



1st Markfield Scout Group

GDPR, Data & Retention Policy

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Table of Contents

<i>What is this privacy notice/policy?</i>	2
<i>Who we are</i>	2
<i>The data we may process</i>	2
<i>The lawful basis we process your data by</i>	3
<i>Our retention periods</i>	3
<i>Joint control of membership data</i>	7
<i>Sharing your information</i>	9
<i>How we store your personal information</i>	9
<i>Further Processing</i>	10
<i>How we provide this privacy notice</i>	10
<i>Your rights</i>	10
<i>Website Cookies</i>	10
<i>Who to contact</i>	11

What is this privacy notice/policy?

This Policy describes the categories of personal data 1st Markfield Scout Group process and for what purposes, it also includes information pertaining to the retention of different types of personal data and for how long.

1st Markfield Scout Group 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 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 1st Markfield Scout Group.

Who we are

1st Markfield Scout Group are a registered charity with the Charity Commission for England & Wales; charity number 1042586.

The Data Controller for 1st Markfield Scout Group is the Trustee Board who are appointed at an Annual General Meeting and are Charity Trustees. Where possible we have access to a volunteer assuming the role of Data Lead.

From this point on 1st Markfield Scout Group will be referred to as “we”.

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 systems. 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. 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).

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.⁸
- 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, where such photographs place the data subject as the focal point of the shot. 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 1st Markfield Scout 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 1st Markfield Scout 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 1st Markfield Scout Group
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting.

Our retention periods

The following retention periods are analysed into the categories of data held by 1st Markfield Scout Group.

The retention period is applicable at the point where the relationship has finished, for example where a member has left the organisation.

The same piece of data may be held by different sections/teams and for different purposes. It will therefore be covered by the retention policy for each purpose, and so retained by the organisation for the longer of the stated periods.

Young people

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins, whichever is shorter	Required for placing individual on a waiting list for a place
Joining	Personal and Sensitive data (special category)	2 Years after the young person leaves	Required for enquiries on membership
Events	Personal and Sensitive data (special category)	2 months after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
Incident – No medical intervention	Personal and Sensitive data	Until the young person is 21 or 3 years, whichever is greater	Legal claims raised against the incident
Training records	Personal data	2 Years after the young person leaves	Required for any re-joins to connect them back to their training records
Attendance register	Personal data	18 months	Required to complete annual registration review Required to prove attendance for Gift Aid reclamation
HQ Youth award registrations	Personal and Sensitive data (special category including citation)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period
HQ Youth award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion HQ will retain the data permanently for basic data; name, county, award, membership number, completion date	To retain their award registrations for the duration of the eligibility period Historic record of award completions

Adult volunteers

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until adult volunteer joins	Required for placing individual on a waiting list for a place
Joining	Personal and Sensitive data (special category)	2 Years after the adult volunteer leaves	Required for enquiries on membership
Adult Information Form	Personal and Sensitive data (special category)	12 months or until approval checks and "Getting started" training is complete, whichever is shortest	Required to assist in the appointment process
Identity Checking Form	Personal data	Until ID data has been submitted to DBS/PVG and the vetting process is complete	Required to verify that the identity has been checked.
Events	Personal and Sensitive data (special category)	2 months after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
Incident – No medical intervention	Personal and Sensitive data	Until the adult volunteer is 21 or 3 years, whichever is greater	Legal claims raised against the incident
Training records	Personal data	2 Years after the young person leaves	Required for any re-joins to connect them back to their training records
Appointments Advisory Committee notes	Personal data	18 months	Required to review any training needs of adult volunteers
Adult award registrations	Personal and Sensitive data (special category including citation)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period

Adult award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion HQ will retain the data permanently for basic data; name, county, award, membership number, completion date	To retain their award registrations for the duration of the eligibility period Historic record of award completions
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Parents

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins	Required for placing individuals young person on a waiting list for a place
Joining	Personal data	2 Years after the young person leaves	Required for enquiries on membership
One off events	Personal data	2 months after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
Incident – No medical intervention	Personal data	Until the young person is 21 or 3 years, whichever is greater	Legal claims raised against the incident

Donors

Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	1 Year	To keep you informed of your donation
	Gift aid declaration	6 Years after donation	HMRC Tax Audit
	Direct debit mandate	6 Years after last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI

Notes:

Where possible, personal and sensitive (special category) data should be anonymised as soon as appropriate if they are to be retained for analysis or statistical purposes.

