

# Data Protection Policy

1<sup>st</sup> Rhu Scout Group



## Purpose of this Data protection policy and what it covers.

This policy sets out 1<sup>st</sup> Rhu Scout Group's approach to protecting personal data and explains your rights in relation to how we may process personal data. We provide more detail in respect of how we process and protect your data below. This policy describes the personal details collected, held and processed relating to current, future and ex-members and their parents/carers.

## Who we are.

1<sup>st</sup> Rhu Scout Group are a registered charity with the Scottish Charity Register (Charity Number SC18752). Our purpose is to actively engage and support young people in their personal development, empowering them to make a positive contribution to society.

1<sup>st</sup> Rhu Scout Group ("We" in this document) is the Data Controller. We are located at; 1<sup>st</sup> Rhu Scouts, Scout Hall, Cumberland Road, Rhu, Argyll & Bute, G84 8SA.

If you have any queries about anything set out in this policy or about your own rights, please write to the Data Protection Officer at the above address or via email at [data.protection@rhuscouts.org.uk](mailto:data.protection@rhuscouts.org.uk)

## What is personal data.

Personal data means any information about an identified or identifiable person. For example, an individual's home address, personal (home and mobile) phone numbers and email addresses, occupation, and so on can all be defined as personal data.

Some categories of personal data are recognised as being particularly sensitive ("special category data"). These include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic and biometric information, and data concerning a person's sex life or sexual orientation.

## Your Rights.

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.

You can view and edit your personal information directly on our online membership systems Online Scout Manager (for Young People and Adults) and Compass (for Adult Members only). If you have any problems, please contact your section leader for more information, in the first instance.

Under GDPR you have a number of 'rights' when it comes to your data, including:

- **The right to be informed** - about how personal data is processed: this Data Protection and Privacy Policy seeks to provide that information.
- **The right to access your personal data** – you can ask to view any personal information held about you.
- **The right to rectification** – this means you can update your data if it's inaccurate or somethings missing.
- **The right to erasure** - this means that you have the right to request that we delete any personal data they have about you.

- **The right to restrict processing** – if you think there’s something wrong with the data being held about you, or you aren’t sure a company is 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, we will 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 other Scout groups, companies, etc.
- **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.

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.

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

The majority of the personal information we hold on you, is provided to us directly by yourself or by parents / legal guardian in either paper form or via our online membership systems, website contact forms eg. General contacts, hall booking, events booking, etc and in the case of an adult member, data may also be provided by third party reference agencies, such as Disclosure Scotland.

Where a member is under the age of 13, this information will only be obtained from a parent / guardian and cannot be provided by the young person, however we will accept and potentially record any personal information, such as about any ongoing medical treatment from any member no matter their age.

## **How we use your personal information.**

We collect your personal and medical information for the protection and identification of that person whilst in the care of the Scout Group.

The collection of a person’s religion data is necessary to respect their beliefs with regards to activities, food, and holidays.

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

## **Our legal basis for using your personal information.**

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 legitimately to contact with you, regarding meetings, events, collection of membership fee's etc, i.e. for the day to day running of the group.
- c) 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.

## **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.

## **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 1st Rhu Scout Group where we need to meet or enforce a legal obligation, this may include organisers of events and camps the member is attending, such as Dunbartonshire District Scouts, West Region Scouts, Scouts Scotland etc so they may fulfil any 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.

We may also share a member's personal detail with The Scout Association and its insurance subsidiary "Unity", local authority services and law enforcement, along with any other insurance company 1st Rhu Scout Group has contracted to provide services, we will only share your personal information to the extent needed for those purposes.

If you move from 1st Rhu scout Group to another Scout group or Explorer group, we will transfer your personal information to them.

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 a Scouting or Duke of Edinburgh award) such nominations would require we provide contact details to that organisation.

## **Third Party Processors.**

1st Rhu Scout Group employs the services of the following third-party data processors: -

The Scout Association via its membership system "Compass" which is used to record the personal information of leaders, adults and parents who have undergone a Disclosure Scotland PVG check.

Unity Insurance (The Scout Association Insurance company)

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>

Microsoft 365 is used for emails from rhuscouts.org.uk accounts and used as a secure store on the cloud-based system. More information about Microsoft's Privacy is available at <https://privacy.microsoft.com/en-gb/privacystatement>

Online Scout Manager Reporting is used in conjunction with OSM to allow leaders to create editable and printable reports from information in OSM about badges, attendance, records, etc. (OSMR does not store or hold data from Online Scout Manager)

## How long we keep your personal information for.

We may keep information for different periods of time for different purposes as required by law or best practice. We make sure we store this in line with our Data Retention Policy.

As far as membership information is concerned, to make sure of continuity (for example if you leave and then re-join) and to carry out our legal responsibilities relating to safeguarding young people, we keep your membership information throughout your membership and after it ends, and we make sure we store it securely.

## Automated decision making.

1st Rhu Scout Group does not have any automated decision-making systems.

## Transfers outside the United Kingdom.

1st Rhu Scout Group 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.

## Data Storage.

1<sup>st</sup> Rhu Scout Group is committed to the protection of your personal information. Access to the data is restricted and controlled by the use of usernames and passwords.

**Compass:** - 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:** - is an online membership system run by Online Youth Manager Ltd, this is a secure membership database where we store the personal information of adult volunteers and youth members for the day to day running of the group.

