



## **31st Itchen North (Amazon) Sea Scout Group** **Data Protection, Confidentiality and Privacy Policy**

### **1. Purpose Of The Policy**

The regulations on data protection, known as the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA 2018), apply to all organisations that hold any information that identifies living people. This is known as personal data. The 31st Itchen North (Amazon) Sea Scout Group (the Group) is committed to fully complying with the GDPR and DPA 2018.

This policy sets out the Group's approach to protecting personal data and explains the rights of Young People, Parents/Guardians and Adult Members in relation to how personal data is processed.

Every Adult Member and Adult Associate Member, of the Group will be expected to adhere to this policy and sign a declaration of compliance.

### **2. Data Controller**

The 31st Itchen North (Amazon) Sea Scout Group Executive Committee is the Data Controller. This is made up of the Group Chair, Group Secretary, Group Treasurer, Group Scout Leader (GSL) and Deputy Group Scout Leader (DGSL) who are appointed at an Annual General Meeting.

### **3. Data Protection Officer**

This is the Group's representative for data protection duties, these duties are defined by the Data Controller.

### **4. Data Processor**

All Adult Members within the Group that have access to personal data are the Data Processors.

### **5. Data Subject**

Everyone involved within the Group that we collect personal data on, including Adult Members, Young People and Parents/Guardians, irrespective of age is deemed to be a Data Subject. The Data Subject is referred to as the Young Person or Adult Member in this policy.

### **6. Your Rights Under General Data Protection Regulation**

Your rights under GDPR and DPA 2018 are as follows:

- To be informed about how we collect and process your personal data. This policy provides this information.
- To request access to your personal data held by the Group. The Group will comply with any request according to current regulations.
- To have corrected any inaccurate or incomplete personal data. The Group requests all members to notify it of any changes to personal data and the Group will update information without delay.
- To have your personal data erased - "the right to be forgotten". The Group will comply with any request as far as possible.
- To restrict processing of personal data. The Group will comply with any request as far as possible.
- To move, copy or transfer your personal data. The Group will comply with any request as far as possible.
- To object to processing personal data. The Group will comply with any request as far as possible. However, some records are required to be retained for the formal administration of the Group and for safety/safeguarding purposes.

### **7. Personal Data Held For Under 18's**

Under the legislation, only those over the age of 13 are deemed to be Data Subjects. However, the Group treats the personal data of all Young People under the age of 18 in the same manner. Parental permission is always sought at the point of joining the Group. For those who join the Group before the age of 13, permission

given by the Parent/Guardian is deemed to continue as from the Young Person's 13th birthday, but the Data Subject (Young Person) then acquires the same rights as all other Data Subjects.

The following personal data will be processed for those under the age of 18:

- Name
- Age/date of birth
- Date of joining The Scouts
- Date of joining section e.g. Beavers, Cubs, Scouts or Explorers
- Address
- Email address for those Young People in the Scout and Explorer section
- Phone number for those Young People in the Scout and Explorer section
- Doctor's name, doctor's surgery address and doctor's phone number
- Photos and videos
- Parent/Guardian name
- Parent/Guardian address
- Parent/Guardian email address
- Parent/Guardian phone number
- Emergency contact name (If different to Parent/Guardian)
- Emergency contact address (If different to Parent/Guardian)
- Emergency contact email address (If different to Parent/Guardian)
- Emergency contact phone number (If different to Parent/Guardian)

The above personal data is only stored in Online Scout Manager (OSM) and we do not hold any other personal data for Young People within the Group. Parents/Guardians and Young People can log into OSM to access and edit their own personal data.

Financial information about bank accounts, payment of membership and activity fees, donations, the processing of gift aid and the maintenance of records are processed as required according to regulations. The Scouts allow the Group to process Young People's personal mobile numbers and email addresses of those members in the Scout and Explorer section. This is useful for general communication and especially during Scout events/activities such as expeditions, wide games and hikes. The Group will never contact a Young Person in a one to one situation.

