Scouts
91st Bristol Scout Group

Privacy Policy and Data Privacy Notice

This Data Privacy 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 Regulations (GDPR).

This Privacy Notice applies to Employees, Contractors, Suppliers, Members and Other volunteers, Supporters, Donors and Funders of the 91st Bristol Scout Group.

Who are we?

The 91st Bristol Scout Group, Bristol (hereafter referred to as 91st Bristol Scout Group) is a community organisation run as a local charitable trust operating under the policy organisation and rules of the Scout Association.

Every year we hold an annual general meeting where members of our board of trustees are appointed or elected.

Our Board of Trustees is the data controller for the information we collect. Any personal data that we collect will only be used in support of our aim to develop and grow Scouting. This will include the provision of Scouting meetings, activities and events for our members and other volunteers in the 91st Bristol Scout Group and through our relationship with supporters, donors and funders.

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 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"). We may collect the following personal information:

- Name and contact details
- Date of birth
- Gender
- Emergency contact information
- Marital/civil partnership status and dependants
- Government identification numbers (e.g. social security, national insurance, driving licence, passport)
- Bank account details, payroll information and tax status information
- Training records
- Race or ethnic origin, religion or belief
- Health records
- Criminal records checks
- Photographs may be taken for records or publicity at events or activities

How we gather personal information

The majority of the personal information we hold, is provided to us directly by adults or by the parents or legal guardians of youth members, young leaders and prospective members verbally or in paper form, digital form or via Online Scout Manager (OSM and associated systems) and the Scout Association system. In the case of adult members and volunteers, 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 or guardian and cannot be provided by the young person.

How do we process personal data?

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.

We use personal data for the following purposes:

- To run, manage and administer activities and events held by or on behalf of the 91st Bristol Scout Group.
- To provide information about Scouting meetings, activities and events to our members and other volunteers in the 91st Bristol Scout Group.
- To administer membership records and the annual census.
- To fundraise and promote the interests of the 91st Bristol Scout Group.
- To provide a voluntary service for the benefit of the public.
- To manage our volunteers.
- To maintain our own accounts and records (including the processing of gift aid applications).
- To ensure and evidence adult suitability for a Scouting role.
- To ensure an adult in Scouting has and maintains the correct qualifications and skills.
- For the protection of a person's health and safety whilst in the care of the Scout Group or Scout District or taking part in third party activities such as the Ten Tors competition.
- To contact a person's next of kin in the event of an emergency.
- To respect a person's beliefs and attitudes with regards to activities, food and holidays.
- For equal opportunity monitoring and reporting.
- Where it is in our interests to contact a person about products or services within Scouting.
- To provide information about news, events, activities and services being run or attended by 91st Bristol Scout Group.

What is the legal basis for processing personal data?

We only use personal information where that is permitted by the laws that protect privacy rights. We only use personal information where the law allows us to do so. Most commonly this is where:

a) The person concerned has consented to its use;
b) We need to use the information to comply with our legal obligations;
c) We need to perform any agreement we have entered into with the person concerned;
d) The processing is necessary for the legitimate interests of the 91st Bristol Scout Group or a third party unless there is a good reason to protect the personal data which overrides those legitimate interests.

Please note that we may process personal information without the knowledge or consent of the person concerned where this is required or permitted by law.

Data protection legislation identifies certain “special categories” of data, including information about race or ethnicity, religious beliefs, sexual orientation, medical conditions, and criminal convictions. We may use such information in the following ways:

a) We may use information about physical or mental health, or disability status, to ensure the health and safety of the person concerned, and to provide appropriate adjustments;
b) We may use information about race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting;
c) We will usually only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally permitted to do so. Where appropriate, we may collect information about criminal convictions as part of the adult recruitment process or we may be notified of such information directly by the person concerned or others in the course of the person concerned undertaking the role.

How we store personal data

We generally store personal information in one of two secure digital online database systems, where access to that data is restricted and controlled.

Electronic records

- **Scouts.org.uk** is the online membership system of The Scout Association, this system is used for the collection and storage of adult personal data.
- **Online Scout Manager (OSM)** 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 activities. OSM also includes a waiting list section for prospective members’ data
- **WhatsApp** is used by Trustee board members, leaders/volunteers, parent reps to co-ordinate meetings and scouting activities/camps
- **Microsoft Office 365** inc SharePoint, OneDrive is for all email correspondence, document creation, storage and sharing. Key documents, policies, risk assessments, accident reports
  In addition, we hold some personal data on local spreadsheets / databases on Leaders’ electronic equipment to which access is restricted and controlled through password protection. We occasionally use DoodlePoll for adult volunteers to poll selected dates.
- **91st Bristol Scout Group Website** where we collect data from Parents (sign up and contact from), Volunteers (contact form), and the Public (anyone can submit information to us using the contact us form) using secure online forms. The data is stored on the website hosting platform of WordPress and more information can be found here https://automattic.com/privacy/

Printed records and event data

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

- Events consent from parents
- Health and contact records forms (for events)
- Events coordination with event organisers

- Award notifications/nominations

Events

Throughout the year the 91st Bristol Scout Group will run a number of activities/events. 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) The paper records are always kept secure; and
e) If transferred to somebody, we will audit that they return them when the event is complete.

