

# General Data Protection Policy

## Context and overview

### Key details

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| Policy prepared by:           | Ritchie Hicks |
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## Introduction

5th Colchester Scout Group needs to gather and use certain information about individuals.

These can include young people, parents, volunteers and other people the organisation has a relationship with, or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the Group's data protection standards, and to comply with the law.

## Why this policy exists

This data protection policy ensures 5th Colchester Scout Group:

- Complies with data protection law and follow good practice
- Protects the rights of young people, parents and volunteers
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

## Data

### How we gather your data

When you or your child becomes a member of 5th Colchester Scout Group **Beaver Colony**, you will be asked to complete a registration form. This form is stored by the Beaver Scout Leader Sue Wickens and kept private. If you enrol online, you'll be asked to submit the same information to a Google Form which will then be stored on Google Drive by Ritchie Hicks. The email address of the parent and first name of their child is then provided to the Assistant Beaver Scout Leader Ritchie Hicks, who stores the information on a contact list within Google Mail and uses it to send important emails and dates regarding the Beaver Colony's activities.

When you or your child becomes a member of 5th Colchester Scout Group **Cub Pack**, you will be asked to complete a registration form. The data on this form is then transferred to a third party application called Online Scout Manager (OSM) by Mike Acott CSL. OSM is used to send important emails and dates regarding the Cub Scout's activities. The application form is then shredded.

When you become a Leader or Occasional Helper at 5th Colchester Scout Group you will be required to provide your name, address, telephone number and date of birth. This information will be inputted and stored on the Scout Association 'Compass' website. In addition, you will be required to provide formal identification and undergo a Disclosure and Barring Service (DBS) check to ensure you are able to work with young people. You will be required to submit this information to DBS system on receipt of an email offering you to sign up to be checked. We do not store this information. Your contact telephone number and

email address will be made available to other leaders in the County so that they can contact you with important email updates.

## Data protection law

The Data Protection Act 1998 describes how organisations - including 5th Colchester Scout Group - must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

## People, risks and responsibilities

### Policy scope

This policy applies to:

- The head office of 5th Colchester Scout Group
- All volunteers of 5th Colchester Scout Group
- All contractors, suppliers and other people working on behalf of 5th Colchester Scout Group

It applies to all data that the Group holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of young people and volunteers who are members of the Group (or looking to join the Group within the next few months)
- Postal address of parents and volunteers
- Email addresses of parents and volunteers

- Telephone numbers of parents and volunteers
- Date of birth of young people and volunteers
- Any allergies, medical problems or disabilities that the young person may have
- Details of the young person's GP
- Details of the young person's religious beliefs

## Data protection risks

This policy helps to protect 5th Colchester Scout Group from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the Group uses data relating to them.
- Reputational damage. For instance, the Group could suffer if hackers successfully gained access to sensitive data.

## Responsibilities

Everyone who works for or with 5th Colchester Scout Group has some responsibility for ensuring data is collected, stored and handled appropriately.

Each person that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The Group Contact, Mike Acott is ultimately responsible for ensuring that 5th Colchester Scout Group meets its legal obligations.

The Group Contact is responsible for:

- Reviewing all data protection procedures and related policies, in line with an agreed schedule
- Arranging data protection training and advice for the people covered by this policy where required
- Handling data protection questions from Volunteers and anyone else covered by this policy
- Dealing with requests from individuals to see the data 5th Colchester Scout Group holds about them (also called 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the Group's sensitive data.
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly, where required and where this is not already carried out by a 3rd party software provider

- Evaluating any third-party services the Group is considering using to store or process data. For instance, cloud computing services.

## General Volunteers guidelines

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, Volunteers can request it from their line managers.
- 5th Colchester Scout Group will provide training to all volunteers to help them understand their responsibilities when handling data.
- Volunteers should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Two-factor authorisation should be used wherever possible.
- Personal data should not be disclosed to unauthorised people, either within the Group or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Volunteers should request help from their Section Leader or the data protection officer if they are unsure about any aspect of data protection.
- You must notify the Information Commissioner Office within 72 hours of any data breach, and you may also have to notify your young people, parents and volunteers.

## Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the data controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Volunteers should make sure paper and printouts are not left where unauthorised people could see them, like on a printer or open folder on a desk.
- Data printouts should be shredded and disposed of securely when no longer required.
- When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:
- Data should be protected by strong passwords that are changed regularly and never shared between Volunteers.

- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the Group's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

## Data use

Personal data is of no value to 5th Colchester Scout Group unless the Group can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, Volunteers should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. Ritchie Hicks can explain how to send data to authorised external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- Volunteers should not save copies of personal data to their own computers. Always access and update the central copy of any data.

## Data accuracy

The law requires 5th Colchester Scout Group to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort 5th Colchester Scout Group should put into ensuring its accuracy.

It is the responsibility of all Volunteers who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Volunteers should not create any unnecessary additional data sets.
- Volunteers should take every opportunity to ensure data is updated.
- 5th Colchester Scout Group will make it easy for data subjects to update the information 5th Colchester Scout Group holds about them. For instance, via the Group website.

- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

## Your right to access information we store about you (Subject Access Requests)

All individuals who are the subject of personal data held by 5th Colchester Scout Group are entitled to:

- Ask what information the Group holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the Group is meeting its data protection obligations

If an individual contacts the Group requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at [bookings@5thcolchesterscoutgroup.org.uk](mailto:bookings@5thcolchesterscoutgroup.org.uk). The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information. For example, requesting forms of photo identification such as a passport or drivers licence.

## Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, 5th Colchester Scout Group will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Scout Association and from the Group's legal advisers where necessary.

## Providing information

5th Colchester Scout Group aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used

- How to exercise their rights

To these ends, the Group has a privacy statement, setting out how data relating to individuals is used by the Group.

## Your right to rectification

Individuals have the right to have their information corrected if they believe it is factually inaccurate – this is known as the right to rectification.

## Your right to have data erased

The right to erasure is also known as ‘the right to be forgotten’. In certain circumstances, it allows people to instruct organisations to delete or remove their personal data.

For example, if our website holds photographs of members at camp and 20 years later the photo is still there, the individual can ask for the picture to be deleted.

## Your right to object

We do not sell information to any third parties, except the Scout Association. You have the right to object to the processing of your personal data at any time.

## How long we keep your data

We only keep your data for the period that you are a member of 5<sup>th</sup> Colchester Scout Group. Once you or your child leave the Group, the information is deleted and/or shredded.

## Third party applications and their GDPR policies

5th Colchester Scout Group use the following third party applications to store data or contact parents:

- Online Scout Manager - <https://www.onlinescoutmanager.co.uk/security.html>
- Compass - <http://scouts.org.uk/privacy-policy/>
- Google Mail and Google Drive - <https://privacy.google.com/businesses/compliance/>
- Disclosure and Barring Service - <https://www.gov.uk/government/publications/dbs-privacy-policies>