Southern Norwich District Privacy Notice/Policy



What is this privacy notice/policy?

This Data Privacy Notice/Policy describes the categories of personal data Southern Norwich District Scout Council process and for what purposes. Southern Norwich District Scout Council are 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 Notice/Policy applies to members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public who will make contact with Southern Norwich District Scout Council.

Who we are

Southern Norwich District Scout Council are a registered charity with the Charity Commission for England & Wales; charity number 1149767
The Data Controller for Southern Norwich District Scout Council is the Executive Committee who are appointed at an Annual General Meeting and are Charity Trustees. The Chair of the Charity Trustees is Jane Stafford

From this point on Southern Norwich District Scout Council will be referred to as "we".

Being a small charity, we are not required to appoint a Data Protection Officer.

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 membership system Compass. In the case of adult members and volunteers, data may also be provided by third parties, such as the England & Wales - 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, so that we are able to 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 we process your data by

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 through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will 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 Southern Norwich District Scout Council.
- 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 Southern Norwich District Scout Council
- 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 Southern Norwich Scout Council
- 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, Appendix A.

The Scout Association's Data Protection Policy can be found here and the Data Privacy Notice 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 Southern Norwich District Scout Council

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: https://www.scouts.org.uk/DPPolicy. The sharing of this data will be via the Online Scout Manager platform which is used by Southern Norwich District Scout Council to manage youth membership. The privacy and security notice for OSM can be found here: https://www.onlinescoutmanager.co.uk/security.html

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 Southern Norwich District Scout Council as well as with The Scout Association Headquarters as data controllers in common.

All data subjects

We will however share your personal information with others outside of Southern Norwich District Scout Council where we need 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.

Where personal data is shared with third parties we will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR and DPA 2018

How we store your personal data

We generally store personal information in the following ways:

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

Online Scout Manager - is the online membership system of Online Youth Manager, this system is used for the collection and storage of youth member personal data.

In addition adult volunteers will hold some personal data on local spreadsheets/databases.

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 for events are used 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.

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 (www.ico.org.uk).

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 decision 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

Forms related cookies

When you submit data through a form such as those found on our contact pages or comment forms, cookies may be set to remember you your user details for future correspondence.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

Who to contact

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact us by p.harris@norfolkscouts.org.uk

Appendix A

The following retention periods are analysed into the categories of data held within southern Norwich scout council, these are as follows:

Members and volunteer's data

Data Process	Data Type	Retention	Justification
Want to Join	Personal data	1 year after enquiry or until member joins, whichever is shorter	To keep them informed of their joining status
Joining – including the role and dates of joining	Personal and Sensitive data (special category)	10 years after leaving the data will be reduced to only include name, date of birth, awards, training records, events attended, roles and permits held and any complaints in summary format. This remaining data will be retained for 100 years.	The 10-year retention of all data is required to provide tenure and service records in the event an individual wants to rejoin. The 100 years retention of data is required for evidence requests from statutory agencies

Youth award registrations	Personal and Sensitive data (special category including citation)	6 months after the member turns 25	To retain their award registrations for the duration of the eligibility period
Youth award completions	Personal data and Sensitive data (special category including citation)	Permanent for basic data; name, county, award, membership number,completion date	Historic record of award completions
Adult award registrations	Personal and Sensitive data (special category including citation)	6 months after the registration	To retain their award registrations for the duration of the eligibility period
Adult award completions	Personal data and Sensitive data (special category including citation)	Permanent for basic data; name, county, award, membership number, completion date	Historic record of award completions
Research surveys	Personal and Sensitive data (special category)	18 months	To keep a collation of completing members and compare answers from the previous year
Scouts Experience Survey	Personal and Sensitive data (special category)	15 Years	To keep a collation of completing members and compare answers from the previous years
Vetting	Personal Data – Disclosure Certificate	6 months after issue	In line with DBS, Access NI and Disclosure

			Scotland Code of Practice
Safeguarding – Adult volunteer perpetrator	Personal and Sensitive data (special category)	Adult – 100 years after case closure. Will include all case notes, including those of witnesses and young person along with any litigation correspondence until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject to the joining data process retention period.	Required for required for evidence requests from statutory agencies
Safeguarding – Young person - Welfare	Personal and Sensitive data (special category)	Young Person – 7 years after last communication with the Young Person or Family.	Required for evidence requests from statutory agencies
Safeguarding – Young person perpetrator	Personal and Sensitive data (special category)	Young Person – 100 years after case closure. Will include all case notes, including those of witnesses and adult volunteers along with any litigation correspondence, until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject to the joining data process retention period.	Required for evidence requests from statutory agencies

Incident – personal injury (including sexual abuse/psychological damage)	Personal and Sensitive data (special category)	4 years after incident, or 4 years after alleged victim turns 18 if later	Fight a case – Limitation act 1980
Incident – not involving personal injury	Personal and Sensitive data (special category)	7 years after incident, or 7 years after alleged victim turns 18 if later	Fight a case – Limitation act 1980
Permit Assessments	Personal data	6 months after the permit expires	Required for permit renewals and queries

Donor's Data

Data Process	Data Type	Retention	Justification
	Personal Data	18 months post last donation	To keep an individual informed of their donation
Gift aid declaration Givers		6 years after the end of the year or accounting period that includes the last donation	
	Direct debit mandate	6 years after the end of the year or accounting period that includes the last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI
Partnerships	Personal Data	3 Years	To answer queries on the donations and maintain a record of partner donors

Event registrants and participants data

Data Process	Data Type	Retention	Justification
Ad-hoc events	Personal and Sensitive data (special category)	2 months after event. Scouting Young People attendance records will be retained for 100 years	Required for enquiries on the event and responding to incidents. The 100 years retention of data is required for evidence requests from statutory agencies

Annual events	Personal and Sensitive data (special category)	18 months after event for personal data, 2 months after event for sensitive data (special category). Scouting Young People attendance records will be retained for 100 years	To re-invite the guests to the same event in the following year. The 100 years retention of data is required for evidence requests from statutory agencies
International events	Personal and Sensitive data (special category)	5 years after event for personal data, 2 months after event for sensitive data (special category). Scouting Young People attendance records will be retained for 100 years	To re-invite the guests to the same event at the next cycle, which are every 4 years. The 100 years retention of data is required for evidence requests from statutory agencies
Event Permits and licenses	Personal data	6 months after the permit expires	To retain a record of permits and licenses held

Heritage data

Data Process	Data Type	Retention	Justification
Heritage Collection (includes business archive)	Personal data	Permanent	Required for historical, research and statistical purposes
Donor (entry and accession) records/registers	Personal data	Permanent	Required for historical, research and statistical purposes
Information gathered as a result of an enquiry	Personal data	2 years after enquiry is complete	Required to check for repeat enquiries
Object Exit Files and register	Personal data	Permanent	Required for historical, research and statistical purposes
Day books/Index Cards	Personal data	Permanent	Required for historical, research and statistical purposes
Loan In and Out files	Personal data	Permanent	Required for historical, research and statistical purposes