

Group Policy – GDPR Fair Notice

GDPR – Fair Processing Notice

Our Fair Processing Notice 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).

Who We Are:

1st Horndean Scout Group is a youth charity regulated as a member of the UK The Scout Association incorporated by royal charter, we are registered with the UK Charity Commission registration no. 302250. See <http://scouts.org.uk> for more information

Every year we hold an annual general meeting where members of the charity executive are elected, any parent of a youth members can stand to be in the executive at the AGM and every parent has the right to attend the Annual General Meeting.

We are based at 1st Horndean Scout HQ, Queens Crescent, Horndean, Hampshire, PO8 9NB.

Data Controllers

The Data Controller for the Scout Group and the alternative contacts are as follows:

Name	Role	Contact
Adrian Judge	Chairperson	chairman@horndeanscouts.co.uk
Richard Smith	Group Scout Leader	gsl@horndeanscouts.co.uk

Your Rights

We hold personal data on our members as we have a legitimate interest in requiring this information to ensure the wellbeing of all whilst in the care of the Scout Group. You have the right to object to how we process your/your child's personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we hold on you / your child. In addition, you have a right to complain to us and to the data protection regulator.

Please contact your section leader or the group scout leader for more information, in the first instance.

You can view and edit your personal information directly via the third-party online membership systems – Online Scout Manager (OSM) and Compass for leaders.

How We Gather Personal Information

The majority of the personal information we hold on you, is provided to us directly by parents / legal guardian or yourself in either paper form or via our online membership systems, 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) via The Scout Association and their provider – Atlantic Data Ltd.

Where a member is under the age of 18, this information will only be obtained from a parent / guardian and cannot be provided by the young person.

How We Use Your Personal Information

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We collect your personal and medical information for the protection of that Person whilst in the care of the Scout Group.

The collection of a person's religious / ethnicity data is utilised to respect their beliefs with regards to activities, food and holidays.

We process the data to have the ability to contact the member, parents and guardians, to inform them of meetings, events that the group itself may be running or attending.

Our Legal Basis for Using Your Personal Information

We only use your personal information where we have a legitimate interest that is permitted by the laws that protect your privacy rights. We only use personal information where:

- a) We need to use the information to comply with our legal obligations.
- b) We need to use the information to contact you, regarding meetings, events, membership fee's etc, i.e. for the day to day running of the group.
- c) it is fair to use the personal information in your interests, where there is no disadvantage to you – this can include where it is in our interests to contact you.

Sharing and Transferring Personal Information

We will only normally share personal information within our scout group leaders and executive members.

We will however share your personal information with others outside 1st Horndean where we need to meet or enforce a legal obligation, this may include, Waterlooville District Scouts, Hampshire County Scouts, The Scout Association (HQ) and its insurance subsidiary "Unity", local authority services and law enforcement, we will only share your personal information to the extent needed for those purposes.

If you move from the 1st Horndean, to another scout group or explorer group we will transfer your personal information to them with your agreement.

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

Sometimes we may nominate a member for an award, (such as Scouting or Duke of Edinburgh award) such nominations would require we provide contact details to that organisation.

Third Party Data Processors

1st Horndean, employs the services of the following third-party data processors: -

- a) The Scout Association via its membership system "Compass" which is used to record the personal information of leaders, adults and parents who have undergone a Disclosure and Barring Service (DBS) check via their provider – Atlantic Data Ltd.
- b) Online Youth Manager Ltd (Online Scout Manager/OSM) which is used to record the personal information, badge records, event and attendance records etc, we have a data processing agreement in place with online youth manager, more information is available at <https://www.onlinescoutmanager.co.uk/security.php>
- c) The Scout Association will have limited and controlled accessed to 1st Horndean Scout Group OSM personal data in the event of specific situations. This is outlined in the Data Sharing Agreement between OSM and The Scout Association, more information is available at <https://scouts.org.uk/OSM>. The Scout Association GDPR Policy and more information is available at <https://www.scouts.org.uk/about-us/policy/> .

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- d) 1st Horndean uses of Google G-Suites for management of the scout group, transfer and storage of any additional information and attendance lists for events. More information for G-Suites GDPR compliance can be found at <https://cloud.google.com/security/gdpr/>
- e) Parents completing the online waiting list form on the group website - <https://www.horndeanscouts.co.uk> will have their data processed and sent onto our Google G-Suites and OSM systems. This data is not stored on the website at any time. In addition, images may be used on our Facebook page or our Group Website.
- f) 1st Horndean uses SafetyCulture iAuditor cloud software for the management of the safety and security of the scout hut through its auditing tools. The system stores adult volunteers name and signatures through the inspection and compliance aspect of cloud software. More information for the Safety Culture GDPR compliance can be found at <https://safetyculture.com/safetyculture-and-gdpr/>
- g) Barclays Business Bank for the management of the 1st Horndean Scout Group bank account and financial management of the scout group. More information on the security and data compliance can be found at <https://www.barclays.co.uk/important-information/privacy-policy/>

How Long We Keep Your Personal Information For

We will retain your personal information, throughout the time you are a member of 1st Horndean.