Personal data for those Young People wishing to join the Group, but whom we do not have space for, will be held on a waiting list. They are not classed as members and the only information held is:

- Name
- Age/date of birth
- Date of joining the waiting list
- Parent/Guardian name
- Parent/Guardian email address
- Parent/Guardian phone number
- Parent/Guardian Address - Optional

## **8. Personal Data Held For Adult Members**

The personal membership profile of each Adult Member is kept on The Scouts Compass membership system. It is the responsibility of each Adult Member to ensure that they keep their own record up to date.

The following personal data will be processed for Adult Members:

- Name
- Age/date of birth
- Date of joining The Scouts
- Email address

Apart from Compass, the above personal data is stored only on OSM. No other personal data for Adult Members is held, apart from those members who are directly linked with a specific section e.g. Beavers, Cubs, Scouts or Explorers. The responsibility for managing Compass is the responsibility of The Scouts, and management of it locally is deemed to rest with Itchen North Scout District and Hampshire County Scouts.

Adult Members can log into OSM and The Scouts Compass membership system to access and edit their own personal data.

## 9. Sensitive Personal Data

The following sensitive personal data will be processed about all members:

- Gender
- Ethnicity
- Medical/health information
- Dietary information
- Disability

This is to enable inclusion and to complete The Scouts census. Relevant records will be kept for the management of safety, safeguarding and personnel.

We ask for consent for the following statements for those under the age of 18:

“I give consent for photos/videos of my child to be taken, stored and shared internally in the meeting location, local press, Scout websites and social media. I understand that if I later withdraw consent, previously published photos will not be able to be removed. (Regardless of this consent, the group/unit is not responsible for photos taken by other parties.)”

“I give consent for the storage and processing of sensitive personal information, including medical details (these are required for the safety of your child). I understand these may be shared with other Scout groups/organisers if/when my child moves sections or attends external events.”

## 10. Why We Process Personal Data

We process personal data by reason of the Data Subjects consent. This includes for the purposes of:

- The Scouts annual census, including statistical reporting on ethnicity and disability, which is relevant to inclusion.
- Any documentation forms that we send you to complete and return to the Group, including personal details forms, activity information forms and night's away information forms.

We process personal data for legal obligation. This includes for the purposes of:

- Maintaining safety and safeguarding records in compliance with The Scouts Policy Organisation and Rules (POR).
- Maintaining accounting records as required by HMRC.

We process personal data for the Group's legitimate interests. This includes processing for the purposes of:

- Administration of the Scout programme and activities.
- Governance.
- Safety and safeguarding.
- Fundraising and public/community relations.

## 11. How We Process Personal Data

The Group processes personal data using paper-based and electronic systems. It works with partner Data Processors including The Scouts, OSM, Flickr and Facebook. The Group has determined that partner organisations processing personal data on its behalf are compliant with GDPR and DPA 2018 as far as it can assess.

Personal data relating to members will always be stored on OSM as the Group's online data record platform. It will only be downloaded or used outside of OSM when absolutely necessary. Paper personal details forms are used to initially collect personal data of a new member joining the Group. Once this personal data is collected it is input into OSM and the paper record destroyed. We will share the personal data of Young People and their Parents/Guardians with The Scouts for the purpose of managing safeguarding cases via OSM.

## 12. Access To Personal Data

Access to personal data records is constantly reviewed and restricted to Adult Members who need access to undertake their appointed role within the Group. As a volunteer organisation it must be recognised that electronic records are accessed via devices not owned or controlled by the Group and which are the personal property of Adult Members within the Group.

All Adult Members within the Group who have been granted access to these electronic records are required to use security on their device in the form of the following:

- Strong and secure passwords.
- A firewall.
- Antivirus security.
- Data encryption.

Adult Members must ensure access to personal data is not possible by anyone else using their device or username and password. When an Adult Member disposes of their device any personal data on the hard drive must be fully erased.

