

# Data Protection Policy

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## **Who is this for and what does it apply to?**

The current Data Protection (DP) regulations were updated in May 2018 to be consistent with European legislation known as the General Data Protection Regulation (GDPR). Data Protection regulation applies to all organisations that hold any information that identifies living people.

This document is for all adult members of Chandler's Ford Scout District who are responsible for the processing of personal data and should be read in conjunction with the Scout Association's [Data Protection Policy](#)

In Scouting, DP applies to the lists of young people, adults and any other people recorded in a structured way for their future contact. It applies to the use of the Compass membership system from recruitment onwards and Online Scout Manager (OSM). It applies to information gathered from the website, to activity information forms and fundraising list information. It does not apply to incidental naming of people in, for example, minutes of meetings or action lists.

Chandler's Ford Scout District processes personal data using paper and electronic systems. It works with partner data processors including The Scout Association, OSM, eDofE, banking service providers, Google, Facebook, Dropbox and other similar providers. Chandler's Ford Scout District has determined that the partner organisations processing data on its behalf are compliant with GDPR as far as it can assess.

## **Commitment**

Chandler's Ford Scout District is committed to fully complying with the DP rules. This means that every adult (leaders, administrators, honorary officers, executive members and other volunteers) involved in Chandler's Ford Scout District will observe this Policy.

## **Formal Contact**

Chandler's Ford Scout District Executive is the Data Controller. The contact address is District Chair.

## **The Legal Basis of our Data Processing**

Chandler's Ford Scout District is an unincorporated educational children's charity run by volunteers. The young people it serves are members or waiting to join. Adults in leader, trustee and supporter roles are either members or associate members.

To achieve the purposes of the charity we process data ***for our legitimate interests***

This includes processing for the purposes of

- Administration of the Scouting Programme and Activities
- Governance
- Safety and safeguarding
- Fundraising and Public /Community Relations

This includes processing by holding paper and electronic records, processing with the facilities or our data processing partners and sending communications by paper and electronic means.

We process data ***for legal reasons***

This includes for the purposes of

- maintaining safety and safeguarding records in compliance with the Scout Association's Policy Organisation and Rules (POR)
- maintaining accounting records as required by HMRC and charity regulation

We process data by reason of ***data subjects' consent***

This includes for the purposes of

- Statistical reporting about inclusion, relating religious belief, ethnicity and disability

## **Special Categories of Personal Data**

Data will be processed about members' and adult helpers' Ethnicity, Health, Disability and Religious Belief to enable inclusion. Information about criminal records will be processed to inform recruitment decisions but will not be kept. (disclosure of all criminal convictions and cautions and the provision of an enhanced certificate from the Disclosure and Barring Service is required for all adults in relevant roles, this being in compliance with the relevant legislation about filtering and rehabilitation of offenders)

The personal data of adult members will include full name and contact details, date of birth and age, records of service and training. Records of service will include roles, training and role reviews. Relevant records will be kept for the management of Safety, Safeguarding and Personnel.

Financial information about bank accounts, payment of membership and activity fees, donations the processing of Gift Aid and the maintenance of records as required by regulations.

## **Sharing of Personal Data**

Subject to Data Protection regulations the Chandler's Ford Scout District may share personal data as relevant, with The Scout Association, the Scout County and other Scout Groups to enable provision of the Scout programme, activities, training opportunities, administration and promotion.

It would be shared to comply with legal requirements when necessary to others when required. This includes medical services.

It would be shared when relevant for the good administration of the charity and security of our processes.

It will be processed by partner data processors including cloud-based services for the good administration of the Chandler's Ford Scout District and the achievement of its charitable purposes.

Personal data may be transferred outside the UK and European Economic Area (EEA) through the use of cloud computing systems.

## **Confidentiality**

Chandler's Ford Scout District is an organisation with approximately 120 adult members with various levels of access to groups of Young People and Adult's information. All persons with access to personal data are required to maintain that personal data in confidence and not to share it outside a "need to know" basis. All persons with access to personal data are required to agree to a Confidentiality and Data Protection statement. Anyone storing personal information is required to only use devices that are physically secured within their own property, and any mobile devices such as laptops or mobile phone are required to be password protected and the data encrypted.

## **Safeguarding Partnership**

The Chandler's Ford Scout District is a member of The Scout Association and complies with its Policy, Organisation and Rules (POR). POR includes the safeguarding processes involving recruitment and safeguarding investigations. Personal information will be passed to the Scout Association for their processes with regard to leader support and safeguarding. Information will be passed to the Police when there is a relevant matter.

## **Subject Access**

Any person who is the subject of personal data held by the District may make a subject access request by contacting the Data Controller. The request will be processed in accordance with current regulations.

Adult members may access their personal data by logging into Compass and are encouraged to keep this up-to-date themselves.

Parents and Young People can log into OSM, where used, to access and edit their OSM data or contact their section leader to review the data held and to keep this up-to-date.

