

Blackpool District Scout Council

Data Protection & Retention Policy

What is this Data Protection & Retention Policy?

This Data Privacy Notice/Policy describes the categories of personal data Blackpool District Scout Council process and for what purposes. Blackpool District Scout Council 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 Blackpool District Scout Council.

Who we are

Blackpool District Scout Council are a registered charity with the Charity Commission for England & Wales; charity number 521534.

The Data Controller for Blackpool District Scout Council is the Trustee Board who are appointed at an Annual General Meeting and are Charity Trustees. Being a small charity, we are not required to appoint a Data Protection Officer.

From this point on Blackpool District Scout Council will be referred to as “we” or “BDSC”.

The data we may process

The majority of the personal information we hold, is provided to us directly by you or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership system Compass. In the case of adult members and volunteers, data may also be provided by third parties, 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 or guardian and cannot be provided by the young person.

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 an appointment with Scouting.
- **Gender** – so that we can address individuals correctly and accommodate for any specific needs.
- **Emergency contact information** - so that we are able to contact someone in the event of an emergency.
- **Government identification numbers** eg. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.

- **Bank account details, payroll information and tax status information** - so that we are able collect gift aid from HMRC where donations are made.
- **Training records** - so that members can track their progression through the Scout programme or adult training scheme.
- **Race or ethnic origin** - so that we can make suitable arrangements based on members cultural needs.
- **Health records** - so that we can make suitable arrangements based on members medical needs.
- **Criminal records checks** - to ensure Scouting is a safe space for young people and adults.

The lawful basis we process your data by

We comply with our obligations under the GDPR by keeping personal data up to date; 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.

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will mostly align to the lawful basis of legitimate activities of an association. Explicit consent is requested from parents/guardians to take photographs of our members. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

We use personal data for the following purposes:

- to provide information about Scout meetings, activities, training courses and events to our members and other volunteers in Blackpool District Scout Council.
- 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 Scouting.
- 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 being run or attended by BDSC.
- to ensure and evidence your suitability if volunteering for a role in Scouting
- to contact your next of kin in the event of an emergency
- to ensure you have and maintain the correct qualifications and skills.

We use personal sensitive (special) data for the following purposes:

- for the protection of a person's health and safety whilst in the care of BDSC.
- to respect a person's religious beliefs with regards to activities, food and holidays.
- for equal opportunity monitoring and reporting.

Our retention periods

We will keep certain types of information for different periods of time in line with our retention policy.

We will keep your information for as long as necessary to fulfil our legal obligations and in accordance with statutory retention periods.

We will retain your personal information throughout the time you/your child(ren) are a member of BDSC and its subsidiaries.

We will retain your full personal information for a period of one year after you have left BDSC 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).

The Scout Association's Data Protection Policy can be found [here](#) and the Data Privacy Notice [here](#).

Sharing your information

Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment in Blackpool District Scout Council.

We will share the personal data of youth members and their parents/guardians with The Scout Association Headquarters for the purpose of managing safeguarding cases. The privacy and security notice for The Scout Association can be found here: <https://www.scouts.org.uk/DPPolicy>.

The sharing of this data, in some cases will be via the Online Scout Manager platform which is used by Blackpool District Scout Council to manage youth membership. The privacy and security notice for OSM can be found here: <https://www.onlinescoutmanager.co.uk/security.html>.

Adult volunteers

We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association for Blackpool District Scout Council as well as with The Scout Association Headquarters as data controllers in common.

All data subjects

We will however share your personal information with others outside of Blackpool District Scout Council where we need meet a legal obligation. This may include The Scout Association and its insurance subsidiary (Unity Insurance Services), local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.

We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so.

If you move from BDSC to another Scout District, Explorer Scout Unit or Scout Network we will transfer your personal information to them.

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

Sometimes we may nominate a member for national awards, (such as Scouting awards or Duke of Edinburgh awards) such nominations would require us to provide contact details to that organisation.

Where personal data is shared with third parties, we will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR.

How we store your personal data

We generally store personal information in the following ways:

Compass - the online membership system of The Scout Association, this system is used for the collection and storage of adult volunteer personal data.

Online Scout Manager - the online membership system of Online Youth Manager, this system is used for the collection and storage of youth and adult member personal data.

Microsoft Office 365 Enterprise - used for secure transfer & storage of personal information for events and administration (including adult volunteer and youth member data).

Printed records and Event data

Paper is sometimes used to capture and retain some data for example the following:

- New joiners form
- Gift Aid Collection forms
- Events coordination with event organisers

In the case of **Joining forms & Event forms** this information is securely held by the leader and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

Gift Aid collection forms if not collected digitally will be securely held by the 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.

