

Hertfordshire County Scout Council 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

Hertfordshire County Scout Council otherwise known as Hertfordshire Scouts or HCSC is a member of The Scout Association, which is incorporated by Royal Charter; we are registered with the UK Charity Commission in England (302606) and Scotland (SC039650). See <http://scouts.org.uk> for more information on our charitable status.

Your rights

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 data protection regulator.

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

You can view and edit your personal information directly on our online membership systems Online Scout Manager and Compass.

We have appointed a data protection officer ("DPO") who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO at the following contact details.

Contact details

Our full details are:

Full name of legal entity: Hertfordshire County Scout Council

Name of DPO: Michael Shurety

Email address: admin@hertfordshirescouts.org.uk

Postal address: County Office, Well End Activity Centre, Well End Road, Borehamwood, Herts, WD6 5PR

You have the right to make a complaint at any time to your country's supervisory authority for data protection issues. In the United Kingdom, this is the Information Commissioners Office (ICO), details of which can be found via the following link: www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance using the contact details above.

How we gather personal information

The majority of the personal information we hold on you, is provided to us directly by yourself or by parents / legal guardian 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).

Where a member is under the age of 13, this information will only be obtained from a parent / guardian and cannot be provided by the young person, however we will accept and potentially record any personal information, such as about any ongoing medical treatment from any member no matter their age.

How we use your personal information

We collect your personal and medical information for the protection and identification of that person whilst in the care of Hertfordshire Scouts, this could be while attending an event as part of their usual group or individually, or attending one of our training courses or expeditions in the same way.

We process the data to have the ability to contact the member, parents and guardians, to inform them of meetings, events and training courses that Hertfordshire Scouts itself may be running or attending that may be relevant to the you.

Our legal basis for using your personal information

We only use your personal information where 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 legitimately to contact with you, regarding meetings, events, training courses etc. i.e. for the day to day running of Hertfordshire Scouts
- 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 about products or services within scouting.

Sharing and transferring personal Information

We will only normally share personal information within our County Team and Executive members.

We will however share your personal information with others outside Hertfordshire Scouts where we (or an affiliate processing your data on our behalf) are required to do so by law, obligation, regulation or legal proceedings. This may also include organisers of events and camps the member is attending, such as The Scout Association or other Scout Counties where we are jointly organising and activity etc. so they may fulfil any 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 may also share personal detail with The Scout Association and its insurance subsidiary "Unity", along with any other insurance company or insurance agent Hertfordshire Scouts has contracted to provide services.

We would also share details in response to a valid, legally compliant request by a relevant public authority or law enforcement agency. We would also share details during an emergency when we believe physical safety is at risk if not sharing the details would cause harm or distress. In all cases we will only share personal information to the extent needed for those purposes.

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

We will never sell your personal information to any third party for any reason without your explicit consent.

Third Party Data Processors

Hertfordshire Scouts employs the services of the following third-party data processors: -

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.

Unity Insurance (The Scout Association Insurance company)

Online Youth Manager Ltd (**Online Scout Manager**) 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>

Microsoft – Office 365 products - occasionally used for secure transfer of limited personal information

Dropbox inc occasionally used for secure transfer of limited personal information for events.

Google occasionally used for secure transfer of limited personal information for events.

How long we keep your personal information for

We will retain your personal information, throughout the time you are a member of Hertfordshire Scouts, one of its Districts or Groups, or for the relevant duration needed for administration of an Event, Activity, Expedition or Training Course Hertfordshire Scouts is organising that you are taking part in.

We may retain your full personal information for a period of six months after you have left Hertfordshire Scouts, its Districts or Group, and after the end of any Event, Activity, Expedition or Training Course, and in a much more limited form (just name and attendance records) for a period of up to 15 years (until age 21) to fulfil our legal obligations for insurance and legal claims.

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

Hertfordshire Scouts does not have any automated decision-making systems.

Transfers outside the UK

Hertfordshire Scouts 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

Hertfordshire Scouts 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.

Compass: - is the online membership system of The Scout Association, this system is used for the collection and storage of Adult personal data.

Online Scout Manager 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.

Printed records and Event data

Paper is still used within Hertfordshire Scouts to capture and retain some data for example the following: -

- Event sign up forms
- Health and contact records forms for events.
- Gift Aid Collection forms.
- Events consent from parents.
- Events coordination with event organisers.
- Award notifications/nominations

In the case of these forms, this information is securely held by the leader or event organiser, and transferred to our secure digital systems as soon as possible (where this is allowed) before the paper form is destroyed.

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

Events

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.

We will ensure:

- a) Transfer of paper is secure, such as physical hand to hand transfer or registered post.
- b) Paper forms are securely destroyed after use.
- c) Secure destruction will be through a shredding machine or securely burned.
- d) Always keeping the paper records secure, especially when in transit, by using:
 - i. A lockable brief case.
 - ii. 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.

Photography

The law on image use and GDPR needs further clarification, the position Hertfordshire Scouts is as follows: -

Photographs / images (which can be classed as personal information when the subject is identified) of yourself or your child may be taken during activities and be used within a Scouting context and in particular publicity material for example Scouting publications and the media. Images may be published to official Scout websites and scouting affiliated social media and our public display boards in the parish centre (but will never identify individuals in line with Scout Association guidelines).

We cannot ask for explicit consent "Yes/No" for photo as consent presumes that it can be revoked, as is your right to do so under the GDPR regulations.

Under GDPR consent is invalid if people cannot easily withdraw consent, which would be the case with publishing to any publicly accessible system, therefore if you do not wish your son/daughter to appear in these then please confirm, in writing, to the County Administrator, and we will not publish any photographs of you or your child on a public forum such as social media from that point forward, we will be unable to confirm full removal of images and photographs from the historical record online or otherwise stored.

Please note that the group cannot control or stop images being taken by other individuals, parents or organisations not connected with Hertfordshire Scouts.