

BNPOLO013 – Data Protection Policy

Introduction - Privacy and data protection as a key policy for Scouting

Bradford North District Scout Council is aligned with The Scout Association's commitment to protecting personal information, this has been adopted as a [key policy for Scouting](#). It is important to note that as Data Controllers, local Scout Groups are directly responsible for any personal data they process and must therefore ensure that they are aware of their responsibilities under the law.

1. Purpose of this Data Protection policy and what it covers

This policy sets out Bradford North District Scout Council's approach to protecting personal data and explains your rights in relation to how we may process personal data. More detail in respect of how we process and protect your data is provided below, in particular in section 5.

2. Some Important Definitions

'**We**' means Bradford North District Scout Council

'**Local Scouting**' and '**Scout unit**' mean Bradford North District Scout Groups,.

'**Personal Data**' is defined in section 3

'**Processing**' means all aspects of handling personal data, for example collecting, recording, keeping, storing, sharing, archiving, deleting and destroying it.

'**Data Controller**' means the person nominated by the District Scout Council to represent The District insofar as we process personal data in the ways described in this policy. '**Data processor**' means anyone who processes personal data under the data controller's instructions.

'**Subject Access Request**' is a request for personal data that an organisation may hold about an individual. This request can be extended to include the deletion, rectification and restriction of processing.

'**Compass**' is The Scouts Association Adult web-based membership system.

3. What is personal data?

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 ("sensitive personal 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 sex life or sexual orientation.

4. How does data protection apply to local Scouting?

Data protection legislation applies to local Scouting in the same way as it does to other organisations. Scout units are created and run as independent charities and insofar as they collect and store personal data about members and young people, for example, they are data controllers and must adhere to the law.

5. What type of personal data do we collect and why?

Members of Bradford North District Scout Council's Board of Trustees and its subcommittees, other committees and working groups, hold information as set out in 5.1. This information is held to communicate and carry out any necessary checks to make sure that a volunteer can work with young people. We also have a responsibility to keep information about volunteers, both during their membership and afterwards (due to our safeguarding responsibilities and to help us if they leave or re-join).

5.1 Members and volunteers

We benefit from the service of a large number of members giving their time to Scouting. We hold personal data (including sensitive personal data) about members and volunteers on our membership database. We believe it is important to be open and transparent about how we will use personal data. Information we may hold includes but not limited to the following:

- Name and contact details
- Length and periods of service (and absence from service)
- Details of training
- Details of any experience, qualifications, occupation, skills, and any awards received
- Details of next of kin
- Age/date of birth
- Details of any health conditions
- Details of disclosure checks
- Any complaints we have received about the member
- Race or ethnic background and native languages
- Religion
- Nationality

6. Conditions for collecting personal data

6.1 Keeping to the law

We must keep to the law when processing personal data. To achieve this, we have to meet at least one of the following conditions:

- Consent has to be obtained for us to use information for one or more specific purposes
- We need to process the information to meet the terms of any contract entered into • Processing the information is necessary to keep to our legal obligations as data controller
- Processing the information is necessary to protect individuals interests
- Processing the information is necessary for tasks in the public interest or for us as the data controller to carry out our responsibilities
- Processing the information is necessary for our legitimate interests (see below)

Also, information must be:

- Processed fairly and lawfully
- Collected for specified, clear and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- Processed securely

6.2 Information that we share

We may have to share personal data within appropriate levels of the Association and with local Scouting, as long as this is necessary and directly related to roles within Scouting. We do not share personal data with companies, organisations and people outside the Association, unless one of the following applies;

- We have consent to do so.
- If we have a request to supply information to others for processing, we make sure that they are adhering to GDPR and Data Protection Act 2018.
- For safeguarding young people or for other legal reasons.

7. Keeping personal data secure

Everyone who handles personal data must make sure it is held securely to protect against unlawful or unauthorised processing and accidental loss or damage. We take appropriate

steps to make sure we keep all personal data secure, and we make our volunteers aware of these steps. The following is general guidance for members and volunteers in local Scouting.

- Only store personal data on networks; drives or files that are password protected and regularly backed up.
- Any paper records containing personal data should be kept secure in line with data protection rules and procedures. Any movement or transfer of paper records must be done securely.
- Personal data should not be downloaded to mobile devices such as laptops and USB sticks unless absolutely necessary. Access to this information must be password protected and the information should be deleted immediately once no longer required.
- All personal data must be kept secure when travelling.
- Personal data relating to members and volunteers is held on Compass or other specific databases, which have, appropriate security in place.
- When sending larger amounts of personal data by post, a registered mail or a courier is used. Memory sticks should be encrypted.
- Passwords should not be shared with anyone.
- Different rights of access should be allocated to users depending on their need to access personal or confidential information.
- In the event of any breach it should be reported to the Data Controller

All volunteers to undertake training to ensure that they are aware of the above rules This policy refers to all personal data and details held on and processed in the Legal Jurisdiction of The United Kingdom.

8. Data Retention

Information is kept for different periods of time for different purposes as required by law or best practice. Data is stored in line with our Data Retention Policy.

9. Rights to accessing and updating personal data

Under data protection law, individuals have a number of rights in relation to their personal data.

(a) The right to information: As a data controller, we must give a certain amount of information about how we collect and process information about the individual. This information needs to be concise, transparent, understandable and accessible.

- (b)** 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. Any requests to be sent to The Data Controllers, no fee will be charged. **(c)** The right to rectification: You have the right to ask us, as data controller, to correct mistakes in the personal data we hold about you.
- (d)** 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). **(e)** 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.
- (f)** The obligation to notify relevant third parties: If we have shared information with other people or organisations, and you then ask us to do either (c), (d) or (e) above, as data controller we must tell the other person or organisation (unless this is impossible or involves effort that is out of proportion to the matter).
- (g)** The right to data portability: This allows you to transfer your personal data from one data controller to another.
- (h)** 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.
- (i)** 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.
- (j)** The right to bring class actions: You have the right to be collectively represented by not-for-profit organisations.

10. Further information and contacts

Data protection controller contact details

Enquiries.info@bradfordnorthscouts.org.uk

Subject access requests

Subject access requests for data held by Bradford North District Scout Council can be requested by email at info@bradfordnorthscouts.org.uk, by telephone on 0300 1021536 (Option 3) or in writing to: 5 Coleridge Gardens, Idle Bradford BD10 9RP.