# **Data Privacy Policy & Notice**

Approved by Trustee Board: 28th April 2025

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# **Version Control**

Version	Author/ Editor	Release Date
1.0	David Thorne	19 <sup>th</sup> May 2018
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4.0	Jan Moor	9 <sup>th</sup> January 2023
5.0	Gareth Mines	28 <sup>th</sup> April 2025

# **Definitions**

For the purposes of this policy, the following definitions apply:

- Group means Dringhouses (PC) Scout Group;
- Parent means parent, guardian or carer as appropriate for the young person concerned;
- **People** means members, parents of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public; and
- **Scout Association** means the headquarters of The Scout Association (charity number: 306101) and incorporates York Ebor Scout district and North Yorkshire Scout county

# **Data Privacy Notice: Dringhouses (PC) Scout Group**

Our Data Privacy Policy and Notice describes the categories of personal data Dringhouses (PC) Scout Group process and for what purposes. Dringhouses (PC) Scout Group are committed to collecting and using such data fairly and in accordance with the requirements of UK General Data Protection Regulations (UK GDPR), Data Protection Act 2018 (DPA), and the Scout Association's <a href="Data Protection Policy">Data Protection Policy</a>.

This Privacy Notice/Policy applies to all people who will make contact with Dringhouses (PC) Scout Group.

#### Who are we?

Our Scout Group, Dringhouses (PC) Scout Group, known as Dringhouses Scouts, 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. From this point on Dringhouses (PC) Scout Group will be referred to as "we" or "the Group" or "Dringhouses Scouts".

We are incorporated by royal charter and are regulated as a member of The Scout Association in the UK, (see <a href="https://www.scouts.org.uk">www.scouts.org.uk</a> for more information). We are also registered with the Charity Commission (registration number 1064151).

We hold an annual general meeting (AGM) every year within six months of our year end at the end of March. This is where members of the trustee board are elected. Any parent, guardian or carer of a youth member can volunteer to be on the executive committee at the AGM and every parent, guardian or carer has the right to attend the Annual General Meeting.

We are based at The Scout Hut, St Edward the Confessor Church, Tadcaster Road, YORK, YO24 1QG.

The trustee board is the data controller for the information we collect from you. Any personal data that we collect will only be in relation to the work we do with our members (both adult and youth) and through our relationship with supporters, donors and funders.

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

## Your personal data – what is it?

Personal data means any information about an identified or identifiable person. For example, an individual's home address, personal (home and mobile) phone numbers and email addresses, occupation, and so on can all be defined as personal data. Some categories of personal data are recognised as being particularly sensitive ("special category data"). These include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic and biometric information, and data concerning a person's gender or sexual orientation. The processing of personal data is governed by the UK GDPR and DPA.



# How we gather personal data

Most personal data we hold is provided to us directly by adult members or by parents 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).

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

# How do we process your personal data?

We use personal data for the following purposes:

- We collect personal and medical information for the protection of that person whilst in the care of the Group:
  - 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 can 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 and provide motor vehicle insurance for drivers.
  - Bank account details, so that we can collect subscriptions and event payments, and reimburse legitimate out of pocket expenses
  - Name and address details so that we can 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. Anonymous, aggregated data is also reported to The Scout Association for statistical purposes.
  - Health records so that we can make suitable arrangements based on members' medical needs.
  - o Criminal records checks to ensure Scouting is a safe space for young people and adults.

# What is the legal basis for processing your/your child(ren)'s personal data?

We comply with our obligations 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 and organisational 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 to publish 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, or their parents 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 people of news, events, activities and services being run or attended by the Group and of the wider Scout District of York Ebor and Scout County of North Yorkshire
- to ensure and evidence your suitability if volunteering for a role in Scouting
- to contact a nominated person in the event of an emergency
- to ensure volunteers have and maintain the correct qualifications and skills.

We use special category 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.

# **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 with The Scout Association for the purpose of managing safeguarding cases. The privacy and security notice for The Scout Association can be found here: <a href="https://www.scouts.org.uk/about-us/policy/data-protection-policy/">https://www.scouts.org.uk/about-us/policy/data-protection-policy/</a>. The sharing of this data will be via the Online Scout Manager platform which is used by the Group to manage youth membership. The privacy and security notice for OSM can be found here:

https://www.onlinescoutmanager.co.uk/security.html



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#### **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 as joint data controllers.