## **Not registered with ICO**

As a charity, the Chandler's Ford Scout District handles personal data only for the purposes of maintenance of membership and donors and is not required to notify the Information Commissioners Office (ICO) or to pay the Data Protection fee.

## **Rights under Data Protection Regulation**

Adults on whom data is held and the parents and guardians of young people on whom data is held have the right:

- **To be informed** about how we process their personal data: this Data Protection and Privacy Policy seeks to provide that information,
- **To have any erroneous personal data corrected:** the Chandler's Ford Scout District requests that all members to notify any relevant changes and will update the information held without delay,
- **To object to processing:** the Chandler's Ford Scout District will comply with any request as far as possible; some records are maintained for the formal administration of the charity, for safety and for safeguarding purposes when retention of records will be required,
- **To restrict processing:** the Chandler's Ford Scout District will comply with any request as far as possible,
- **To have your personal data erased:** the Chandler's Ford Scout District will comply with any such request as far as possible,
- **To request access:** the Chandler's Ford Scout District will comply with current regulations
- **To move, copy or transfer** their personal data: the Chandler's Ford Scout District will comply with such a request as far as possible acknowledging that adult member records are included in Compass. The transfer of young peoples' data in OSM may be possible.

## **Questions about Data Protection or the use of Personal Data**

Any questions or comments about data protection or this policy, notwithstanding your rights above, should be addressed to the Data Controller.

## **Adult Members Personal records**

The personal membership profile of each member is kept on Compass. It is the responsibility of each member to ensure that they keep their own record up to date. If anyone has difficulty in accessing their membership record then they should ask their line manager for assistance. The Scout Association Information Centre (0345 300 1818) may also be able to help.

## **Internal and Other Directories**

The compilation of any directory must have the approval of the Executive Committee. Directories must only contain the information that is held for legitimate interests and is relevant to the purpose of the directory and data that is specifically consented to include. The request for consent must include information about access to or distribution of the directory. The directory must be kept-up to date by a named person.

## **Programme, Activity and Training Registration**

Personnel will use appropriate and secure methods to gather information for registration. Only information that is necessary for the purpose will be requested.

Information may be gathered by paper or online forms. A data protection statement will be included in the form stating the use of the data and identifying any sharing of that data.

Activity registration data will often form part of relevant training and safeguarding information and will only be kept for the relevant time scale.

## **Retention of records**

Records will be retained for the good administration of the Chandler's Ford Scout District. Further details are provided in the Chandler's Ford Scout District – Data Retention Policy

## **Consent for young people**

Consent for young people (under 18's) to participate in activities and to receive communications will require parental / guardian consent.

## **Consent to electronic mailings - unsubscribe**

Mailings may be sent for notification of events, administration and governance. Anyone who wishes not to receive such mailings, providing it is not a requirement, may ask to be excluded from future mailings.

## **Communication of this Policy**

This policy should be made available to anyone who requests it.

## **Review of this Policy**

This Policy will be reviewed every 3 years or as significant changes in regulations or best practice occur whichever is the soonest.

## **Agreed**

This Policy was agreed by the Chandler's Ford Scout District Executive on 9<sup>th</sup> January 2019

Signed: ..... Date: .....  
Chairman

Signed: ..... Date: .....  
Secretary

# Data Retention Policy

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Personal information should be retained according to the following policy

Data Process	Adult / Young Person	Data Type	Retention	Justification
Adult information form	Adult	Sensitive data	12 months or until approval checks and “Getting started” training is complete, whichever is shortest	Required to assist in the appointment process, before data entered into compass
Adult identity checking form	Adult	Sensitive data	Until ID data has been submitted to DBS/PVG and the vetting process is complete	Required to verify that the identity has been checked.
Attendance register	YP	Personal data	4 years	Required to complete annual registration review and to provide any support required in relation to training or awards
Events & Activities	Adult & YP	Sensitive data	2 months after event	Required for enquiries on the event and responding to incidents
Gift Aid forms	Adult	Sensitive data	6 years after donation	HMRC Tax audit
Incident with Medical intervention	Adult & YP	Sensitive data	1 Year	Legal claims raised against the incident
Joining enquires and forms	YP	Sensitive data	1 year after enquiry or until the young person is added to a Waiting List, whichever is shorter	Required for placing individual on a waiting list for a place
Waiting Lists	YP	Sensitive data	1 year after reaching the joining age or until the young person joins, whichever is shorter	To manage effective recruitment
Joining forms	Adult	Sensitive data	Within 3 months of the recruitment process being completed	Required for enquiries on membership
Safeguarding	N/A	N/A	No retention	see Note 1.
Training records	Adult & YP	Sensitive data	2 Years after the person leaves	Required for any re-joins to connect them back to their training records

## *Note1.*

The retention of safeguarding data is handled by the Scouts UK headquarters as part of the safeguarding procedures and no data should be retained locally. This should be in line with the Scouts ‘Young People First’; District Commissioner Procedures.