Awards

Sometimes we may nominate a member for national award (such as King's Scout or Duke of Edinburgh award). Such nominations would require us to provide contact details to the awarding organisation. This is most often done on paper via signed for post.

Sharing and transferring personal information

We will share personal information with adults holding a 91st Bristol Scout Group appointment including members of our Board of Trustees.

We will share personal information with others outside the 91st Bristol Scout Group where we need to meet or enforce a legal obligation. This may include The Scout Association and its insurance subsidiary "Unity", local authority services and law enforcement.

If a member chooses to transfer to a different Scout Group we will, with consent, transfer relevant information held on OSM, including personal, health and badge record details.

We share personal information with the Cabot Scout District on members who express an interest or become young leaders or Explorers.

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

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

Personal data will be treated as confidential. We will only share data with third parties outside of the organisation where there is a legitimate reason to do so. Where possible we will take steps to anonymise the data we provide.

Where personal data is shared with third parties, we will seek assurances that personal data will be kept confidential and that the third party fully complies with the General Data Protection Regulations (GDPR).

Third Party Data Processors

The 91st Bristol Scout Group engages the services of the following third-party data processors:

- **The Scout Association** via its adult membership system which is used to record the personal information of leaders, adults and parents who have undergone a Disclosure and Barring Service (DBS) check and more information is available at https://scouts.org.uk/privacy-policy/
- **Atlantic Data**, the company acting on behalf of The Scout Association to process DBS checks and more information is available here https://policydocuments.disclosures.co.uk/Privacy_Statement.pdf
- **Online Youth Manager Ltd** (Online Scout Manager) which is used to record the personal information, badge records, event and attendance records etc. of youth members. We have a data processing agreement in place with online youth manager and more information is available at https://www.onlinescoutmanager.co.uk/security.php
- **GoCardless** manage all of the direct debit payments via OSM and will themselves collect and store personal data relating to parents, bank account details, etc. and more information is available here https://gocardless.com/legal/privacy
- **CAFBANK** is the Scout Group bank account for all financial transactions, payments for room hire, storage, for group activities, scout organisation membership, equipment etc and to pay expenses to adult leaders.
- **Microsoft Office 365** is used for volunteers email and group and section management. Privacy statement: https://www.microsoft.com/en-gb/privacy/privacystatement
- **Dropbox Inc** is occasionally used for secure transfer of limited personal information for events and more information is available here https://www.dropbox.com/privacy
- **Google** is occasionally used for secure transfer of limited personal information for events and more information is available here https://policies.google.com/privacy?hl=en&gl=uk

Our third-party service providers are required to take appropriate security measures to protect personal information in line with our policies. We do not allow our third-party service providers to use personal data for their own purposes. We only permit them to process personal data for specified purposes and in accordance with our instructions.

Automated decision making

The 91st Bristol Scout Group does not have any automated decision-making systems

Transfers outside the UK

The 91st Bristol Scout Group will not transfer 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.

How do we protect personal data?

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for as long as necessary for the purpose for which it is used.

How long do we keep personal data?

We will only retain personal information for as long as we consider it necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the

purposes for which we process personal data and whether we can achieve those purposes through other means, the applicable legal requirements and other factors that we consider relevant. In some circumstances we may anonymise personal information so that it can no longer be associated with the person concerned, in which case we may use such information without further notice.

In general, we will retain personal information, throughout the time a person or his or her child(ren) are a member of the 91st Bristol Scout Group. Usually we will retain full personal information for a period of one year after they have left the 91st Bristol Scout 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).

Your rights and 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.

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

- **The right to be informed**: you have a right to know how your data will be used by the 91st Bristol Scout Group.
- **The right to access your personal data**.
- **The right to rectification**: this means 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 and Scouts.org.uk.
- **The right to erasure**: this means that you have the right to request that we delete any personal data. There are some exceptions, for example, some information can be held for legal reasons.
- **The right to restrict processing**: if you think there's something wrong with the data being held about you, or you aren't sure if we are complying to rules, you can restrict any further use of your data until the problem 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. This should make it easier to avoid unwanted marketing communications and spam from third parties.
- **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.

Please contact us via our website: http://91stbristol.org.uk/ if you have any questions.

Further processing

If we wish to use personal data for a new purpose, not covered by this Data Protection Notice, then we will provide 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 prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact us via our website at http://91stbristol.org.uk/.

You can 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.

Right to withdraw consent:

To withdraw consent to use your personal data please contact us via our website at http://91stbristol.org.uk/. If you withdraw your consent, we will only use your personal data in accordance with the law.

Your duty to keep us informed of changes

It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes and / or update your child's Online Scout Manager entry or your Scouts.org.uk entry.

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