

# Privacy Policy

## 52<sup>nd</sup> Reading Scout Group

This privacy policy 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).

### 1. Who we are

52<sup>nd</sup> Reading Scout Group is a youth charity. Our mission is to actively engage and support young people in their personal development, empowering them to make a positive contribution to society. We are incorporated by royal charter and are regulated as a member of The Scout Association, (see [www.scouts.org.uk](http://www.scouts.org.uk) for more information). As part of The Scout Association in England & Wales and meeting the agreed exception rules, we are not required to be individually registered with the Charity Commission.

Every year, in May or June, we hold an annual general meeting where members of the charity executive committee (our trustees), are elected, any parent of a youth member can decide to be in the executive at the AGM and every parent has the right to attend the Annual General Meeting.

We are based at Reading Scout & Guide Headquarters, 163 Northcourt Avenue, Reading, RG6 5TR.

Our Group Executive Committee is the data controller for the data we collect from you. Any personal data that we collect will only be in relation to the work we do with our members and through our relationship with supporters, donors and funders.

### 2. What is personal data?

Personal data relates to a living individual who can be identified from that data. Identification can be by the data alone or in conjunction with any other data in our Scout Group's (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 (GDPR).

### 3. How we gather your personal data

The majority of the personal data we hold is provided to us directly by yourself, by a parent or guardian in either paper form, via Google Forms or Online Scout Manager. In the case of an adult member, 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 data will only be obtained from a parent or guardian and cannot be provided directly by the young person.

#### 3.1 Photos and Videos

During our Scouting activities, we often take photographs or videos of participants which are uploaded to our online albums. These can be accessed via links on our website for the interest and enjoyment of members, their family and friends, or anyone browsing our website. We never tag or otherwise associate the name or other personal details of anyone in these albums.

As the use of this personal information falls outside the definition of the legal basis for processing personal data defined in Section 5 below, we always seek consent prior to photos/videos being taken. This consent is recorded in our membership information. Note that the media on our website is freely accessible on the public internet and will be there indefinitely unless we are requested to remove it by any of the individuals portrayed.

### 4. How we process your personal data

We comply with our obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining unnecessary or excessive amounts of data; by

protecting personal data from loss, misuse, unauthorised access and disclosure, and by ensuring that appropriate measures are in place to protect personal data.

We process the data to be able to contact the member, parents or guardians, to inform them of meetings and events that the Group, District or other Scouts may be running and/or attending.

We use personal data to

- enable us to provide a voluntary service for the benefit of the local community
- administer membership and subscription payment records
- fundraise and promote the interests of the Scout Group
- maintain our own accounts and records (including the processing of gift aid applications)
- inform you of news, events, activities and services
- ensure we meet the specific needs or preferences of individual members
- help us to monitor and achieve diversity and inclusivity
- manage our volunteers membership (including training)

## 5. The legal basis for processing personal data

We only use personal data where it is permitted by the laws that protect your privacy rights, and only where:

- we need to use the personal data to comply with our legal obligations
- we need to contact you regarding meetings, events, collection of membership subscriptions etc., - i.e. for the day to day running of the Group
- it is fair to use the personal data in your / your child's interests and where there is no disadvantage to you - this may include providing information on products or services within Scouting
- it is necessary for the individual's legitimate interests or the legitimate interests of our Group, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

## 6. How we store your personal data

We are committed to the protection of your personal data. We generally store personal data in paper form or in one or more secure digital online systems. Access to all stored data is restricted and controlled.

**Compass:** 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:** is a secure membership database system, run by Online Youth Manager Ltd., where we store the personal data of youth members and their parents(s), guardian(s) or other family member(s) / adult(s) for the day to day running of the Group and its sections.

**Members Database:** is a Google Drive spreadsheet where we store the personal data of youth members and their parents(s), guardian(s) or other family member(s) / adult(s) for the day to day running of the Group and its sections.

**Paper Forms:** are still used within the Group and its sections to capture and retain data, namely,

- Young Person Information Form
- Membership Subscription Form
- Adult Information Form
- ID Checking Form

We are required to keep Gift Aid declaration records for 6 years from the end of the accounting period they relate to, so **Membership Subscription Forms** are kept securely by our Treasurer for that period, thereafter they are destroyed.

In all other cases, this data is securely held by a leader or officer, and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

**Google Forms:** we use Google Forms to collect and process personal data for the day to day running of the Group and its sections, including membership, subscriptions, events, sleepovers and camps. This data is stored securely in the form and an associated spreadsheet on Google Drive.