Sometime events and activities 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. Where possible we will collect this data digitally using encrypted forms but when paper is required, we will ensure:

- Transfer of paper is secure, such as physical hand to hand transfer or registered 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, especially when in transit, by using:
 - A lockable briefcase, lock box or secured dry bag in a zipped pocket on your person.
 - A lockable filing cabinet if long term stored.
- If transferred to somebody, we will audit that they return them when the event is complete.

Data security

BDSC takes the security of people related personal data seriously. Everyone who handles personal data on behalf of BDSC must make sure it is held securely to protect against unlawful or unauthorised processing and accidental loss or damage.

We take appropriate steps to make sure we keep all personal data secure, and we make all of our volunteers aware of these steps. In most cases, personal data must be stored in appropriate systems and encrypted when being transported.

The following is general guidance for everyone working within BDSC.

- It is expected that individuals will store data within BDSC systems which are password protected and regularly backed up. Should individuals require data to be stored outside of these systems, they must only store personal data on networks, drives or files that are password protected and regularly backed up including mobile phones. Approval should be sought from the District Commissioner before using any non BDSC system.
- You should not download personal data to personal devices such as laptops and USB sticks unless absolutely necessary. Access to this information must be password protected and the information should be deleted immediately after use. Contact information should only be stored on Compass, Online Scout Manager or the BDSC Office 365 system.
- You should keep paper records containing personal data secure eg. in a locked filing cabinet. If you need to move paper records, you should do this strictly in line with data protection rules and procedures.
- You must keep all personal data secure when travelling eg. lockable briefcase, lock box or secured dry bag in a zipped pocket on your person.
- Personal data relating to members and volunteers should usually only be stored on the appropriate membership database (Compass for adults) or (Online Scout Manager for young people and adults) which are known to have the appropriate security in place. Data may also be processed or stored on the BDSC Office 365 system.
- Any paper forms used to collect personal data should kept to a minimum and securely destroyed once they are no longer required. Paper forms should be used to collect data and transferred to a digital system immediately or use the digital systems straight away.
- When sending larger amounts of personal data by post, you should use registered mail or a courier. Memory sticks must be encrypted.
- All BDSC appointments are required to use approved systems sanctioned by the Media, Digital & Communications team and approved by the BDSC Board of Trustees including the District's Office 365 system for all Scouting related communication and storage of data.
- When sending personal data by email, this must be appropriately authenticated, and password protected. It is preferable to share private authenticated links to documents within the BDSC SharePoint/OneDrive system rather sending attachments via email.
- Do not send financial or sensitive information by email unless it is encrypted.
- You should not share your passwords with anyone.

- Different rights of access should be allocated to users depending on their need to access personal or confidential information. You should not have access to personal or confidential information unless you need it to carry out your role.
- Before sharing personal data with other people or organisations, you must ensure that they are GDPR compliant.
- In the event that you detect or suspect a breach you should inform the Blackpool District Scout Council Board of Trustees immediately.

Individual responsibilities

Individuals are responsible for helping BDSC to keep their personal data up to date. Individuals should let BDSC know if data provided to BDSC changes, for example if an Individual moves to a new house or changes their bank details.

Individuals may have access to personal data of other Individuals while undertaking their Scouting role. BDSC relies on Individuals to help meet its data protection obligations to all Individuals.

Individuals who have access to personal data are required:

- To access only data that they have authority to access and only for authorised purposes.
- Not to disclose data except to Individuals or others who have a legitimate need.
- To keep data secure, for example taking adequate precautions to prevent unauthorised access to premises, computer access, including password protection and secure file storage and destruction.
- Not to remove personal data, or devices containing or that can be used to access personal data, without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device.
- Not to store personal data on local drives or on personal devices that are used for Scouting purposes. All data must be stored on either Compass, Online Scout Manager, BDSC OneDrive and Microsoft 365 system.
- Individuals should not send personal information using personal email accounts.
- To destroy any personal holdings of such data when there is no further need for it.

Failing to observe these requirements may amount to a disciplinary or dismissal, which will be dealt with under the Scout Association's appointments process.

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.

Your rights

As a Data Subject, 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 Information Commissioner's Office (www.ico.org.uk).

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

- **The right to be informed** – you have a right to know how your data will be used by us.
- **The right to access your personal data** – you can ask us to share with you the data we have about you. This is a Data Subject Access Request.
- **The right to rectification** – this just means you can update your data if it's inaccurate or if something is missing. Adult members will be able to edit and update some information directly on The Scout Association's Compass membership system.
- **The right to erasure** – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held by The Scout Association for legal reasons.
- **The right to restrict processing** – if you think that we are not processing your data in line with this privacy notice then you have the right to restrict any further use of that data until the issue is resolved.
- **The right to data portability** – this means that 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.
- **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, it's highly unlikely that this will be used by us.

Who to contact

If you have any queries relating to this Data Protection and Retention Policy or our use of your personal data, please contact us via info@blackpoolscouts.org.uk.