

# Data Privacy Notice

## for

### 1st Shepperton (St Nicholas) Scout Group



Our Privacy and Fair Processing Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).

#### **Who are we?**

1<sup>st</sup> Shepperton (St Nicholas) Scout Group is a youth charity. Our mission is to engage and actively support young people in their personal development, empowering them to make a positive contribution to society. We are regulated as a member of the UK The Scout Association, (see [www.scouts.org.uk](http://www.scouts.org.uk) for more information.) As part of The Scout Association we are not required to be individually registered with the UK Charity Commission.

Every year in June we hold an annual general meeting where members of the charity executive committee (our trustees), are elected, any parent of a youth members can decide to be in the executive at the AGM and every parent has the right to attend the Annual General Meeting.

Our 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 and through our relationship with supporters, donors and funders.

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

Personal data relates to a living individual who can be identified from that data. 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 such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

#### **How we gather personal information**

The majority of the personal information we hold, is provided to us directly by parents / legal guardian in either paper form or 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, this information will only be obtained from a parent / guardian and cannot be provided by the young person.

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

We comply with our obligations under the "GDPR" 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.

We process the data to have the ability to contact the member, parents and guardians, to inform them of meetings, events that the group itself may be running or attending.

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
- we collect religious data to respect a person's beliefs with regards to activities, food and holidays
- To administer membership records
- To fundraise and promote the interests of the Scout Group
- To manage our volunteers
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events and activities running at 1<sup>st</sup> Shepperton (St Nicholas) Scout Group.

#### **4. What is the legal basis for processing your/your child's personal data?**

We only use your personal information where that is permitted by the laws that protect your privacy rights.

We only use personal information where:

- a) We need to use the information to comply with our legal obligations
- b) We need to use the information to contact with you, regarding meetings, events, collection of membership fees etc, (i.e. for the day to day running of the group)
- c) The processing is necessary for the person's legitimate interests or the legitimate interests of our Scout Group unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

#### **5. How we store personal data**

We are committed to the protection of your personal information.

We generally store personal information in one of two secure digital online database systems, where access to that data is restricted and controlled.

**Compass:** - is the online membership system of The Scout Association, this system is used for the collection and storage of Adult personal data. Adult members have access to their own records and can update information such as change of address.

**Online Scout Manager (OSM)** is an online membership system run by Online Youth Manager Ltd, this is a secure membership database where we store the personal information of Adults and Youth members for the day to day running of the group. Section Leaders only have access to the information about their section members. Parents can access the record for their child and update address and contact details. The Group Scout Leader can see information for all sections.

#### **Printed records and Event data**

Paper is still used within the sections to capture and retain some data for example the following: -

- New joiners form.
- New joiners waiting lists.
- Health and contact records update forms.
- Gift Aid Collection forms.
- Events consent from parents.
- Award notifications/nominations

In the case of **Joining and Waiting List forms** this information is securely held by the Group Scout Leader, and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

**Health and Contact Update Forms** are updated annually in September and are kept in the locked Scouters room for immediate access in the event of an emergency during a meeting at Headquarters. This form also enables the Scout Group to gather regular consent to hold your data.

**Gift Aid** collection forms, will be securely held by the Groups Treasurer to aid in the collection of Gift Aid for monthly membership fees, we have a legal obligation to retain this information for 7 years after our last claim.

### Events

At events such as camps it is necessary to fulfil our legal obligations we will be required to potentially have a less secure means to access personal information, such as printouts of personal contacts and medical information, (including specific event contact forms), 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/camp.

### Fundraising

Family email addresses will be sent as a password protected document to the organiser of our Scout Group stall at the annual Shepperton Village and St Nicholas School Fairs to ask for volunteers and to circulate rotas and hygiene procedures. The email to parents will be blind copied (bcc) to ensure that email addresses are not publicly circulated.

We will ensure:

- a) Transfer of paper is secure, such as physical hand to hand transfer or registered post.
- b) Paper forms are securely destroyed after use.
- c) Secure destruction will be through a shredding machine or securely burned.
- d) Always keeping the paper records secure, especially when in transit.
- e) If transferred to somebody, we will audit that they return them when the event is complete.

