

## **1**<sup>st</sup> Southgate Scout Group privacy notice/policy

What is this privacy notice/policy?	<ul> <li>This Data Privacy Notice/Policy describes the categories of personal data 1<sup>st</sup> Southgate Scout Group process and for what purposes 1st Southgate Scout Group is committed to collecting and using such data fairly and in accordance with the requirements of the Data Protection Act 2018 (DPA 2018), the UK law that encompasses the General Data Protection Regulations (GDPR).</li> <li>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 1<sup>st</sup> Southgate Scout Group.</li> </ul>
Who we are	<ul> <li>1<sup>st</sup> Southgate Scout Group is a registered charity with the Charity Commission for England &amp; Wales; charity number 305881.</li> <li>The Data Controller for 1<sup>st</sup> Southgate Scout Group is the Trustee Board which is appointed at an Annual General Meeting, its members are the charity's trustees. The Chair of the Charity Trustees is [currently a vacant position – e-mail address is still monitored] chair@1stsouthgate.cdscouts.org.uk.</li> <li>From this point on 1<sup>st</sup> Southgate Scout Group will be referred to as "we".</li> <li>Being a small charity, we are not required to appoint a Data Protection Officer.</li> </ul>
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.



The lawful basis we process	<ul> <li>We may collect the following personal information:</li> <li>Personal contact details such as name, title, address, telephone numbers and personal email address - so that we can contact you.</li> <li>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.</li> <li>Gender - so that we can address individuals correctly and accommodate for any specific needs.</li> <li>Emergency contact information - so that we are able to contact someone in the event of an emergency.</li> <li>Government identification numbers e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.</li> <li>Tax status information - so that we are able to collect gift aid from HMRC where donations are made.</li> <li>training records - so that members can track their progression through the Scout programme or adult training scheme.</li> <li>Race or ethnic origin - so that we can make suitable arrangements based on members cultural needs.</li> <li>Health records - so that we can make suitable arrangements based on members medical needs.</li> <li>Criminal record schecks - to ensure Scouting is a safe space for young people and adults.</li> </ul>
your data by	<ul> <li>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.</li> <li>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.</li> <li>We use personal data for the following purposes:         <ul> <li>to provide information about Scout meetings, activities, training courses and events to our members and other volunteers in 1<sup>st</sup> Southgate Scout Group</li> <li>to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our</li> </ul> </li> </ul>



	constitution					
	to administer membership records					
	<ul> <li>to fundraise and promote the interests of Scouting</li> </ul>					
	to manage our volunteers					
	<ul> <li>to maintain our own accounts and records (including the processing of gift aid applications)</li> </ul>					
	• to inform you of news, events, activities and services being run or attended by 1 <sup>st</sup> Southgate Scout Group					
	<ul> <li>to ensure and evidence your suitability if volunteering for a role in Scouting</li> </ul>					
	<ul> <li>to contact your next of kin in the event of an emergency</li> </ul>					
	<ul> <li>to ensure you have and maintain the correct qualifications and skills.</li> </ul>					
	We use personal sensitive (special) data for the following purposes:					
	<ul> <li>for the protection of a person's health and safety whilst in the care of 1<sup>st</sup> Southgate Scout Group</li> </ul>					
	<ul> <li>to respect a person's religious beliefs with regards to activities, food and holidays</li> </ul>					
	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 periods. See Appendix A					
	The Scout Association's Data Protection Policy can be found <u>here.</u>					
Sharing your information	Young people and other data subjects					
	We will normally only share personal information with adult volunteers holding an appointment in the 1 <sup>st</sup> Southgate					
	Scout Group					
	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					
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	Headquarters for the purpose of managing safeguarding cases. The privacy and security notice for The Scout Association can be found here: <u>https://www.scouts.org.uk/DPPolicy</u> . The sharing of this data will be via the Online					



	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 the 1 <sup>st</sup> Southgate Scout Group 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 $1^{st}$ Southgate Scout Group 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.
	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 DPA 2018.
How we store your personal	We generally store personal information in the following ways:
data	
	Compass - is the online membership system of The Scout Association, this system is used for the collection and storage
	of adult volunteer personal data.
	<b>Online Scout Manager</b> - is the online membership system of Online Youth Manager, this system is used for the
	collection and storage of youth member personal data.
	In addition, adult volunteers will hold some personal data on local spreadsheets/databases.



