



25th Braid Scout Data Protection Policy

Introduction

The Scout Association is committed to protecting privacy and data forms a key part of that for Scouting. This underpins our Data Protection Policy for the 25th Braid Scout Group. Our Scout Group is directly responsible for any personal data we process and we must therefore ensure that we are aware of our responsibilities under the law.

1. Purpose of this Data Protection policy and what it covers

This policy sets out the 25th Braid Scout Group's approach to protecting personal data and explains your rights in relation to how we may process personal data. We provide more detail in respect of how we process and protect your data below, particularly in section 5. This policy applies to each Section of the Group (Beavers, Cubs, Scouts and the Executive) when processing personal data in addition to or independent from the Group.

The 25th Braid Scout Group ("We" in this document) meets at Morningside Parish Church and outdoors around Morningside. The Group can be contacted by email. If you have any queries about anything set out in this policy or about your own rights, please write to the Data Protection Officer at the email address gsl@25thbraid.org.uk.

We may from time to time make minor changes to this policy. We will notify you directly when we make any substantial or significant changes to the policy.

2. Some Important Definitions

'We' means the 25th Braid Scout Group, including all of its youth Sections (Beavers, Cubs and Scouts) and its Executive Committee.

'ICO' is the Information Commissioner's Office, the body responsible for enforcing data protection legislation within the UK and the regulatory authority for the purposes of the GDPR

'The Scout Association' The Scout Association is the national scouting body who set policies and rules under which we operate. For more information on the Scout Association and its policies, please see their website at [Scouts \(www.scouts.org.uk\)](http://www.scouts.org.uk).

'Group' means the Executive Committee, the Group Scout Leader plus all of the Sections of the 25th Braid Scout Group who meet at Morningside Parish Church, including their adult leaders/volunteers, youth members and their parents/guardians.

'Beavers' means the Beaver Colony, its youth members and their parents and its adult leadership team.

'Cubs' means the Cub Pack, its youth members and their parents and its adult leadership team.

'Scouts' means the Scout Troop, its youth members and their parents and its adult leadership team.

'Personal Data' is defined in section 3

'Processing' means all aspects of handling personal data, for example collecting, recording, keeping, storing, sharing, archiving, deleting and destroying it.

'Data Controller' means anyone (a person, people, public authority, agency or any other body) which, on its own or with others, decides the purposes and methods of processing personal data. We are a data controller insofar as we process personal data in the ways described in this policy.

'Data processor' means anyone who processes personal data under the data controller's instructions, for example a service provider such as 'Online Scout Manager'.



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'Subject Access Request' is a request for personal data that an organisation may hold about an individual. This request can be extended to include the deletion, rectification, and restriction of processing.

'Online Scout Manager' OSM is the membership system used by us to record contact information, badge progress and event attendance.

'Compass' Compass is The Scouts Association's membership system for adult volunteers who hold a PVG certificate. We must comply with the Data Protection Act 2018 and the GDPR when using Compass, The Scout Association's Membership System.

'Sage' Sage is the financial system that we use to hold our financial records. It is provided by the Sage Group plc. We must comply with the Data Protection Act 2018 and the GDPR when using Sage.



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3. What is personal data?

Personal data means any information about an identified or identifiable person. For example, an individual's home address, personal (home and mobile) phone numbers and email addresses, occupation, and so on can all be defined as personal data.

Some categories of personal data are recognised as being particularly sensitive ("special category data"). These include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic and biometric information, and data concerning a person's sex life or sexual orientation.

4. How does data protection apply to our Group?

Data protection legislation applies to all data controllers regardless of whether they are charities or small organisations. It applies to Scouting in the same way as it does to other organisations. Our Group is an independent charity and insofar as we collect and store personal data about members and young people, for example, we are data controllers and must adhere to the law.

There are scenarios of joint controllership of personal data between The Scout Association and our Group, this is regarding the data held about adults who hold a PVG certificate within Compass and specifically for the activities below:

- Maintenance of our primary records, such as name, address, and leadership details
- Scout Association recording of Scouting roles, such as creation, management and deletion of role and any reasons for leaving local Scouting.
- Scout Association of PVG records and approvals. This includes ID checking
- Scout Association recording of adult training updates and Personal Learning Plan
- Scout Association recording of special activity permits approvals, such as Nights Away Permit.

The Scout Association has its own data protection policy, to which this policy adheres and is based on. In case of any doubt or questions you are advised to contact us directly on gsl@25thbraid.org.uk or to write to our Data Protection Officer (Black Penny Consulting) at Gilwell Park, Chingford, London E4 7QW who may be able to help.

Youth member data or the data of their parents or guardians is only ever shared under the following very specific circumstances.

- A specific request from The Scout Association for data about a specific young person under the Safeguarding rules
- A specific request from a parent to share data with another Scout Group due to a member moving to another Scout Group.
- A Scout moves up to an Explorer Unit at 14.