**Microsoft 365:** - is a secure cloud-based storage system and is used as our internal and external communications platform, for example leaders will have access to a range of Microsoft products and access to a rhuscouts.org.uk email address. Details of individuals may be shared between adult volunteers using this platform. We may also ask you to provide us information directly using specific forms/documents held within this platform.

**CCTV:** - our building is monitored using a CCTV system. Information on this system is stored for the purpose of building security and member safety and is automatically overwritten on a rolling basis. In the event of a security issue images of you may be passed to the local authorities to support legal proceedings.

**Our website:** - is our portal to the world and is also our online merchandise store. We will collect information on this site to enable us to process online orders. We will also collect anonymised cookie data to aid in the development of our website. We will receive information such as joining requests which will then be transferred to our membership database.

## Printed Records & Event Data.

Paper may still be used within 1st Rhu Scout Group 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 leader or waiting list manager and if applicable be transferred to our secure digital systems as soon as possible before the paper form is destroyed.

## Gift Aid.

Declarations will be scanned and uploaded to Microsoft 365 to aid in the collection of Gift Aid for termly membership fees. We have a legal obligation to retain this information for 7 years after the last claim.

## Events.

As a member of 1st Rhu Scout Group it is hoped you will take up the opportunity to attend events and camps. On such events in order 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:

- Transfer of paper is secure, such as physical hand to hand transfer or post.
- Paper forms are securely destroyed after use.
- Secure destruction will be through a shredding machine or securely burned.
- Always keeping the paper records secure.
- If transferred to somebody, we will check that they return them when the event is complete.
- Files will be locked away if at all possible.

## 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. Additionally, where an award is being recommended, we may not notify the recipient in advance in accordance with The Scouts Rules.

## **Photography.**

The position 1<sup>st</sup> Rhu Scout Group is currently on for photography is as follows: –

Photographs/images (which can be classed as personal information) of adults or young people may be taken during activities and be used within a Scouting context and in particular publicity material for example scouting publications and the media. Images may be published to official Scout websites and scouting affiliated social media but will never identify individuals in line with The Scout Association guidelines.

We cannot ask for explicit consent “Yes/No”, as consent presumes that it can be revoked, as is your right to do so under the GDPR regulations.

If we publish a photograph or image in any public forum, we no longer have control over that photograph, as it can be downloaded, screenshot, re-photographed and shared by others, stored in systems not related or controlled by the 1st Rhu Scout Group.

Under GDPR consent is invalid if people cannot easily withdraw consent, which would be the case with publishing to any publicly accessible system, therefore if you do not wish your son/daughter to appear in these then please confirm, in writing, to the Group Scout Leader, and we will not publish any photographs of you or your child on a public forum such as social media from that point forward, we will be unable to confirm full removal of images and photographs from the historical record online or otherwise stored.

Please note that we cannot control or stop images being taken by other individuals, parents or organisations not connected with the 1<sup>st</sup> Rhu Scout Group.

The 1st Rhu Scout Group may store an image of you or your child on the Online Scout Manager (OSM) membership database for the purposes of identification, alongside and linked to the personal information, access to this image is limited to the leaders and authorised users of OSM as is the rest of the personal information.

## **Data Sharing Agreement between The Scout Association & Online Scout Manager.**

OSM (Our Membership Database) has entered into a collaborative partnership agreement with The Scout Association (TSA) a charity whose aims are to engage and support young people in their personal development and empowering them to make a positive contribution.

The 1st purpose of the Data Sharing Agreement is to allow The Scout Association to gain important real time insights into Scouting nationally that can be used to improve the support provided for local groups and increase external funding of Scouting. This will not involve any personally identifiable data.

The 2nd purpose of the Data Sharing Agreement is to allow the protection of children more effectively by helping our Safeguarding team access critical contact information faster in exceptional circumstances, in a controlled and transparent manner. This data is only accessible by the safeguarding team, used to protect children. Their access will be logged within OSM's audit trail for Scout Group Admins to see.

The safeguarding team may access specific personal details (name/DOB/contact details) of members and their parents/guardians in OSM as a last resort if the information cannot be obtained through the usual channels or in the event of an emergency.

View the TSA (The Scout Association) Data Protection Policy here: [The Scouts Data Protection Policy](#).

## How we provide this privacy notice.

A link to this website page is provided to those whose data is being processed by us. A printed version is also available on request. We may from time to time make minor changes to this policy. We will notify members either via email, social media, etc when we make any substantial or significant changes to the policy.

## Subject Access Requests.

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 the month of making the SAR to state the reason for the extension and/or the charging of an appropriate fee.

## Further information and contacts.

To exercise all relevant rights, queries of complaints please in the first instance contact 1<sup>st</sup> Rhu Scout Group.

Data Protection Officer: -

Email to [data.protection@rhuscouts.org.uk](mailto:data.protection@rhuscouts.org.uk) or write to 1<sup>st</sup> Rhu Scouts, Scout Hall, Cumberland Road, Rhu, Argyll & Bute, G84 8SA.

In situations where you feel 1<sup>st</sup> Rhu Scouts has not handled your personal data query/complaint appropriately you have the right to inform the Information Commissioners Office.

[Contact the Information Commissioner's Office](#)

Version:
2
Date of last review:
November 2021
Approved by:
Executive Committee
Next review:
This policy will be reviewed periodically as any changes in regulations or best practice occur; this will be no more than every 3 years.