

M&C Scout District

GDPR - Data Privacy Policy

V1.0 August 2018

Background

As a Charity, M&C District Scouts is entitled to hold data for Safety purposes. However, we would like to hold more than this data, for the reasons stated below, and so we need to ask your permission (13+ year olds) or your Parent's permission (under 13s) to hold this data.

This 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 the General Data Protection Regulation (GDPR). These is a new Regulation across the EU, replacing the UK 1998 Data Protection Act, and overseen by the Information Commissioner's Office (ICO).

Who we are

Macclesfield and Congleton Scout District is a youth charity, as part of the UK Scout Association. See <http://scouts.org.uk> for more information.

Every year we hold an annual general meeting where members of the charity executive are elected. The District comprises all adult members in the District, a Scout Network, and 7 Explorer Scout Units. We are based at West Bond Street, Macclesfield, Cheshire Sk11 8EQ. For Data purposes, the District does not include any youth members of Groups within the District.

Data Ownership

Under GDPR, any set of data must be owned by a "Data Controller", who will ensure that it is entered, maintained, used and deleted appropriately by "Data Processors" (who must manipulate data in accordance with Procedures owned by the Data Controller). Data Processors will be authorised by the Data Controller. The Data Controller for our District is Macclesfield & Congleton District Scout Council. The District Commissioner is their nominated representative. The GDPR Regulation applies to ALL copies of data, in ANY media (electronic, paper etc)

Your rights-

You have the right to:

- object to how we process your personal information.
- access, correct, sometimes delete and restrict the personal information we use.
- complain to us and to the data protection regulator.

If you wish to exercise any of these rights, please contact the District Commissioner or your Section Leader for more information.

You can request access to view and edit your personal information directly on our online membership system Online Scout Manager (Youth Members).

All adult members can access and edit their personal information on the Compass system at any time.

If we are unable to help, or you aren't satisfied with our response, you also have the right to lodge a complaint with the UK's supervisory authority –

The Information Commissioner's Office (ICO). The ICO can be contacted:

1. By post – The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.
2. By telephone – 0303 123 1113
3. Via their website – www.ico.org.uk

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, 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 13, this information must be obtained from a parent/guardian and cannot be provided by the young person.

What we would like to use your personal information for

We collect your personal and medical information for your safety and protection whilst in the care of the District, including "In Touch".

We collect religious data to respect your beliefs with regards to activities, food and holidays.

We store contact information data to have the ability to contact the member, parents and guardians, to inform them of meetings and events. that the District/Sections intend to run, and also distribute information from Scouts UK, the County Scout organisation etc.

We use photographs in various publications to show Scouting activities and publicise and grow the movement if you do not wish photos of yourself to be used, you must inform us.

We store attendance and badge progress data to enable awards to be gained.

We store financial/Gift Aid information to enable proper financial control within the District: year-end accounts, expenses payments etc.

We store your Data Privacy permission form to record that you have given permission for all the above!

Our legal basis for using your personal information

We only use your personal information where that is permitted by privacy laws. This includes when:

- a) We need to use the information to comply with our legal obligations.
- b) We need to use the information to contact you, regarding meetings, events, collection of membership fee's etc, i.e. for the safe day to day running of the group, and
- c) It is fair to use your contact information in your interests, where there is no disadvantage to you.

Sharing and transferring personal Information

We will only normally share personal information amongst our scout District leaders and executive members.

We will however share your personal information with others outside the District Scout organisation where we need to meet or enforce a legal obligation, this may include Cheshire County 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 the District to another District we will transfer your personal information to them with your permission.

Sometimes we may nominate a member for a national award, (such as Scouting or Duke of Edinburgh award), and Leader Awards: such nominations would require us to provide contact details and training records to that organisation.

We will never sell your personal information to any third party.

Please note: we also ask that you do NOT post information about other Scouts online, unless you have their permission. You must not post information as if you are posting on behalf of the Scout District/Group – if you have an interesting post, please pass it to a Leader to publish!

Third Party Data Processors

M&C District Scouts uses 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 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, more information is available at <https://www.onlinescoutmanager.co.uk/security.php>
- **Dropbox** for e.g. secure transfer of limited personal information for events.
- **Google Drive** for e.g. secure transfer of limited personal information for events.
- **email**

District GDPR Procedures must be followed when working with these technologies.

How long we keep your personal information for

We will retain your personal information, throughout the time you are a member of M&C District Scouts.

We will retain some information re: event attendance, Accidents, for a period of up to 18 years (until age 24) to fulfil our legal obligations for insurance and legal claims as advised by Scout Association insurers.

We will also keep any Gift Aid Claim information for the statutory 7 years as required by HMRC (which may be beyond age 21).

Automated decision making

The District has no automated decision-making systems.

Transfers outside the UK

M&C District 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 and/or booking of activities, 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

We store core personal information in one of two secure digital online database systems (generally OSM for Youth Members, Compass for adults). Access to that data is restricted and controlled.

All data will be managed in accordance with the District GDPR Procedures, and deleted in accordance with retention periods stated in the District GDPR Analysis sheet.

Electronic

Compass: - is the online membership system of The Scout Association, this system is used for the collection and storage of Adult personal data. Every adult with a Compass record can access and update their own record.

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 Adults and Youth members for the day to day running of the group.

DBS Online service

PCs belonging to Data Processors

Google Drive, DropBox, email etc

Paper

Printed records and Event data

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

- Initial information gathering form when first joining
- DBS and Leader Application forms
- Health and contact records update forms.
- Events (including Application forms, Health Forms, and activity organisation forms)*
- Accident Book (in First Aid kits)
- Gift Aid Collection forms..
- Award notifications/nominations

* **Events** - We hope you will take up the opportunity to attend events and camps: where necessary to fulfil our legal obligations we will be required to potentially have a less secure means to access personal information, such as multiple printouts of personal contacts and medical information, (including specific event contact forms), rather than relying on secure digital systems, since events are often 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:

- a) Transfer of paper is secure, such as physical hand to hand transfer or registered post.
- b) Paper forms are securely destroyed after they expire.
- c) Paper records are always held securely, including when in transit.
- d) If copies of Event information are transferred to somebody temporarily, the Event Organiser is responsible for ensuring these are destroyed after the event.