5. What type of personal data do we collect and why?

5.1 Youth Members and volunteers

We offer a service to our youth members and we benefit from the service of a large number of volunteer members giving their time to Scouting. We hold personal data (including special category data) about youth members and volunteers on our membership database. We believe it is important to be open and transparent about how we will use your personal data. Information we hold about you or your child may include the following*:

- name and contact details
- length and periods of service (and absence from service)
- details of training that youth members have received
- details of badges awarded to youth members
- details of your experiences, camps and events you have attended
- details of wider Scouting events and activities you have taken part in
- details of next of kin
- age/date of birth
- details of any health conditions
- details of disclosure checks (PVG) of adult parents and volunteers
- any complaints we have received about adult volunteer members
- details about role(s) of adult volunteers in Scouting
- details about your membership status
- details about subscription payments of youth members
- details about event and activity payments

* unless specified, the data is held about all members, youth and adult.

We need this information to communicate with you and to organise activities, run safe events and ensure our adults have approval to work with children. We also have a responsibility to keep information about you, both during your membership and afterwards (due to our safeguarding responsibilities and also to help us if you leave or re-join).

Much of this information is collected by the “parent portal” on OSM (Online Scout Manager), which the parent completes when their child joins a Section, or on the Adult Information form when a volunteer joins The Scout Association.



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Each year, The Scout Association carries out a census and requests data on ethnicity, gender, and disability within the Group. This data is collected securely by OSM but is not made available to the adult volunteers in the Scout Group. It is held as grouped numbers per Section but invisible to volunteers at the individual level.

5.2 Non-member records

In certain circumstances, contact details are retained by the Group. This usually relates to parents of members who have taken PVG approval to attend camps and other events but are not members of The Scout Association. Occasionally we may retain the contact details only of supporters of the Group, with their permission.

5.3 Alumni of the Group

We retain information about those who have left the Group for 5 years. This allows us to re-instate records if you re-join, pass your records to a future group (with permission) if you tell us you have moved and to meet our child protection requirements for adult volunteers. Child records can be removed on request (the right to be forgotten) by writing to gsl@25thbraid.org.uk.

Alumni records are held within OSM, with only basic contact details visible to adult volunteers, but other records are retained within the system.

6. Conditions for collecting personal data

6.1 Keeping to the law

We must keep to the law when processing personal data. To achieve this, we must meet at least one of the following conditions:

- **Consent** - you must give (or have given) your permission for us to use your information for one or more specific purposes
- **Performance of a contract** - we need to process the information to meet the terms of any contract you have entered into (for example when we process personal data as part of a youth member application or to retain details of young people on the waiting list)
- **Legal obligation** - processing the information is necessary to keep to our legal obligations as data controller
- **Vital interests** - processing the information is necessary to protect your vital interests
- **Public task** - processing the information is necessary for tasks in the public interest or for us as the data controller to carry out our responsibilities
- **Legitimate interests** - processing the information is necessary for our legitimate interests (see below examples)

Lawful basis	Data processing examples
Consent	<ul style="list-style-type: none"> · The transfer of youth data to another Group or Explorer Unit · The use of photography captured by leaders in the Group · Making grant applications for adult training
Performance of a contract	<ul style="list-style-type: none"> · Waiting list applications · Youth member applications · Adult volunteer membership applications
Legal obligation	<ul style="list-style-type: none"> · Responding to information requests from The Scout Association regarding safeguarding issues
Vital interests	<ul style="list-style-type: none"> · Medical history disclosure to a medical professional to protect the vital interests of a child or adult member
Public task	<ul style="list-style-type: none"> · we do not use this lawful reason
Legitimate interest	<ul style="list-style-type: none"> · we do not use this lawful reason

Information must be:

- processed fairly and lawfully
- collected for specified, clear and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- processed securely

6.2 Information that we share

We may have to share your personal data within appropriate levels of the Group and with The Scout Association, as long as this is necessary and directly related to your interests within Scouting.

We do not share personal data with companies, organisations and people outside The Scout Association, unless one of the following applies;

- We have a clear lawful basis to do so.
- For safeguarding young people or for other legal reasons.

A list of the third parties we share personal data with can be found below:

3rd Party	Data Category	Purpose
Online Scout Manager	Personal and Special	Management and maintenance of the membership platform
Sage Group plc (Sage application only)	Personal and Special	Management and maintenance of the financial records of the Group

For information on how The Scout Association holds and deals with data of adults who hold PVG certification, please see the Association's Data Security Policy at [Data Protection Policy | Scouts](#).

7. Keeping personal data secure

Everyone who handles personal data (including leaders and Executive members) must make sure it is held securely to protect against unlawful or unauthorised processing and accidental loss or damage. We make all of our volunteers aware of these steps via training. The following is general guidance for all volunteers working within our Group.