Where it is necessary for the running of and/or to fulfil our legal and safety obligations during an event or camp - for example, where access to secure online data is not feasible - we may use potentially less-secure methods to access personal data, such as printouts of event contact forms, medical and dietary data. We will ensure that

- we minimise the use of paper records to only what is required for the event
- paper records are securely destroyed after use by shredding machine or burning
- if transferred, the paper records will be kept secure, especially when in transit, by using lockable briefcase or similar
- if transferred, we will audit that they are returned or destroyed afterwards.

## **7. Sharing and transferring your personal data**

We will only normally share personal data with our Scout Group Leaders, Assistants and Executive Members.

Where we need to meet or enforce a legal obligation, we will share your personal data with others outside our Scout Group. This may include The Scout Association, Unity Insurance Services, Berkshire County Scouts, Reading Central District Scouts, HMRC, local authorities and law enforcement. We will only share your personal data to the extent required for those purposes.

If you move from 52nd Reading Scout Group to another Scout Group or Explorer Scout Unit we will transfer your personal data to them.

We will never provide or sell your personal data to any third party for the purposes of marketing.

If we nominate a member for a national award, such as Scouting Merit Award or Duke of Edinburgh Award, we would be required to provide contact details to that organisation.

### **Third Party Data Processors:**

52nd Reading Scout Group employs the services of the following third-party data processors:

- The Scout Association via its adult membership system “Compass” which is used to record the personal data of leaders, adults and parents, and “Atlantic Data” for the application for and processing of Disclosure and Barring Service (DBS) checks.
- Online Youth Manager Ltd via “Online Scout Manager” which is used to record the personal data, badge records, event and attendance records etc, of our youth members.
- Google via “Google Forms” and “Google Sheets” is routinely used for secure collection and transfer of personal data for membership, subscription payments, camps and events.
- Flickr Inc, via Flickr is used to store the group’s activity photos and videos.
- Unity Insurance Services, as the group’s insurer.

Your personal data will be treated as strictly confidential. We will only share your data with other third parties (other than the Third Party Data Processors listed above) where there is a legitimate interest to do so. We will take steps to anonymise any sensitive data we provide, by collective reporting on gender, ethnicity, age, etc. where possible. If identifiable data is to be shared outside of our legitimate interest we will seek your consent.

## Automated decision making

52nd Reading Scout Group does not have any automated decision-making systems.

## Transfers outside the UK

52nd Reading Scout Group will not transfer your personal data outside of the UK without your consent, with the exceptions: (i) where an event is taking place outside of the UK and it is necessary to provide personal data 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), and (ii) where our Third Party Data Processor(s) stores data in a region outside of the EU. In such cases we shall ensure that the data processor meets the standards for data protection required under GDPR as provided by the EU-U.S Privacy Shield or appropriate EU model contract clauses.

## 8. How we protect your personal data

We take appropriate measures to ensure that all personal data that is provided 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.

## 9. How long we keep your personal data

We will retain your personal data, throughout the time you or your child/ren are members of 52nd Reading Scout Group.

We will retain your full personal data for a period of one year after you have left 52nd Reading Scout Group and in a much more limited form (just name, badge, incident reports 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 retain Gift Aid declaration records for 6 years from the end of the accounting period they relate to, as required by HMRC (which may be beyond age 21).

## 10. Your rights and your personal data

You have the right to object to how we process your personal data. You also have the right to access, correct, sometimes delete and restrict the personal data we use. In addition, you have a right to complain to us and to the data protection regulator.

Unless subject to an exemption under 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 personal data will be used by our Scout Group.
- **The right to access your personal data** - you can ask us to tell you what items of your personal data we have.
- **The right to rectification** - this means you can ask that we update your data if it's inaccurate or if something is missing.
- **The right to erasure** - you have the right to ask us to delete personal data we have that is not necessary or lawfully held.
- **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 data 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 your Section Leader, Group Scout Leader or Data Protection Officer for more information.

Whether or not you exercise your new rights is up to you – the main thing to remember is that they're there if you need them.

### **11. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy 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.

### **12. Contact Details**

To exercise all relevant rights, queries or complaints please, in the first instance, contact our Data Protection Officer via email [dpo@52ndReadingScoutGroup.org.uk](mailto:dpo@52ndReadingScoutGroup.org.uk)

You can contact the Data Commissioner's Office on 0303 123 1113 or via [this online email form](#) or at the Data Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

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