

**26th Bristol Northcote Scout Group**  
**Data Privacy Policy**  
**3 September 2020**

## What is this Privacy Policy/Notice?

This Data Privacy Policy/Notice describes the categories of personal data 26th Bristol (Northcote) Scout Group process and for what purposes.

26th Bristol (Northcote) Scout Group is committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

This Privacy Policy/Notice applies to members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public who make contact with the Group.

## Who We Are

26th Bristol (Northcote) Scout Group, from now on 'the Group', is a registered charity with the Charity Commission for England & Wales, charity number 302156.

The Data Controller for the Group is the Executive Committee who are appointed at an Annual General Meeting and are Charity Trustees. The Group Scout Leader is Richard Bennett (richard.bennett (at) 26bristolscouts.org.uk).

As a small charity, we are not required to appoint a Data Protection Officer, and have not done so.

## 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 adult 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.

We may collect the following personal information:

- Personal contact details such as name, title, address, telephone numbers and personal email address - so that we can contact you.
- 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.
- Gender – so that we can address individuals correctly and accommodate for any specific needs.
- Emergency contact information - so that we are able to contact someone in the event of an emergency.
- Government identification numbers e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.
- Bank account details, payroll information and tax status information - so that we are able to pay any staff that might be employed by us and collect gift aid from HMRC where donations are made.
- Training records - so that members can track their progression through the Scout programme or adult training scheme.
- Race or ethnic origin - so that we can make suitable arrangements based on members' cultural needs.
- Health records - so that we can make suitable arrangements based on members' medical needs.
- Criminal records checks - to ensure Scouting is a safe space for young people and adults.

## The Lawful Basis on Which We Process Your Data

We comply with our obligations under the GDPR and DPA 2018 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.

In most cases the lawful basis for processing will be legitimate interest for personal data of both our youth members and our adult volunteers. Where there is a contract, the performance of that contract will form the lawful basis. Sensitive (special category) data for both adult volunteers and our youth members will also mostly align to the lawful basis of legitimate activities of an association. Explicit consent is requested from parents/guardians to take photographs of our members. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

We use personal data for the following purposes:

- to provide information about Scout meetings, activities, training courses and events to our members and other volunteers in the Group
- to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution
- to administer membership records
- to fundraise and promote the interests of Scouting
- to manage our volunteers
- to maintain our own accounts and records (including the processing of gift aid applications)
- to inform you of news, events, activities and services being run or attended by the Group
- to ensure and evidence your suitability if volunteering for a role in Scouting
- to contact your next of kin in the event of an emergency
- to ensure you have and maintain the correct qualifications and skills

We use personal sensitive (special) data for the following purposes:

- for the protection of a person's health and safety whilst in the care of the Group
- to respect a person's religious beliefs with regards to activities, food and holidays
- 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.

- We will keep information required for processing Gift Aid for the statutory period as required by HMRC, in order to provide an adequate audit trail. According to [guidance from HMRC](#), this statutory period is 4 years.
- We will keep a record of our young members for the same period for two reasons. First to give necessary context to the Gift Aid information. Second, in case we need to refer to the history of a young member's involvement, if they go on to become a Young Leader.
- We will keep data about medical incidents involving young members until they reach the age of 21. This is in case there are legal claims concerning personal injury, which can be made up to three years after the person turns 18 (Limitations Act 1980 11(4), 28).
- After the statutory period, all other data on the young member is securely deleted.
- Adult volunteer information is kept by us for as long as the volunteer has a role with the Group. When the volunteer no longer has a role the associated data are inaccessible to

us, but remain in the Scout Association database, Compass, under the terms of their data retention policy, which can be found [here](#).

## Sharing Your Information

### Young People and Other Data Subjects

We will normally only share personal information with adult volunteers holding an appointment in the 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 Association can be found [here](#).

### 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 Group as well as with The Scout Association Headquarters as data controllers in common.

We share minimal information about adult volunteers, in order to complete the annual Census, viz. who holds which position within the Group, and how they can be contacted.

### All Data Subjects

We will however share your personal information with others outside of the Group where we need to 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.

## How We Store Your Personal Data

We generally store personal information in the following ways.

### Compass

Compass is the online membership system of The Scout Association, this system is used for the collection and storage of adult volunteer personal data.

The Scout Association's Data Protection Policy can be found [here](#).

### Online Scout Manager (OSM)

OSM is the online membership system provided by Online Youth Manager, this system is used for the collection and storage of youth member personal data, including parent or guardian contact details.

OSM is also used to process and record information needed for Gift Aid payments to the Group.

Information on OSM's Privacy Policy can be found [here](#).

### GoCardless

GoCardless is an online payment system that we use as far as possible for collecting payments for subs, camps, and events. This is a secure online payment system to allow parents to safely and easily make payment for their child. The GoCardless Privacy Policy is available [here](#). Further information about GoCardless and your data can be found [here](#).

### GSuite

The Group owns an internet domain (26bristolscouts.org.uk) which it uses for email and its website.

Google's GSuite is used by the Group to process data for the following purposes.

- Email is provided via Google's GMail service. As far as possible, all official Group emails use a suitable Group email address.

- We use Google Forms on an ad hoc basis; for instance to allow people to register for Families' Camp.

Google's Privacy Policy is [here](#).

## 10to8

We use [10to8](#) for adult volunteers to book various appointments with the Group, including starting a DBS check, and training sessions. The system is used only for the management of these appointments, and personal data is removed on a regular basis.

10to8's Privacy Policy is [here](#).

## Local Spreadsheets

The waiting list is held on a local spreadsheet. Only the data required to operate the list are recorded.

Adult volunteers may hold some personal data on local spreadsheets or databases. We will minimise the use of local spreadsheets to what is required, and securely destroy these records as soon as is practicable and lawful.

## Hard Copy

Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example:

- Gift Aid administration
- Event registration
- Health and contact records forms (for events)
- Events coordination with event organisers

Paper records may be used if an event is held where internet and digital access will not be available. As for local spreadsheets, we will minimise the use of paper to what is required, and securely destroy these records as soon as is practicable and lawful.

## 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

A link to this website page is provided to those whose data is being processed by us. 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](#).

Unless subject to an exemption under the GDPR and DPA 2018, you have the following rights with respect to your personal data:

- The right to be informed – you have a right to know how your data will be used by us.
- 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.
- 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.
- 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.
- 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.
- 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.
- Rights in relation to automated decision making and profiling – this protects you in cases where decisions 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.

# Website Cookies

## Google Analytics

Our website uses Google Analytics, which is one of the most widespread and trusted analytics solutions on the web, for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

## Who To Contact

If you have any queries about this Privacy Policy or our use of your personal data, please contact the Group Scout Leader, Richard Bennett (richard.bennett (at) 26bristolscouts.org.uk).

## Version Number and Date

Data Privacy Policy/Notice Version 1.14, dated 3 September 2020