

Scouts The Malverns Data Protection Policy

December 2023
Registered Charity Number: 1030019



Introduction and Background

Your privacy is important to us, and we want to hold and use your personal data only in a way which is appropriate to your involvement with Scouting and which is in line with UK law on data protection. The Policy Organisation and Rules (POR) of The Scout Association contains the Privacy and Data Protection Policy of Scouting in Chapter 2 (Key Policies) and we fully comply with this and follow The Scout Association's issued guidance.

1. Your personal data – what is it?

Personal data relates to an individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in 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").

Every member of the District is deemed to be a "data subject", irrespective of age. The data subject is determined to be the member of the District rather than the parent/guardian of that District member. However, we will be holding some measure of personal data for the parent/guardian (e.g. name and contact details). We undertake to hold this data in the same secure manner and use this data only in the same manner for Scouting purposes as outlined within this document.

2. Who are we?

The District Trustee Board of The Malverns Scout District (also known as "Scouts The Malverns" or "District") are the data controllers (contact details below). This means it is the District Trustee Board who decide how any of your personal data that is held is used and for what purposes. Specifically, the District Chair is deemed to be the "data controller" on behalf of the District.

3. How do we process your personal data?

The District Trustee Board of Scouts The Malverns fully comply with their obligations under "GDPR" by keeping personal data up to date; by storing, processing 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 specifically use your personal data for the following purposes:

- Enrolment forms
- Programme and event forms for Scouts The Malverns
- Electronic registers

- Safety records
- Safeguarding records
- Training records
- Programme records
- Activity records
- Event recording
- Communicating with you regarding Scouting

To maintain records, we use:

- The Scout Association's Compass adult membership system (soon to be replaced by a new digital system); responsibility for which rest with The Scout Association. The Compass system is not used for data for those under the age of 18 and is for all adult volunteers records only. It contains personal information (including names, addresses, contact information, dates of birth, roles and training) for each adult in the District. Access to Compass is controlled by The Scout Association and for the District restricted to the hierarchy of District roles. Adult members are responsible for maintaining their own data on Compass, e.g. name, address, contact details either directly or via a nominated individual. All membership data should be checked as regularly as possible to ensure it is correct/factually accurate and must, in any event, be checked on an annual basis.
- The Online Scout Manager (OSM) system. This is primarily used for young people's records (up to the age of 18) and principally contains programme records. It also holds names, emergency telephone numbers and dates of birth. It can also hold information about leaders and helpers for activities and events. Access to OSM is restricted to members of the Leadership team only. This is used a quick reference point for emergency telephone numbers so access is granted to a wider set of individual Leaders but the breadth of personal information held within the system is restricted.
- Use of Local District Systems to hold and process data for local purposes including events, activities and communications. These will evolve and change over time, but will always been checked first to ensure that they offer adequate security and their use will be recorded by the District. Typically, they may include:
 - Office 365 for things like permits, personal, medical and emergency details to provide information on the planning of scouting activities, safeguarding and security of members
 - Eventbrite for personal details when booking on to events
 - Doodle for personal contact details when attempting to organise events
 - Dropbox and OneNote for programme data with names
 - Customer/Client Relationship Management (CRM) systems for contact details to deploy relevant communications to member
 - MailChimp and other bulk e-mailing systems for contact details to deploy relevant communications to member
 - Hard copy / paper as appropriate.

4. What is the legal basis for processing your personal data?

- As a member of Scouts The Malverns, each individual (young person and adult) agrees to the District holding and using their information for the purposes of Scouting.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by the District (or by some person or organisation on their behalf once the District are satisfied that adequate data protection is in place) provided:
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes, e.g. parents / guardians of young people); and
 - there is no disclosure to a third party without consent.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of Scouting for purposes connected with Scouting. We will only share your data with third parties outside of UK Scouting or outside of the UK with your consent.

6. How long do we keep your personal data?

We hold all personal data in accordance with the guidance provided by The Scout Association and industry best practice for data privacy.

We review our data security arrangements on a regular basis (typically as systems and processes change) and at least annually. We maintain or record of who, where and how all personally identifiable information is retained and processed within the District.

Specifically, we retain information regarding members' data while it is still current and then securely destroy the information when it is no longer relevant:

- For events, we securely destroy all personal information after the event is completed (unless there are any relevant residual legal issues such as health, safety and safeguarding).
- For young peoples (under 18) membership records, we securely destroy these within a year of the individual leaving Scouting.
- Adult membership records are national records and held on Compass (or its replacement digital system) subject to The Scout Association's retention policy.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which the District hold about you.
- The right to request that the District correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for the District / Scouting to retain such data.

- The right to cease to be a member of Scouts The Malverns and then withdraw your consent to the processing at any time.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Policy, 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.

9. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact your local Unit Leader / lead Volunteer. If they cannot provide an answer or if they have further queries, contact should be made with the District Chair as our data controller (e-mail chair@malvernscouts.org.uk)