

MEDWAY TOWNS DISTRICT SCOUT COUNCIL

Registered Charity 303434

PRIVACY POLICY

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 General Data Protection Regulation (GDPR) as enacted by The Data Protection Act 2018.

1. Who are we?

Medway Towns District Scout Council, known as Medway Towns Scouts, is a registered youth charity (Charity No. 303434), responsible for the growth and development of Scouting in the Rochester, Chatham and Strood areas of Medway Unitary Authority, including Hoo and the Grain peninsula, Cliffe, Walderslade, Lordswood, Luton, Cuxton and Halling.

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 UK The Scout Association, (Registered Charity No. 306101), see www.scouts.org.uk for more information.

In September each year we hold an annual general meeting to elect members and approve nominated members of our District Executive Committee (our trustees).

The District does not have its own headquarters. Much of our activity is based at Buckmore Park Scout Camp Site, Maidstone Road, Chatham, Kent ME5 9QG, which is owned by the District. However, there is no administration at Buckmore Park, and post is handled by trustees at their home addresses.

Our District 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.

2. Scope

This document is primarily concerned with data held for adults involved in Scouting in Medway, including:

- Warranted Leaders who hold District Appointments
- Trustees of Medway Towns District Scout Council
- Members of Medway Towns Scout Network
- Members of Medway Active Support Team (MAST)

The policy also covers

- Warranted Leaders who hold appointments with groups in the district
- Trustees of groups within the district
- Other adults who hold appointments with groups within the district, such as committee members, skills instructors and occasional helpers

However, all groups within the district must have their own security policy covering people within these categories as well as young people in these groups.

The policy, in general, does not cover young people, except as specified in sections 4, 5 and 16

Specifically, whilst Explorer Scouts are technically part of the district, because of the way Medway Towns provides Explorer Scouting, the Security Policy of the Group with which each unit has a partnership agreement will document the main policy relating to members of that unit.

The exception to this is Explorer Scout Young Leaders who attend modules run by the District's Young Leader Unit. Personal information, including name, date of birth, contact details, emergency phone contact, group and section with which they are a young leader and record of modules attended are recorded for members.

3. 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 District (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").

4. How we gather personal information

The majority of the personal information we hold is provided to us directly by yourself or by parents / legal guardian in either paper form, and in the case of our adult member, via Compass, our online membership systems and 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. Personal information about young persons is generally only held by the District in regard to their attendance at events organised or run by the District, and is securely destroyed after the event (but see paragraph 14 for exceptions)

The use of young person's personal data by groups within the District is outside the scope of the District's policy, and for this information you must refer to the group's information policy

5. 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, next of kin (adult members) parents and guardians (young people), to inform them of meetings, events that the District may be running or attending.

We use personal data for the following purposes: -

- 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 promote the interests of Scouting across the District
- 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 relating to your membership.

We use special category 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 District
- we collect religious data to respect a person's beliefs with regards to activities, food and holidays
- we collect ethnic origin information for statistical analysis only

6. What is the legal basis for processing 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:

1. We need to use the information to comply with our legal obligations
2. We need to use the information to contact with you, regarding meetings, events, collection of membership fee's etc., (i.e. for the day to day running of the District)
3. 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.
4. *The processing is necessary for the person's legitimate interests or the legitimate interests of our Scout District unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.*

7. What is the legal basis for processing special category personal data?

We will only store special category personal data with your explicit consent, and for the reasons specified in section 5

We will not record any other special category data (Race, politics, trade union membership, genetics, biometrics, sex life or sexual orientation)

8. How we store personal data

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We generally store our adult members' personal information in a secure digital online database system, 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.

9. Printed records and event data

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

- New adults (adult Information Form)
- References
- I.D. checking form
- Award notifications/nominations

In the case of adult information forms and I.D. checking forms, this information is securely held by the Appointments Secretary and transferred to Compass and Atlantic Data as soon as possible before the paper forms is destroyed.

Events

As a member of Medway Towns Scouts it is hoped you will take up the opportunity to attend events and camps. Where 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.

We will ensure:

1. Transfer of paper is secure, such as physical hand to hand transfer or registered post.
2. Printouts or paper forms are securely destroyed after use.
3. Secure destruction will be through a shredding machine.
4. Always keeping the paper records secure, especially when in transit, by using:
 1. A lockable brief case.
 2. A lockable filing cabinet if long term stored.
5. 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.

10. Sharing and transferring personal Information

We will only normally share personal information within our Scout District with members of the District team and, if appropriate, executive members.

We will however share your personal information with others outside our Scout District where we need meet or enforce a legal obligation, this may include your relevant Scout Group, Kent County Scout Council, The Scout Association and its insurance subsidiary "Unity", Atlantic Data Ltd (who process our DBS checks), local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.