In those limited situations where paper documentation is required to hold personal data, it should be stored securely under all circumstances e.g. filing cabinet or lockable box.

Adult Members with access to personal data are required to maintain that data in confidence and not to share it outside of a “need to know basis”.

All Adult Members with access to personal data will be trained in data protection by being required to complete The Scouts mandatory GDPR training module.

## 13. Data Retention And Disposal

The length of time for which personal data will be retained will depend on the nature of the data and the purpose for which the Group needs to retain it. Retention times for different administrative and legal purposes are as follows:

- Young People’s and Adult Members personal data - until the member leaves the Group.
- Attendance records for safeguarding purposes - indefinitely.
- Accident records - for 3 years after the accident occurred.
- Accounting purposes - for 6 years after the end of the relevant financial year.
- Notes and records from safeguarding investigations will be sent to The Scouts for retention and not kept locally.
- Adult Membership, involvement and training records will be kept on Compass and not in other forms. This will comply with the person’s membership and The Scouts policy.

Personal data, which is not required for any of the purposes listed above, will be maintained only for the period during which the member is an active member of the Group. Once a member leaves the Group all personal data will be disposed of securely.

Personal data will be transferred between sections when a member moves to a different section in the Group. If a member transfers to a different Scout Group, personal data will only be transferred to the new Group providing consent has been given by the Data Subject.

## 14. Photography, Videography And Social Media

The Group use photography and videos of members providing we have consent for the following:

- OSM - displayed on a member’s personal record
- Local press
- Group website
- 31<sup>st</sup> Itchen North (Amazon) Sea Scout Group Flickr account
- 31<sup>st</sup> Itchen North - Amazon Sea Scout Group Facebook Page
- 31<sup>st</sup> Itchen North (Amazon) Beavers Facebook Group

- 31<sup>st</sup> Itchen North (Amazon) Cubs Facebook Group
- 31<sup>st</sup> Itchen North (Amazon) Sea Scouts Facebook Group
- Amazon Explorer Sea Scout Unit (ESSU) Facebook Group

Our primary communication method with members is via email. Social media is used only as an addition and must not be used in isolation as a communication medium. Emails will always be sent using the OSM email facility. Where Group emails have to be sent from Adult Members personal email accounts Blind Carbon Copy (BCC) will always be used.

Photos and videos taken by Adult Members will be used by the Group in accordance with The Scouts guidelines. If a member later withdraws consent, previously published photos and videos are not capable of being removed. Regardless of this consent, the Group is not responsible for photos and videos taken by other parties.

Adult Members are not to engage in one to one conversations with Young People via chat facilities or instant messaging on social media. Adult Members are not to use their personal social media accounts to communicate with Young People, upload photos/videos or share any personal data.

With regard to use of the Group's social media accounts, the following will apply:

- Photos and videos should be shared as soon after the event as possible and then deleted from the Adult Member's device.
- Personal data, apart from a member's first name, must not be shared.
- Only information directly related to Scouting and our Group can be uploaded.
- Information relating to specific section events will only be posted on closed Facebook Groups; these will not be made publically available to safeguard members in that Group/section.
- Only Parents/Guardians and Young People who are currently a member of a section will be able to access/be a member of the specific Facebook Group for that section.

## **15. Subject Access Requests**

Any person who is the subject of personal data held by the Group may make a Subject Access Request by contacting the Data Controller. The request will be processed in accordance with current legislation and responded to within 30 days and will not be charged a fee for this. If the request is not possible or deemed excessive contact will be made within 30 days of making the Subject Access Request.

## **16. Data Breaches**

A data breach is:

- Inappropriate use of information.
- Loss of files both electronically and physically.
- Unauthorised access to information e.g. by hackers.

All personal data breaches, or suspected data breaches, must be reported immediately to the Data Controller for investigation. Where required these will be reported to the Information Commissioner's Office (ICO).

## **17. Communications**

All communication with Parents/Guardians and Young People is on an information only basis, governed by permissions granted via the personal details form. As no marketing or sales implications are involved in these communications the GDPR and DPA 2018 regulations on marketing preferences and permissions do not apply.

