

Data Privacy & Fair Processing Notice 7th Colchester (St John's) Scout Group

This is the Data Privacy & Fair Processing Notice of 7th Colchester (St John's) Scout Group. It 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 Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

This Privacy Notice/Policy applies to members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public who will make contact with 7th Colchester (St John's) Scout Group.

Our local retention periods for particular data may vary from the UK Scout Association's Data Protection Policy. Their Data Privacy Policy can be found at www.scouts.org/about-us/policy/privacy-policy and their Data Protection Policy can be found at www.scouts.org.uk/about-us/policy/data-protection-policy

1. Who are we?

7th Colchester (St John's) Scout Group is a youth charity. 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 Scout Association. This means we are not required to be individually registered with the UK Charity Commission.

Every year we hold an Annual General Meeting (AGM) where members of the charity Executive Committee (our Trustees), are elected. Any parent of a youth member can decide to be in the Executive at the AGM and every parent has the right to attend the AGM.

Usually our weekly section meetings for Beavers, Cubs and Scouts take place at St.Johns Cof E Primary School, Clay Lane Grove, Colchester, CO4 0HH. *(From March 2020 to date, we have been meeting virtually using Zoom every week due to COVID-19 restrictions)*

Our 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. 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 Group's (the data controller's), possession or likely to come into such possession. The processing of personal data is governed by the GDPR.

We may collect the following personal information:

- **Personal contact details** such as name, title, address, telephone numbers and personal email address - so that we can contact you.
- **Date of birth** - so that we can ensure young people are allocated to the appropriate Section for their age and that adults are old enough to take on a Scouting appointment
- **Gender** – to address individuals correctly and accommodate for any specific needs.
- **Emergency contact information** - in the event of an emergency.

- **Government identification numbers** e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.
- **Training records** - so that members can track their progression through the Scout programme or adult training scheme.
- **Race or ethnic origin** - to make suitable arrangements based on members' cultural needs.
- **Health records** - to make suitable arrangements based on members' medical needs.
- **Criminal records checks** - to ensure Scouting is a safe space for everyone.
- **School data** - requested when Beavers join the Group, to help settle Young People into lodges with peers from their school

3. How we gather personal information

The majority of the personal information we hold is provided to us directly by parents / legal guardians in either paper form or preferably via our online membership system. 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 the age of 18, this information will only be obtained from a parent / guardian and cannot be provided by the young person.

4. How do we process your personal data?

We comply with our obligations under the "GDPR" by keeping personal data up to date with your assistance; 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, parents and guardians to inform them of meetings and events that the group may be running or attending.

We use personal data for the following purposes:

- personal and medical information is collected for the protection of that person whilst in the care of the Scout Group
- religious data may be collected to enable us to respect a person's beliefs with regards to activities, food and holidays
- 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 fundraise and promote the interests of the Scout Group
- 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 running at 7th Colchester (St John's) Scout Group

5. What is the legal basis for processing your/your child(ren)'s personal data?

We only use your personal information where it 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 to contact you regarding meetings, events, collection of membership fees 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

d) The processing is necessary for the person's legitimate interests or the legitimate interests of our Scout Group unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

6. How we store personal data

We are committed to the protection of your personal information. We generally store personal information in one of two secure digital online database systems, where access to that data is restricted and controlled. It is kept only for as long as necessary for the purpose for which it is used. We have two paperwork archives – Accounting archive is kept in line with the Charities retention schedule, and a 7th Colchester Historic archive.

Compass is the online membership system of The Scout Association. It 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 Adults and Youth members for the day to day running of the group.

Google Suite - cloud data storage for the Group, holding policies, procedures and central records - including financial information for the purposes of financial accounting of the Group. Also contains details of ad hoc activities.

Printed records and event data - paper is still occasionally used within the sections to capture and retain some data. For example:

- 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 Membership manager and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

Gift Aid

The collection forms will be securely held by the Group Treasurer to aid in the collection of Gift Aid for monthly membership fees. We have a legal obligation to retain this information for 7 years after our last claim. New Gift Aid declarations are collected via Online Scout Manager and managed there.

Events

As a member of 7th Colchester (St John's) Scout Group, it is hoped parents and Young People 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:-

- a) Transfer of paper is secure, such as physical hand to hand transfer or registered post.
- b) Paper forms are securely destroyed after use.
- c) Secure destruction will be through a shredding machine or securely burned.
- d) Always keeping the paper records secure, especially when in transit, by using:

- i. A lockable container
 - ii. A lockable filing cabinet if long term stored.
- e) If transferred to somebody, we will audit that they return them when the event is complete.

7. Sharing and transferring personal Information

We will only normally share personal information within our Scout Group with our Leaders and Executive members.

We will, however, share your personal information with others outside our Scout Group where we need to meet or enforce a legal obligation. This may include Colchester North District 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 specific purposes.

If you move from 7th Colchester (St John's) Scout Group to another Scout Group or Explorer Scout Unit we will transfer your personal information to them.

Photographs

We use Online Scout Manager system to record a parent/guardian's consent or declinature to give permission for use of photographs.

There are occasions and events where we **are** a data controller, and others where we **are not** a data controller. There is a risk at public events that photographs may be taken by people outside our Group and distributed. Parents need to decide whether or not to send their child to these public events. If we wish to include a photograph of some of our Young People in a media article outside of the Group, we will request parent/guardians' express permission on each occasion.

Awards

Sometimes we may nominate a member for a national award, such as Queen's Scout or Duke of Edinburgh award. Such nominations require we provide contact details to the awarding organisation; this is may be done on paper via registered post or via email.

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

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.