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

Sometimes we may nominate a member for a national award, (such as Good Service or St George's Day Award), such nominations would require us to provide information on your service to scouting to The Scout Association and this may include some of your personal and sensitive details.

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.

11. District Website - www.medwaytowns.org.uk/

Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. When you access our website we will place small amounts of information on the device you are using. These small files cannot be used to identify you personally.

Tracking cookies

Tracking cookies allow us to measure how many people access our website, which pages they visit and how they find the site. We use this information to maintain and improve the website, for example by making changes to improve performance in search results. The tracking cookies we use are provided by Google Analytics, a web analytics service provided by Google, Inc. To opt out of being tracked by Google Analytics across all websites visit: <http://tools.google.com/dlpage/gaoptout>

12. Third Party Data Processors

Medway Towns Scouts, 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 adult members and parents who have undergone a Disclosure and Barring Service (DBS) check (www.scouts.org.uk/privacy-policy).
- **thescouts.disclosures.co.uk:** We use [thescouts.disclosures.co.uk](https://thescouts.disclosures.co.uk/secure/PrivacyStatement.pdf) to administer Disclosure and Barring Service criminal records checks (<https://thescouts.disclosures.co.uk/secure/PrivacyStatement.pdf>).
- **Facebook:** We do not capture or store any of the information freely provided by data subjects on Facebook.
We do not use Facebook to make unsolicited contact with users who have visited the page.

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). Or Cyber Essentials/Essentials Plus

13. Automated decision making

Medway Towns Scouts does not have any automated decision-making systems in place.

14. Transfers outside the UK

Medway Towns Scouts 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.

15. 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.

16. How long do we keep your personal data?

We will retain your personal information as follows:

Data Description	Retention Policy
Information about adult members	Retained whilst a current member
	A subset of data is retained when an adult leaves Scouting (See The UK Scout Association's archive and retention policy at https://www.gilwellpark.co.uk/sites/default/files/inline-files/SCOUTS-data-protection_0.pdf)
Information about safeguarding incidents	Indefinitely
Information about accidents and near misses	5 years after end of investigation
Information about attendees at our events	Destroyed after event, unless there is a medical incident, and then kept for 3 years
Information about attendees at adult training events	Destroyed 1 year after the event, unless there is a medical incident, and then kept for 3 years. Adult training records are updated on Compass
Information about general enquiries	1 year after enquiry has been answered or referred on
Information about youth joining enquirers	Kept for statistical analysis. Destroyed 3 years after enquiry has been answered
Information about adult volunteering enquirers	Kept for statistical analysis. Destroyed 3 years after enquiry has been answered
Information about complainants	3 years after enquiry has been answered
Information about people registered to our internal mailing lists	Indefinitely, unless the individual requests removal or leaves the movement
Information about people registered to our external mailing lists	Indefinitely, unless the individual requests removal
Explorer Scout Young Leaders	Until they cease to hold an active role in Scouting

17. 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 District.
- **The right to access your personal data** – you can ask us to share with you the data they have about you!
- **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 and Compass.
- **The right to erasure** – this means that you have the right to request that we delete any personal data they 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 data lead at treasurer@medwaytownsdistrictscouts.org.uk 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.

18. Your rights and your special category personal data

In addition to your rights as set out above for personal data, for special category personal data, you have the additional right to withdraw consent for us to store that data.

Should you chose to do so, this will not affect your role within Scouting.

19. 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.

20. Updates or changes to the privacy policy

We reserve the right to make changes to this Privacy Policy.

21. Disclosure of data by order of a Court and Security

We reserve the right to communicate personal information as we hold to third parties who are empowered by regulation, statute or order of a court.

22. Contact Details

If you want to contact us to raise any questions about this privacy statement, or any general matters relating to the way we process and hold data, you can contact us using this email address: treasurer@medwaytownsdistrictscouts.org.uk

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.

Version Control

<u>Version Number</u>	<u>Date</u>	<u>Summary of Changes</u>	<u>Author/Editor</u>
D.1	16/6/18	Initial draft	CSJ
D.1.01	17/6/18	<ul style="list-style-type: none"> • Insert missing text regarding AGMs (P1) • Remove spurious reference to London boroughs (P3) 	CSJ
D.1.02	23/6/18	Add references to data held for ESYLs (Sections 2 and 16) Information re use of Facebook added (Section 12) Version control added	CSJ
D1.03	30/8/18	Information re website use of cookies and tracking cookies added (Section 11) Repagination	CSJ
V1.00	5/9/18	Approved for adoption by District Executive 3/9/18	CSJ