## **18. Registration With ICO**

The Group handles personal data only for the purposes of maintenance of its membership and is not required to register with the ICO or to pay the data protection fee.

## 19. Review Of This Policy

This policy will be reviewed annually or as any changes in regulations or best practice occurs. This policy is on the Group website and available from the 31st Itchen North (Amazon) Sea Scout Group Data Controller or the Data Protection Officer.

## 20. Policy Agreement

This policy was agreed by the 31st Itchen North (Amazon) Sea Scout Group Executive Committee on 8<sup>th</sup> November 2020.

All Adult Members of the 31st Itchen North (Amazon) Sea Scout Group who can access personal data of Young People and Adult Members are required to read the policy and confirm that they understand it and will comply with it, as per Appendix 1. In the case of any doubt they must obtain advice from the Data Controller or the Data Protection Officer prior to any further data processing about the matter in hand.

If you have any queries relating to this Policy or our use of your personal data, please contact the Data Controller or the Data Protection Officer.

**Policy Title:** 31st Itchen North (Amazon) Sea Scout Group Data Protection, Confidentiality and Privacy Policy

**Policy Author:** 31<sup>st</sup> Itchen North (Amazon) Sea Scout Group Executive Committee

**Policy Version:** 1.3

**Policy Written:** 8<sup>th</sup> November 2018

**Policy Review Date:** 8<sup>th</sup> November 2021

### Policy Change History:

Version	Date	Change
Version 1.1	17 <sup>th</sup> May 2019	Section 13: Addition of Accident records - for 3 years after the accident occurred. Addition of Young People's and Adult Members personal data - until the member leaves the Group. Removed - Governance matters - indefinitely. Section 14: Removal of Amazon Explorer Sea Scout Unit (ESSU) blog
Version 1.2	8 <sup>th</sup> November 2019	Section 8: Removal of Membership number, Disclosure and Barring Service (DBS) certificate number, DBS issue date and DBS expiry date
Version 1.3	8 <sup>th</sup> November 2020	Section 2: Amendment of Assistant Group Scout Leader (AGSL) to Deputy Group Scout Leader (DGSL) Section 7: Addition of Parent/Guardian Address - Optional Section 11: Addition of We will share the personal data of Young People and their Parents/Guardians with The Scouts for the purpose of managing safeguarding cases via OSM.

## Appendix 1

### Data Protection and Confidentiality Agreement

The 31st Itchen North (Amazon) Sea Scout Group Data Protection, Confidentiality and Privacy Policy were agreed by the 31st Itchen North (Amazon) Sea Scout Group Executive Committee on 8<sup>th</sup> November 2020.

All Adult Members of the 31st Itchen North (Amazon) Sea Scout Group who can access personal data of Young People and Adult Members are required to read the policy and confirm that they understand it and will comply with it. In the case of any doubt they must obtain advice from the Data Controller or the Data Protection Officer prior to any further data processing about the matter in hand.

- I have read and understood the Data Protection, Confidentiality and Privacy Policy.
- I agree to comply with the Data Protection, Confidentiality and Privacy Policy.
- I will only access or share information that is necessary and with those who need to know.
- I will only download personal data if it is required and absolutely essential.
- I will not retain personal data unless it is specifically part of my role.
- Any device I use holding personal data will be password protected and the hard drive encrypted.
- I will ensure that any device I have used is cleaned of all personal data before being disposed of.
- I will never communicate in a one to one situation with a Young Person through any means of communication medium.
- I agree to only sharing a member's first name, photos and videos on the Groups social media accounts, if consent has been sought for the Young Person.
- I agree to only publish information directly related to Scouting and the 31<sup>st</sup> Itchen North (Amazon) Sea Scout Group on the Groups social media accounts.

**Name**.....

**Signed**.....

**Date**.....

Agreement to this policy can be by handwritten or electronic signature.