#### 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 organisations outside of Scouting 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) and such nominations require us to provide contact details to that organisation.

Where personal data is shared with parties outside of Scouting we will seek assurances that your personal data will be kept confidential and we will review the organisation's privacy notice.

## How we store personal data

We are committed to the protection of your personal data.

We generally store personal data in the following ways:

## **Scouts membership system**

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

#### Online Scout Manager (OSM)

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

Only authorised adult volunteers have access to the data, and this is restricted to show as little data as they need to fulfil their role. For example, a Beaver Scout Leader cannot access the records of a member of the Scout section.

Parents can view and edit the information held about members using the parent portal to securely access and edit this data. Parents can also consent to the Group's use of photos via the parent portal, (please see the Photography and Social Media section below).

#### **Google Cloud Drive**

For some events personal data will be stored in spreadsheets and stored in the Groups' Google Cloud Drive.



#### **Printed records**

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.

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

# Third party data processors

The Group, employs the services of the following third-party data processors:

The Scout Association via its adult membership system which is used to record the personal data of leaders, adults and parents who have undergone a Disclosure and Barring Service (DBS) check.

Online Youth Manager Ltd (Online Scout Manager) which is used to record the personal data, badge records, event and attendance records etc. We have a data processing agreement in place with online youth manager, more information is available at <a href="https://www.onlinescoutmanager.co.uk/security.html">https://www.onlinescoutmanager.co.uk/security.html</a>

**GSuite (Google Inc.)** used to store details of adult members of the Group, send and receive emails, share calendars for public and internal events, share files internally and store data.

GoCardless (Payment Processor) for processing Direct Debit payments for subs and events.

**HSBC Bank** for processing receipt of subscriptions or fees and payment of out-of-pocket expenses to leaders/members.

**HMRC** for processing Gift Aid claims.

**GoDaddy** hosts the website. Limited personal data is shared to enable the creation of user accounts; contact forms may also contain limited personal data and these are held securely on the site until transferred to OSM or the membership system.

#### Transfers outside the UK

The Group will not transfer your personal data outside of the UK. The only exception is 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. We will always notify data subjects prior to sharing data outside of the UK.



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# How do we protect personal data?

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for as long as necessary for the purpose for which it was collected.

## How long do we keep your personal data?

We will retain your personal data, throughout the time individuals are an adult or youth member of Dringhouses Scouts.

For youth members, to fulfil our legal obligations for insurance and legal claims, we will retain:

- full personal data for a period of up to one year after members have left the Group
- limited information (just name, and attendance records) for a period of up to 15 years (or until the age 21)
- The Scout Association may retain personal data relating to adults indefinitely.

For parents, we will keep any Gift Aid claim information for 7 years as required by HMRC.

We will only keep personal data for those that have left the group for longer than a year if specifically requested by parent for the purposes of a young person potentially rejoining or being able to pass records onto another group.

# Your rights and your personal data

Adults and the parents of youth members as data subjects have the right to object to how we process their personal data. Members also have the right to access, correct, sometimes delete and restrict the personal data we use. In addition, they have a right to complain to us and to the Information Commissioner's Office (<a href="www.ico.org.uk">www.ico.org.uk</a>).

Unless subject to an exemption under the UK GDPR or DPA, data subjects have the following rights with respect to their personal data, which be exercised by a parent for under 18s:

- The right to information: We must give you certain information about how we collect and process information about you. This information needs to be concise, transparent, understandable and accessible.
- The right of subject access: If you want a copy of the personal data we hold about you, you have the right to make a subject access request (SAR) and get a copy of that information within 30 days.
- The right to rectification: You have the right to ask us to correct mistakes in the personal data we hold about you.
- The right to erasure (right to be forgotten): You can ask us to delete your personal data if it is no longer needed for its original purpose, or if you have given us permission to process it and you withdraw that permission (or where there is no other lawful basis for processing it).
- The right to restrict processing: In certain circumstances where, for lawful or legitimate purposes we cannot delete your relevant personal information or if you do not want us to delete



it, we can continue to store it for restricted purposes. This is an absolute right unless we have a lawful purpose to have it that overwrites your rights.

- The obligation to notify relevant third parties: If we have shared information with other people or organisations, and you exercise your right to rectification, erasure, or restriction of processing then we must tell the other person or organisation (unless this is impossible or involves effort that is out of proportion to the matter).
- The right to data portability: This allows you to transfer your personal data from one data controller to another.
- The right to object: You have a right to object to us processing your personal data for certain reasons, as well as the right to object to processing carried out for profiling or direct marketing.
- The right to not be evaluated on the basis of automatic processing: You have the right not to be affected by decisions based only on automated processing which may significantly affect you.
- The right to bring class actions: You have the right to be collectively represented by not-for-profit organisations.

