

Data Privacy & Protection Policy

4th Worth Scouts

Our Privacy and Fair Processing Notice describes the categories of personal data we process, for what purposes and how we protect the personal data of members, volunteers, parents/guardians, and other individuals involved in our Scouting activities. We are committed to collecting and using such data fairly and in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Who are we?

Our Scout Group, 4th Worth Scouts, Charity number 305875, 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. We are incorporated by royal charter and are regulated as a member of The Scout Association, (see 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.

We are governed by our Trustee Board, who are elected every year at our Annual General Meeting, usually held in September. All members, volunteers and parents/guardians are entitled to attend the AGM.

We are based at Bycroft Way, Crawley RH10 1EX.

Data Controller

4th Worth Scouts is the data controller for the personal information we collect and process. The Trustee Board is responsible for ensuring that the Group complies with its data protection obligations.

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 (UK GDPR) and the Data Protection Act 2018.

How we gather personal information

The majority of the personal information we hold, is provided to us directly by yourself or by parents/legal guardians 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, personal information will normally be obtained from their parent/carer or legal guardian, although information may also be provided by the young person where appropriate.

How do we process your personal data?

We comply with our obligations under the "UK 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, or events that the group itself may be running or attending.

We use personal data for the following purposes: –

- To collect personal and medical information for the protection of that person whilst in the care of the Scout Group
- To collect religious information to respect a person's beliefs with regards to activities, food and holidays
- To enable us 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 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, activities and services running at 4th Worth Scouts.

Some of the information we process, including health and religious information, is special category data and will be processed and protected in accordance with the additional requirements of data protection legislation.

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

We will only process personal information where we have a lawful basis to do so under the UK GDPR. Depending on the circumstances, this may include legal obligation, legitimate interests, consent, contractual requirements or vital interests. Where special category data is processed, an appropriate additional condition will also be identified:

- We need to use the information to comply with our legal obligations
- We need to use the information to contact you, regarding meetings, events, collection of membership fees etc, (i.e., for the day to day running of the group)
- It is fair to use the personal information in your interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services within scouting.
- The processing is necessary for the persons 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.

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.

The Scouts Membership System

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

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.

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.
- Events coordination with event organisers.
- Award notifications/nominations

In the case of **Joining forms, Health and contact update forms**, this information is securely held by the Section Team Lead Volunteer or Group Lead Volunteer and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

Gift Aid

Gift Aid declaration and supporting records will be securely held by the Group Treasurer. These records will normally be retained for six years after the end of the accounting period to which they relate, in accordance with HMRC requirements.

Events

When off site, for example at an event or camp, where necessary to fulfil our legal obligations, we may use 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. We will minimise the use of paper to only what is required for the event/camp.

We will ensure:

- Transfer of paper is secure, such as physical hand to hand transfer or tracked post.
- Paper records will be securely destroyed when no longer required, for example by shredding.
- Always keeping the paper records secure, especially when in transit, by using:
 - A lockable briefcase.
 - A lockable filing cabinet if long term stored.
- If transferred to somebody, we will audit that they return them when the event is complete.

Awards

Sometimes we may nominate a member for a national award, (such as King's 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 tracked post.

CCTV

Our premises are monitored by CCTV for the purposes of security, crime prevention and detection, and the safety of members, volunteers, visitors, and the premises. CCTV images constitute personal data and are processed in accordance with UK data protection legislation.

CCTV recordings are normally retained for a limited period before being automatically overwritten, unless footage is required in connection with an incident, investigation, legal requirement or request relating to an individual's data protection rights. In these circumstances, relevant footage may be securely retained for longer.

Access to CCTV recordings is restricted to authorised persons. Images may be disclosed where there is a lawful reason to do so, for example to the police or other appropriate authorities. Individuals may have the right to request access to CCTV images in which they appear, subject to applicable data protection legislation.

Appropriate signs are displayed at the premises advising that CCTV is in operation.

Sharing and transferring personal Information

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

We may share your personal information with others outside our Scout Group where we need to meet or enforce a legal obligation. This may include, Crawley District Scouts, West Sussex County (known as West Sussex Scouts), The Scout Association and its insurance subsidiary "Unity", local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.

If you move from 4th Worth Scouts to another Scout Group or Explorer Scout Unit we will transfer your personal information to them.

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

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.). Where identifiable personal data is shared, we will ensure that there is an appropriate lawful basis for doing so and will seek consent where this is the appropriate lawful basis.

Third Party Data Processors

4th Worth Scouts uses the services of the following third-party data processors: –

- The Scouts Membership System 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 Ltd, Further information about its data protection and security arrangements is available on the Online Scout Manager Security and GDPR page. <https://www.onlinescoutmanager.co.uk/security.html>

Automated decision making

4th Worth Scouts does not have any automated decision-making systems.

Transfers outside the UK

Where personal information is transferred outside the UK, we will ensure that the transfer complies with the requirements of UK data protection legislation and that appropriate safeguards are in place.

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.

How long do we keep your personal data?

We will only retain personal data for as long as is necessary for the purposes for which it was collected or as required by law. In determining appropriate retention periods, the Group will have regard to current Scouts data retention guidance and any applicable legal or regulatory requirements.

Refer to <https://www.scouts.org.uk/about-us/policy/data-retention-policy/>

Your rights and your personal data

You are entitled to ask us, in writing, for a copy of the personal data we hold about you. This is known as a subject access request (SAR). In line with legislation, we will not charge a fee for this information and will respond to your request within one calendar month. This is unless this is not possible or deemed excessive, in which case we will contact you within one month of making the SAR to state the reason for the extension and/or the charging of an appropriate fee.

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 UK 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** – You can ask us to share with you the data we have about you.
- **The right to rectification** – You can ask us to correct your data if it's inaccurate or incomplete.
- **The right to erasure** – 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 with the law, you can restrict any further use of your data until the problem is resolved.
- **The right to data portability** – If you ask us, we will share your data with you in a way that can be read digitally
- **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 decisions are being made about you based entirely on automated processes rather than a human input.

Please contact your child(ren)'s Section Team Lead Volunteer, or our Group Lead Volunteer for more information, in the first instance.

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.

Contact Details

For queries or complaints, or to exercise your data protection rights, including making a Subject Access Request, please contact the Group Lead Volunteer in the first instance:

Group Lead Volunteer
4th Worth Scouts
Bycroft Way
Crawley
RH10 1EX

Email: gsl@4thworthscouts.org.uk

You can contact the Information Commissioner's Office at www.ico.org.uk or by telephone on 0303 123 1113