### Awards

Sometimes we may nominate a member for national award, (such as Queens Scout or Duke of Edinburgh award), such nominations would require we provide contact details to the awarding organisation, this is most often done on paper via registered post.

## 6. Sharing and transferring personal Information

We will only normally share personal information within our Scout Group leaders and executive members.

We will however share your personal information with others outside our Scout Group where we need meet or enforce a legal obligation. This may include Spelthorne Scout District, The Scout Association and its insurance subsidiary "Unity", local authority services and law enforcement, and we will only share your personal information to the extent needed for those purposes. *Additionally, from August 2020, the Group Executive Committee has approved a project whereby there is some limited data sharing between OSM and the Scout Association (SA). There are 2 elements to this:*

- *Authorised members of the SA Headquarters Safeguarding Team will be able to access specific personal details (name/date of birth/contact details) of members as a last resort if information cannot be obtained through the usual channels – or in the event of an emergency.*
- *Authorised staff at SA will be looking at anonymous data in OSM that will not be personally identifiable. This will be general membership data (numbers/ages/postcodes/genders/Groups) so that they can assess and report on National trends – not at local Group level.*

If you or your child move from our Scout Group to another Group or an Explorer Scout Unit we will transfer your personal information to them via Compass.

We will never sell your personal information to any third party for the purposes of marketing

Sometimes we may nominate a member for national award, (such as Scouting or Duke of Edinburgh award) such nominations would require we provide contact details to that organisation.

Your personal data will be treated as strictly confidential. We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so. We will take steps to anonymise the data we provide (i.e. collective reporting on gender, ethnicity, age, etc.). If identifiable data is to be shared we will seek your consent.

### **Third Party Data Processors**

1<sup>st</sup> Shepperton (St Nicholas)], 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 information of leaders, adults and parents who have undergone a Disclosure and Barring Service (DBS) check.
- Online Youth Manager Ltd (**Online Scout Manager**) which is used to record the personal information, 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.php>
- **Dropbox** occasionally used for secure transfer of limited personal information for events.

### **Automated decision making**

1<sup>st</sup> Shepperton (St Nicholas) does not have any automated decision-making systems.

### **Transfers outside the UK**

We will not transfer your personal information outside of the UK, with the exception where an Event is taking place outside of the UK and it is necessary to provide personal information 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.

### **7. 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 is used. After initial input to OSM and/or Compass, it is the subject's responsibility to routinely check and update their own record(s) as necessary.

### **8. How long do we keep your personal data?**

We will retain your personal information, throughout the time you/your children are a member of our Scout Group .

We will retain your full personal information for a period of one year after your child has left

1<sup>st</sup> Shepperton (St Nicholas) Scout Group and in a much more limited form (just name, badge and attendance records) for a period of up to 15 years (or until the age 21) to fulfil our legal obligations for insurance and legal claims.

We will also keep any Gift Aid Claim information for the statutory 7 years as required by HMRC.

### **9. Your rights and your personal data**

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 data protection regulator.

Unless subject to an exemption under the GDPR, 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 our Scout Group;
- **The right to access your personal data** – Each individual may access their own data by personal log-in to OSM and/or Compass at any time;
- **The right to rectification** – this just means you can update your data if it's inaccurate or if something is missing. You can view and edit your personal information directly on our online membership systems Online Scout Manager;
- **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 can be held for legal reasons;
- **The right to restrict processing** – if you think there's something wrong with the data being held about you, or you aren't sure if we are complying to rules, you can restrict any further use of your data until the problem 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. 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 decision are being made about you based entirely on automated processes rather than a human input.

Please contact our Group Scout Leader / Data Protection Lead for more information, in the first instance.

Whether or not you exercise your new rights is up to you – the main thing to remember is that they're there if you need them.

## 10. 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.

## 11. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact our Data Protection Lead: [stnicksdataprotection@btinternet.com](mailto:stnicksdataprotection@btinternet.com)

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.