

General Data Protection Policy and Guidance

For role holders and volunteers

Data protection is a key responsibility for anybody that has access to the personal data of individuals.

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Document Control

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Background

- Data protection is about ensuring people can trust us to use their data fairly and responsibly.
- We collect information about individuals for many reasons and make sure that we comply with any lawful requirements. This policy and guidance seek to give assurance of our commitment.
- **1st Weston Green Scouts has** the responsibility to ensure that we align with the General Data Protection Regulation (GDPR). The Scouts, as a national charity, is not accountable for the alignment of the GDPR of each individual charity. Each Group, District, etc are separate charities, each bearing their own responsibility.
- ‘Personal data’ is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of volunteers may contain unique ID numbers rather than names but if you use a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as personal data). The processing of personal data is governed by a legal framework.

The Legal Framework

- The UK data protection regime is set out in the Data Protection Act (DPA) 2018, along with the General Data Protection Regulation (GDPR) (EU) 2016/679 (which also forms part of UK law). It takes a flexible, risk-based approach which puts the onus on us to think about and justify how and why we use data.
- The Information Commissioners Office (ICO) regulates data protection in the UK. They offer advice and guidance, promote good practice, carry out audits, consider complaints, monitor compliance and take enforcement action where appropriate.
- There are six principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

The 6 principles in practice

The following are examples of how 1st Weston Green Scouts applies the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) in a real-world scouting context.

- **Lawfulness, fairness and transparency** – We will always explain why we're asking for specific information.
- **Purpose limitation** – When we collect data for a specific purpose it will only be used for that purpose. When we collect the names of emergency contacts for an event, we can't then use those same contact details to see if they'll help with a different event.
- **Data minimisation** – We will only ever collect the information we need. We don't need to collect information about whether an Explorer Scout is left or right-handed, or from a single parent household. It's unlikely to be relevant to anything we're doing. We will hold relevant information like permission to participate in specific activities like shooting, or swimming.
- **Accuracy** – If we have on record that an Explorer Scout had asthma as Cub, and it clears when they're older, then we will ensure that our held data accurately reflects the change of circumstance.
- **Storage Limitation** – Any information that we hold for a specific purpose will be deleted once that purpose has been fulfilled. Any data about an individual, held by 1st Weston Green Scout Group can be provided upon written request from the individual (or parent/guardian) to the data controller.
- **Integrity and confidentiality** – We will never give out the contact details of a Scout to another parent without the authorisation of the person whose information it is that we're being asked to share. The data will be held securely and shared securely, with password protection where necessary.

Group Roles

The data protection roles held within 1st Weston Green Scouts are kept up to date on the Group website.

- [1st Weston Green Scout Group | Skills for Life \(westongreenscouts.org.uk\)](https://westongreenscouts.org.uk)
- Data Controller – refer to website.
- Data Protection Officer – refer to website.

Data Subjects

- A data subject is **someone who can be identified from personal data**. Data is only collected **when an individual has given clear consent** for us to process their personal data and for a **specific purpose**.
- For our purpose this will mean **anyone involved in Scouting** including but not limited to **volunteers** and **service users**
- A Data Audit will help to identify and document this key information. See Data Audit template in the appendix.

Personal Data

Below are examples of some of the personal data we process:

- Full Names, titles, aliases, photographs
- Gender, age
- Start date/leaving date
- Contact details: telephone numbers; email addresses; home address
- Next of kin, emergency contact information
- Relevant health information for safety purposes

Data Storage

We will retain your personal information throughout the time you/your child is a member of the Scout Group. When a young person leaves the group, we will retain only their name, badge, and attendance records for a period of up to 7 years (or until the age 21) to fulfil our legal obligations for insurance and legal claims. If you have made a Gift Aid declaration, we will hold this information (which includes name and abbreviated address information) for up to six years.

Your rights in connection with personal data

You have the following rights with respect to your personal data:

1. The right to access personal data we hold on you.
 - At any point you can contact us via privacy@westongreenscouts.org.uk to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request, we will respond within one month.
2. The right to correct and update the personal data we hold on you.
 - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your personal data erased.
 - If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.

- When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).
4. The right to object to processing of your personal data or to restrict it to certain purposes only.
 - You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.
 5. The right to data portability
 - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
 6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained.
 - You can withdraw your consent easily by telephone, email, or by post (see contact details below).
 7. The right to lodge a complaint with the Information Commissioner's Office.
 - 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.

When exercising any of the rights listed above, to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.