# **Further processing**

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

#### **Breach notification**

We will notify people of any breach of their personal data via email within 72 hours of our identifying the breach. Breach notifications relating to under 18s will be sent to the OSM primary contact.

## Website

Our website <a href="www.dringhousesscouts.org.uk">www.dringhousesscouts.org.uk</a> is used to provide information to parents and members about the how the Group is run and the activities that are provided. Links to the Group's policies and The Scout Association website are provided as is access to the OSM Parent Portal.

The site also has several forms which are used for the collection of information related to new adult and youth members.

#### **Cookies**

Cookies are in use on our website.

#### 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 your user details for future correspondence.



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#### 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 our website.

Our 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 page: <a href="https://privacy.google.com/businesses/compliance/">https://privacy.google.com/businesses/compliance/</a>.

As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on our site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or looking at the <u>About Cookies website</u> which offers guidance for all modern browsers.

#### **Contact forms**

There are several contact forms on the website, these all function in the same way:

- Data entered into these forms and submitted is stored on the website and emailed to a
  distribution list with a limited membership (for the processing of the request entered in the form).
- Information collected by the form includes data which the individual submitting the form has not entered, this information is captured automatically and is required in the event of malicious posts, to enable the originator to be identified.
- Name, email address, phone number, subject and message are all entered by the submitter of the form.
- The form also captures, IP address of sender; link to domain information for the IP address of the sender; and webpage that the form was submitted from.
- Emails received from forms are deleted once actioned.

# Photography and social media

Promoting Scouting is important to the Group, as such it is in the interest of all members to advertise the movement through the use of appropriate positive images.

Social media is used as a means of promoting our brand and our activities. Leaders have undertaken specific training for handling these tools and guidance is available to them from The Scout Association. Our public Facebook page, Instagram, X (formerly Twitter) and YouTube accounts allow us to quickly share news and photos that we think are appropriate to a wider audience. As these are used as promotional tools neither is restricted or "closed" in any way.

When we are away at events, and even at our weekly meetings, it is common for photos to be taken and published on our social media feeds. While a selection of these photos may be posted to our social media channels, the majority will be kept indefinitely as a historical record of the Group's activities. Images are

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stored securely in our Google Drive in a section only visible to registered users (who will have their accounts approved by the Group's leadership team). We know from feedback that parents find these photographs interesting and reassuring.

We embed videos from our official YouTube channel using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. To find out more please visit YouTube's <u>embedding videos information page</u>.

The Group also has a closed Facebook page which all leaders, members of the Support Team and parents of current members can access. This closed group enables communication between all members of the Facebook group and is used to share events, photos, questions and answers and information that is deemed useful and positive for our members. The moderators of the group approve the membership and ensure the content is pertinent to Scouting and is appropriate for the consumption of all. The membership of the closed Facebook group is reviewed quarterly and members removed if they are no longer active with the Group. However, Facebook is not a secure medium and we cannot control how Facebook and its users use and process any images posted there.

We will always endeavour to:

- Never publish personal details with any photo/image/video that would make the subject of the photograph identifiable
- Consider the content of all photo/image/video for good taste before publication
- Only publish photos/images relating to Scouting
- Remove any photo/image/video that breaches these guidelines as quickly as possible after it is brought to our attention - please use the contact form to inform administrators of any inappropriate content.

While we will endeavour to keep to the above guidelines, we cannot control the legal right of third-party photographers to take pictures taken in a public place and publish them to websites and other publications that are outside of our control.

Parents can record their consent for the Group's use of photographs through OSM parent portal.

We understand that some people do not want photographs of their child published on social media. If that is the case, then you can refuse consent for your child to be photographed, and this will not affect their membership of the Group. However, for the reasons given above, we cannot ensure that they will not appear in the background of either our photos or other people's photos which may then get posted on the internet, although we will use reasonable efforts to ensure that this does not happen.

#### **Contact details**

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Lead at <a href="mailto:DataLead@DringhousesScouts.org.uk">DataLead@DringhousesScouts.org.uk</a>



You can contact the Information Commissioners Office on 0303 123 1113 or via email <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.