	<ul> <li>Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example: <ul> <li>Gift Aid administration</li> <li>Event registration</li> <li>Health and contact records forms (for events)</li> <li>Events coordination with event organisers</li> </ul> </li> <li>Paper records for events are used 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.</li> </ul>
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.
How we provide this privacy notice	This notice will be placed on the website of 1 <sup>st</sup> Southgate Scout Group. A printed version is also available on request.
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).
	<ul> <li>Unless subject to an exemption under the DPA 2018, you have the following rights with respect to your personal data:</li> <li>The right to be informed – you have a right to know how your data will be used by us.</li> <li>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.</li> </ul>
	<ul> <li>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.</li> </ul>



	<ul> <li>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.</li> <li>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.</li> <li>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.</li> <li>The right to object – you can object to the ways your data is being used.</li> <li>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.</li> </ul>
Who to contact	If you have any queries relating to this Privacy Notice or our use of your personal data, please contact our Trustee Board Chair at <u>chair@1stsouthgate.cdscouts.org.uk</u>
Version number and date of the last review	VERSION NUMBER 1.2 - DATE: 25 <sup>th</sup> April 2024



## Annex A - Retention periods

The following retention periods are analysed into the categories of data held within 1<sup>st</sup> Southgate Scout Group, these are as follows:

Data Process	Data Type	Retention	Justification
Want to Join	Personal data	1 year after enquiry or until member joins, whichever is shorter	To keep them informed of their joining status
Joining – including the role and dates of joining	Personal and Sensitive data (special category)	10 years after leaving the data will be reduced to only include name, date of birth, awards, training records, events attended, roles and permits held and any complaints in summary format. This remaining data will be retained for 100 years.	The 10-year retention of all data is required to provide tenure and service records in the event an individual wants to re-join. The 100 years retention of data is required for evidence requests from statutory agencies
Youth award registrations	Personal and Sensitive data (special category including citation)	6 months after the member turns 25	To retain their award registrations for the duration of the eligibility period
Youth award completions	Personal data and Sensitive data (special category including citation)	Permanent for basic data; name, county, award, membership number, completion date	Historic record of award completions
Adult award registrationsPersonal and Sensitive data (special category including citation)6 months after the registration		6 months after the registration	To retain their award registrations for the duration of the eligibility period

## Members and volunteer's data



Adult award completions	Personal data and Sensitive data (special category including citation)	Permanent for basic data; name, county, award, membership number, completion date	Historic record of award completions
Research surveys	Personal and Sensitive data (special category)	18 months	To keep a collation of completing members and compare answers from the previous year
Scouts Experience Survey	Personal and Sensitive data (special category)	15 Years	To keep a collation of completing members and compare answers from the previous years
Vetting	Personal Data – Disclosure Certificate	6 months after issue	In line with DBS, Access NI and Disclosure Scotland Code of Practice
Safeguarding – Adult volunteer perpetrator	Personal and Sensitive data (special category)	Adult – 100 years after case closure. Will include all case notes, including those of witnesses and young person along with any litigation correspondence until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject to the joining data process retention period.	Required for required for evidence requests from statutory agencies
Safeguarding – Young person -Welfare	Personal and Sensitive data (special category)	Young Person – 7 years after last communication with the Young Person or Family.	Required for evidence requests from statutory agencies



Safeguarding – Young person perpetrator	Personal and Sensitive data (special category)	Young Person – 100 years after case closure. Will include all case notes, including those of witnesses and adult volunteers along with any litigation correspondence, until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject to the joining data process retention period.	Required for evidence requests from statutory agencies	
Incident – personal injury (including sexual abuse/psychological damage)	Personal and Sensitive data (special category)	4 years after incident, or 4 years after alleged victim turns 18 if later	Fight a case – Limitation act 1980	
Incident – not involving personal injury	Personal and Sensitive data (special category)	7 years after incident, or 7 years after alleged victim turns 18 if later	Fight a case – Limitation act 1980	
Permit Assessments	Personal data	6 months after the permit expires	Required for permit renewals and queries	

## Donors' data

Data Process   Data Type		Retention	Justification
Individual Givers	Personal Data	18 months post last donation	To keep an individual informed of their donation
	Gift aid declaration	6 years after the end of the year or accounting period that includes the last donation	HMRC Tax Audit
		6 years after the end of the year or accounting period that includes the last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI



Partnerships Perso	sonal Data	3 Years	To answer queries on the donations and maintain a record of partner donors
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Event registrants'	and	part	icipants	data	

Data Process	Data Type	Retention	Justification
Ad-hoc events	Personal and Sensitive data (special category)	2 months after event. Scouting Young People attendance records will be retained for 100 years	Required for enquiries on the event and responding to incidents. The 100 years retention of data is required for evidence requests from statutory agencies
Annual events	Personal and Sensitive data (special category)	18 months after event for personal data, 2 months after event for sensitive data (special category). Scouting Young People attendance records will be retained for 100 years	To re-invite the guests to the same event in the following year. The 100 years retention of data is required for evidence requests from statutory agencies
International events	Personal and Sensitive data (special category)	5 years after event for personal data, 2 months after event for sensitive data (special category). Scouting Young People attendance records will be retained for 100 years	To re-invite the guests to the same event at the next cycle, which are every 4 years. The 100 years retention of data is required for evidence requests from statutory agencies
Event Permits and licenses	Personal data	6 months after the permit expires	To retain a record of permits and licenses held

Approved by the Trustee Board:

Signed

Chris Hobbs (Group Lead Volunteer)

Dated: 25<sup>th</sup> April 2024