When the Data Subject leaves we will delete it. If a Data Subject moves to another Scout Group, we will ask you before we share any data with the new Group. This also applies to Scouts moving to Explorer Scouts outside the 1st Horndean Scout Group.

We will also keep any Gift Aid Claim information for the statutory 7 years as required by HMRC (which may be beyond age 21).

Automated Decision Making

1st Horndean does not have any automated decision-making systems.

Transfers Outside the UK

1st Horndean will not transfer your personal information outside of the UK, with the exception where an Event is taking place outside of the UK and it is necessary to provide personal information 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.

Data Storage

1st Horndean is committed to the protection of your personal information.

We generally store personal information in one of two secure digital online database systems, where access to that data is restricted and controlled.

- a) **Compass** - is the online membership system of The Scout Association, this system is used for the collection and storage of adult personal data.
- b) **Online Scout Manager (OSM)** - is an online membership system run by Online Youth Manager Ltd, this is a secure membership database where we store the personal information of Adults and Youth members for the day to day running of the group.

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- c) **SecurityCulture iAuditor Cloud Portal** – is an online cloud auditing system, this system is used to collect inspection data and reporting tools for the safety and security management of the scout hut. Storage of adult personal names for auditing processes.
- d) **Barclays Business Banking Portal** – is an international banking company, this system is used to store banking information on parents of young people, adult volunteers and any paid staff - so that we are able to pay any staff that might be employed by us, receive funds through capitation/events/grants, refund funds to parents when required and collect gift aid from HMRC where donations have been made.

Printed Records and Event Data

Paper is still used within 1st Horndean to capture and retain some data for example the following:

- New joiners form
- Health and contact records update forms
- First Aid / Incident report forms
- Gift Aid Collection forms
- Events consent from parents
- Events coordination with event organisers
- Award notifications/nominations

In the case of joining forms, health and contact update forms, this information is securely held by the leader or group scout leader and transferred to our secure digital systems as soon as possible before the paper form is destroyed.

Gift Aid collection forms, will be securely held by the Groups Treasurer to aid in the collection of Gift Aid on your membership fee, we have a legal obligation to retain this information for 7 years after our last claim.

First Aid / Incident report form data is stored for 3 years or until the young person becomes 18 years of age.

Events

As a member of 1st Horndean it is hoped you will take up the opportunity to attend events and camps, where it is necessary to fulfil our legal obligations we will be required to potentially have a less secure means to access personal information, such as printouts of personal contacts and medical information, (including specific event contact forms), 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/camp.

Website Cookies

- a. **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.
- b. **Google Analytics** - This site 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. For more information on Google Analytics cookies, see the official Google Privacy information at <https://privacy.google.com/businesses/compliance>

We will ensure

- a) Transfer of paper is secure, such as physical hand to hand transfer.
- b) Paper forms are securely destroyed after use.

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- c) Secure destruction will be through a shredding machine or burned.
- d) Always keeping the paper records secure, especially when in transit, by using:
 - a. A lockable brief case.
 - b. A lockable filing cabinet if long term stored.
- e) If transferred to somebody, we will audit that they return them when the event is complete.

Change Log

Date	Version	Changed by	Comments
05/07/2018	1.0	Richard Smith/GSL	Initialisation of GDPR Fair Notice and GDPR Policy
17/06/2020	1.1	Richard Smith/GSL	Added 3 rd party data processing to include G-Suite Google package
06/06/2020	1.2	Richard Smith/GSL	Removed contact number for data controller Added 3 rd party data processing agreement with OSM/The Scout Association Added 3 rd party data processor with SecurityCulture iAuditor Safety Management Cloud System Added 3 rd party data processor with Barclays Bank Added Data Storage for the online SecurityCulture iAuditor Safety Management Cloud System Added Data Storage of specific personal data through the Barclays Business Banking Portal Added website cookies section of the GDPR Fair Notice
23/08/2020	1.3	Richard Smith/GSL	Updated the formatting and branding across GDPR Fair Notice and GDPR Policy document