- Personal data relating to members and volunteers should only be stored on the OSM membership database or other specific databases which have appropriate security in place.
- You must not share personal details outside of the Group unless it meets one of the criteria given in Section 5.1 above.
- When sending Group emails to more than one parent, you must use the OSM system or use the BCC function, so that email addresses are not visible to other parents.
- You should not print paper records unless necessary, keep any paper records containing personal data secure and destroy them after use.
- You should not download personal data to mobile devices such as laptops and USB sticks unless necessary and the information should be deleted immediately after use.
- You must keep all personal data secure when travelling to camp.
- You must not send personal data by email or post without prior approval of the Group Scout Leader. The data must be appropriately authenticated and password protected.
- 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 have been 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 in Scouting.
- In the event that you detect or suspect a data breach, you must inform the Group Scout Leader immediately, informing them of the nature of the breach, the names of the members affected and date of the breach.

All adult volunteers regularly undertake The Scout Association GDPR training to ensure that they are aware of the above rules.

8. Responsibilities

We expect our trustees, volunteers, and any providers we use (for example OSM) to keep to the guidelines as set out in our Data Policy and under ICO and GDPR guidance when they are using or processing personal data and other confidential or sensitive information. This is set out more clearly below.

8.1 Executive Committee

The trustees in our Executive Committee have overall responsibility for the Group and for making sure that we keep to legal requirements, including data protection legislation. Our Group Scout Leader is responsible for making sure we keep to these requirements across the Group.

8.2 Data protection officer (DPO)

The Group Scout Leader is the Data Protection Officer for the Group. The data protection officer is responsible for:

- making sure that this data protection policy is up to date
- advising you on data protection issues
- dealing with complaints about how we use personal and sensitive personal data
- reporting to the District Commissioner and ICO if we do not keep to any regulations or legislation

8.3 Adult Volunteers

We expect you to keep to data protection legislation and this data protection policy, and to follow the relevant rules set out in The Scout Association's Policy, Organisation and Rules (POR).

As part of your data protection duties, you should report urgently to the Group Scout Leader any instance where the rules on how we handle personal data are broken (or might be broken).



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9. Data Retention

We may keep information for different periods of time for different purposes as required by law or best practice.

For membership information, to make sure of continuity (for example if you leave and then re-join) and to carry out our legal responsibilities relating to safeguarding young people, we keep your membership information throughout your membership and after it ends, and we make sure we store it securely.

Only those staff who need membership information to carry out their role have access to that information.

10. Rights to accessing and updating personal data

Under data protection law, individuals have a number of rights in relation to their personal data.

(a) The right to information: As a data controller, we must give you a certain amount of information about how we collect and process information about you. This information needs to be concise, transparent, understandable, and accessible.

(b) The right of subject access: If you want a copy of the personal data we hold about you, you have the right to make a subject access request (SAR) and get a copy of that information within 30 days.

(c) The right to rectification: You have the right to ask us, as data controller, to correct mistakes in the personal data we hold about you.

(d) The right to erasure (right to be forgotten): You can ask us to delete your personal data if it is no longer needed for its original purpose, or if you have given us permission to process it and you withdraw that permission (or where there is no other lawful basis for processing it).

(e) The right to restrict processing: In certain circumstances where, for lawful or legitimate purposes we cannot delete your relevant personal information or if you do not want us to delete it, we can continue to store it for restricted purposes. This is an absolute right unless we have a lawful purpose to have it that overwrites your rights.

(f) The obligation to notify relevant third parties: If we have shared information with other people or organisations, and you then ask us to do either (c), (d) or (e) above, as data controller we must tell the other person or organisation (unless this is impossible or involves effort that is out of proportion to the matter).

(g) The right to data portability: This allows you to transfer your personal data from one data controller to another.

(h) The right to object: You have a right to object to us processing your personal data for certain reasons, as well as the right to object to processing carried out for profiling or direct marketing.

(i) The right to not be evaluated on the basis of automatic processing: You have the right not to be affected by decisions based only on automated processing which may significantly affect you.



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(j) The right to bring class actions: You have the right to be collectively represented by not-for-profit organisations.

11. Subject access requests

You are entitled to ask us, in writing, for a copy of the personal data we hold about you. This is known as a subject access request (SAR). In line with legislation, we will not charge a fee for this information and will respond to your request within one calendar month. This is unless this is not possible or deemed excessive, in which case we will contact you within the month of making the SAR to state the reason for the extension and/or the charging of an appropriate fee.



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12. Further information and contacts

Data protection officer contact details and for subject access requests:

gsl@25thbraid.org.uk

In situations where you feel The Scout Association has not handled your personal data query/complaint appropriately you have the right to inform the Information Commissioners Office.

[Contact the Information Commissioner's Office](#)