Third Party Data Processors

7th Colchester (St John's) Scout Group 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 leaders, adults and parents who have undergone a Disclosure and Barring Service (DBS) check.
- **Online Youth Manager Ltd (Online Scout Manager)** - used to record personal information, badge records, event and attendance records. We have a data processing agreement in place with Online Youth Manager, more information is available at <https://www.onlinescoutmanager.co.uk/security.php>
- **Google Suite** – secure online storage of documentation such as group policies, meeting minutes, AGM documentation, Group accounts, action logs for members of the Executive Committee.
- **Whats App** – all sections have a parents' Whats App group to share information about events, badges and weekly meetings. The Leaders and Executive teams also have Whats App groups to assist regular communication. Full details of these groups are contained in Appendix 1.

- **Facebook** – we have a closed, private 7th Colchester (St John's) Scout Group page to share news and photos/information about events.
- **Zoom** – since March 2020, during the COVID-19 pandemic, we have been hosting weekly Section meetings using video conferencing technology through Zoom. Meetings are not recorded. This situation will continue until we can return to face to face Scouting safely, in line with The Scouts Association guidelines.

Online Scout Manager and The Scout Association Partnership

In July 2020, 7th Colchester Scouts agreed to participate in a pilot, working in partnership with The Scouts Association (TSA) and Online Scout Manager (OSM). Although OSM and Scouts' systems won't be merging at this stage, they are exploring ways to simplify processes and make life easier for Scouting Groups.

Data protection implications of this pilot include:

- **Scout Group Executive Committees** remain independent **data controllers** for youth membership data and that of their parents.
- **OSM** remain the **data processor** for the data added to OSM.
- **TSA** will become an independent **data controller** of the member data that they take from OSM and put into their systems in the event of them using OSM to obtain the information, which will only be as a last resort or emergency for a specific safeguarding case. This is a subtle but important point as the member's name, contact details and date of birth will be added to their internal safeguarding systems, which will make them a data controller of that data too. This will not give them any rights to edit the data in OSM, and Scouts will be liable for the security of the data in their systems.
- Authorised staff at TSA will also be looking at anonymous data in OSM, which isn't personally identifiable. This will be general membership data (numbers, ages, postcodes, genders, groups) so they can report on national trends: not at local Group level.

This approach has been agreed by the Scouts Information Governance team, the OSM Data Protection Officer and the Information Commissioners Office.

Automated decision-making

7th Colchester (St John's) Scout Group does not have any automated decision-making systems.

Transfers outside the UK

7th Colchester (St John's) 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.

8. How long do we keep your personal data?

We will retain your personal information throughout the time you/your child(ren) are a member of 7th Colchester (St John's) Scout Group.

We will retain your/your child(ren)'s full personal information for a period of one year after you/they have left our Group, and in a much more limited form (just name, badge and attendance records) for a period of up to 15 years (or until the age 21) to fulfil our legal obligations for insurance and legal claims.

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

9. 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:

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.

- The right to rectification –you can update your data if it is inaccurate or if something is missing. You can view and edit your personal information directly on our online membership systems Online Scout Manager (for our Young People) and Compass (for our Leaders).
- The right to restrict processing – if you think there is something wrong with the data being held about you, or you are not sure if we are complying with rules, you can restrict any further use of your data until the problem is resolved.
- The right to data portability – 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.

Please contact your child(ren)'s leader, our Group Scout Leader or our Data Protection Lead for more information, in the first instance.

10. 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.

11. Contact Details

To exercise your rights, or raise a query or complaint, please in the first instance contact our Data Protection Lead - Clare Chatfield at 7th Colchester (St John's) Scout Group email **clare.chatfield@7thcolchesterscoutgroup.org.uk**

You can also 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.

Reviewed and updated: 19 January 2021

Appendix 1: WhatsApp Groupings

We have created various groups on Whats App, to enable our Executive team, Group Scout Leader, Section Leaders and Assistant Section Leaders to communicate with each other. This makes planning for meetings and events, as well as raising questions between the groups, quicker and easier than using email or calls. Everyone can see the same messages at the same time and share information.

Membership Review - the various groups are closely managed by the administrators. Only valid members of the groups are invited, and are removed when appropriate. There is always one administrator and at least one other person responsible for reviewing each group annually, and as people leave/join the 7th Scout Group, including movement between sections.

Details of the What's App groups which exist, and who the members are for each, are shown:

Executive Groups

Group	WhatsApp Group Name	Members
Officers group	Officers of the 7th	Chair, Treasurer, Secretary, Group Scout Leader
Executive group	7th Scout Group Exec	All members of the Executive Committee
Leadership group	7th Col Leadership team	Officers Group and all Section Leaders & assistants
Leaders and Executive group	7th Col Leaders/Exec	Leadership Group, Executive group, and sectional adult volunteers

Section Groups

Group	WhatsApp Name			Members
	Beavers	Cubs	Scouts	
Section Leaders	1:1	-	-	Section Leader and Assistant(s)
Leaders group	Fabulous Five	Cub Leaders	ONLY 7 th Scout Leaders	All sectional adult volunteers
Young Leaders	Young Leaders	Young Leaders	7th Scout Leaders	Leaders Group and Young Leaders
Parent group	Beaver parents	Cub parents	7th Colchester Scouts	Section Leader, Assistant(s) and parents of Young People within the section

Other Groups

Additional Whats App groups will be created for specific purposes, such as camps or other events. These groups are to have all members removed within one month of the event occurring, or the reason for the group being finalised. Once all members are removed, the group is closed immediately and archived if required.

1:1 groups are not tracked or reported by the Group. The use of groups for 7th Colchester Scouting related conversation is encouraged over personal 1:1. As per Safeguarding direction from POR – absolutely **NO 1:1s WITH YOUNG PEOPLE ARE PERMITTED** (including Young Leaders).

Reviewed: 19th January 2021