Under Lock and Key &/or
Password Protected Spreadsheet
Adult Information Form
Personal Information
for Adult
Leaders/Helpers
Shredded after data input
COMPASS
Deleted at end of Adult Role
GSL (or Higher) and
Individual Adult,
Appointment Advisory Committee,
Charity Commission
Password Protected
Identity Check Form
Proof of identity
Check for roles
requiring a DBS check
Shredded after data input
Atlantic
Data
(DBS)
GSL and Applicant
Disclosure & Barring Service
Password Protected

For completeness, we also hold the following information which is not categorised as Personal Data but has the following retention policies applied:

Data description	Retention policy	Responsible officer
Finance – Deed of covenant/Gift aid declaration and legacies	6 years after last payment made	Group Treasurer

Our Security Policies

The following security policies will apply to the storing of personal data as outlined in this policy. These security policies are mandatory.

Overarching principles

- **Need to know** – We only give people access to the data that they need to carry out their role. If people change roles, we review access accordingly.
- **Passwords** – We ask our leaders and other volunteers to use systems that require complex passwords.
- **Commercially available software** – where possible we use third party software to store personal data), where the software is regularly testing and patched for security vulnerabilities.
- **Transporting data** – We only transport data using physical media if absolutely necessary.
- **Education** – We will regularly remind and update our leaders and other volunteers about their obligations under this policy and general IT Security awareness.
- **We keep people informed** – we tell people why we are collecting their data and how we use it, at the point in time we collect it.

Physical storage

- **Limiting storage** – We limit the amount of personal data we physical store to the absolute minimum. Only those with a need to know will have access to the data.
- **Locked** – Physical documents with personal data will be stored in a locked room at Headquarters and only leaders have access.

Volunteer equipment

- **Virus –** A virus scanning service should be installed on all devices and regularly checked.
- **Removable storage –** Removal devices that will contain personal data should be password protected.

Volunteer emails

- **Restriction** - Our Leaders should use the Online Scout Manager (OSM) for sending emails to parents and we encourage them to consider whether to have an 'official' email address for OSM rather than their personal email address for Scouting Section emails as their primary method for receiving, storing and sending of emails, and always when they are transmitting personal data.
- **Virus, Malware and Phishing protection** – All emails should be scanned for virus, malware and phishing.

Third parties

- **Third party processing** – Other than the Scout Association, Online Scout Manager, we limit the use of third parties to process personal data collected by 1st Shepperton (St Nicholas) Scout Group and only do so where we have the express permission of the Group Chair.
- **Third party compliance** – We ensure third parties we contract with to store personal data comply with the principles of this policy, have an information security policy in place and ideally hold an information security standard (such as ISO 27001).
- **Limiting exports** – When exporting data from third party systems (e.g. Compass, Online Scout Manager), we only export the data we need for the purpose we need it for.

Consent

Where we do not have a lawful basis to hold or process data, we will seek the express consent of individuals to hold data about them. This will be by specific and unambiguous statements that must be opted-into on any forms (electronic or otherwise) and systems. In some circumstances due to the organisation of the Scouts, we ask our members to ensure they have express consent for the data they are submitting to us.

Data Subject Access Requests

Should a member of 1st Shepperton (St Nicholas) Scout Group request a copy of any personal information which the Scout Group holds, then the following process should be followed:

- The individual should write to our Data Protection Lead (stnicksdataprotection@btinternet.com) outlining the personal data they are seeking to obtain.
- Our Data Protection Lead will acknowledge the request by email.
- Our Data Protection Lead will seek to verify the identity of the individual and that they are lawfully entitled to request a copy of the personal data. This may involve asking for information such as a membership number, date of birth, address, or documentary evidence.
- Our Data Protection Lead will collate the data requested, noting that we cannot provide data held by other organisations such as the Scout Association, Online Scout Manager, the Scout District. The data should be carefully analysed to ensure it does not refer to any other individuals, in which case it should be redacted.
- Within 30 days of the receiving the request, our Data Protection Lead will provide the data to the individual. This will normally be by email.
- There will be an administration charge of £5.00

For more information about our legal obligations, refer to the ICO website.

Right to erasure (Right to be forgotten)
Should a member of 1st Shepperton (St Nicholas) Scout Group or a member of the public wish for their personal information to be erased, then the following process should be followed:

- The individual should write to our Data Protection Lead (stnicksdataprotection@btinternet.com) outlining the personal data they are seeking to erase.
- Our Data Protection Lead will consult the Group Chair and Group Scout Leader to make a decision as to whether the request should be processed. Guidance from the ICO should be followed. Whilst 1st Shepperton (St Nicholas) Scout Group will not seek to refuse the request unreasonably, it has a number of statutory obligations to comply with and uses personal data as part of its vetting and safeguarding procedures.
- If it is deemed that the data shall be deleted, then our Data Protection Lead will confirm to the individual the timescales involved and instruct the necessary responsible officer to delete it.

Correcting inaccurate personal data
Should a member of 1st Shepperton (St Nicholas) Scout Group believe that information that we hold about them is inaccurate, they should correct it by using their personal log-in to OSM and/or Compass and amending the data as necessary.

Reporting a breach
A breach is defined as any event which "leads to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data". If a breach occurs, our Data Protection Lead will be immediately informed (stnicksdataprotection@btinternet.com).

Our Data Protection Lead (in consultation with the Group Chair and Group Scout Leader) will need to consider if the breach is likely to "result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage". If it does, the Information Commissioner's Office should be informed within 72 hours of the breach occurring.

If the breach results in a high risk to the rights of the individuals involved, they should also be informed directly.

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.

Or

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk.

Group Website
The Group shares a summary about the data it holds and how it processes it on its website at (www.1stsheppertonscouts.org). The website also provides information on how to submit a data subject access request and right to be forgotten request