The Scout Association's Data Protection Policy can be found [here](#) and the Data Privacy Notice [here](#). The retention of safeguarding data is handled by The Scout Association as part of the safeguarding policies and no data should be retained locally. This should be in line with The Scout Association 'Young People First', 'Yellow Card'.

Any incidents that have required medical intervention should be reported to The Scout Association for alignment to an incident category and to manage the process.

As a Subject Rights Request (SRR) can be made by any type of individual it is represented here. Data from an SRR will be retained for 7 years to allow for answers to queries and complaints raised in relation to the SRR.

Joint control of membership data

The Scout Association and 1st Markfield Scout Group process the data of members, parents/guardians of youth members, volunteers on our membership databases. Volunteer data is processed between the local Scout Groups and The Scout Association. Information The Scout Association and 1st Markfield Scout Group hold about volunteers may include the following:

- name and contact details
- length and periods of membership and volunteer service (and absence from membership and service)
- details of training you receive
- details of any youth badges and awards
- details of your experience, qualifications, occupation, skills and any awards you have received
- details of Scouting events and activities you have taken part in
- details of next of kin or parents details (in the case of youth members)
- age/date of birth
- details of any health conditions
- details of disclosure checks
- any complaints we have received about the member
- details about your role(s) in Scouting
- details about your membership status
- race or ethnic background and native languages
- religion
- nationality

Processing Activities

The following is a list of common data processing activities for members, parents/guardians of youth members, volunteers data on the membership systems. This includes an indication of which entity carries out this activity which is shared with the other.

Processing Activity	Description	Processing entity
Scout Member capture	Initial data load of a new Scout Member onto the membership database	1 st Markfield Scout Group
Scout Member disclosure check	Disclosure checks for any adult Scout Members that require them	1 st Markfield Scout Group initiate The Scout Association complete the check
Scout Member operational administration	This may include: Scout Member data updates Maintaining training record Events attended Permits approved Badges awarded	1 st Markfield Scout Group and The Scout Association
Scout Member disciplinary	Scout Member disciplinary detail capturing where a Scout Member has breached POR or any other Scout policy	1 st Markfield Scout Group initiate The Scout Association involved if severity meets a policy threshold
Scout Member leaving	The updating of an individual's membership status post leaving the association.	1 st Markfield Scout Group
Scout Member data reporting	Reporting on trends and monitoring data to be able to demonstrate The Scouts impact and to attract funding (this may include optional special category data of the Scout Members)	The Scout Association 1 st Markfield Scout Group may access special category data for Census and local Scouting delivery
Scout Member Training	The addition of mandatory training for Scout Members, where applicable	The Scout Association
Scout Member roles definition	The definition of Scout Member roles on the membership databases	The Scout Association

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 1st Markfield Scout Group.

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 1st Markfield Scout Group as well as with The Scout Association Headquarters as independent data controllers.

All data subjects

We will however share your personal information with others outside of 1st Markfield Scout Group 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 may require us to provide contact details and award nomination details, such as citations to that organisation. We may also shared data on award nominees for National Honours Awards, including the same data as above.

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 information

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. The Online Scout Manager privacy and security notice can be found here: <https://www.onlinescoutmanager.co.uk/security.html>.

In addition adult volunteers may 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.

Google Analytics

This site uses Google Analytics which is one of the most widespread and trusted analytics solution 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.

Who to contact

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact us by visit www.1stmarkfieldscoutgroup.org.uk/contact-us.