

1st Bishopthorpe Scout Group



Data Privacy & Protection Policy

Approved by Trustee Board: 19/05/2025

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Version Control

Version	Author/ Editor	Changes	Release Date
1.0	Alex Bishop	Aligned to Dringhouses Privacy Policy v4.0 and Protection Policy v3.0	19/05/2025

Data Privacy Notice: Bishopthorpe Scout Group

Our Privacy and Fair Processing Notice describes the categories of personal data Bishopthorpe Scout Group process and for what purposes. Bishopthorpe 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 (which also adheres to The Scouts [Data Protection Policy](#)).

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 Bishopthorpe Scout Group.

Who are we?

Our Scout Group is 1st Bishopthorpe Scout Group. 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 Bishopthorpe Scout Group will be referred to as “we” or “the Group”.

We are incorporated by royal charter and are regulated as a member of The Scout Association in the UK, (see www.scouts.org.uk for more information).



We hold an annual general meeting (AGM) every year within six months of our Year end at the end of August. This is where members of the charity Trustee Board (our trustees) are elected. Any parent, guardian or carer of a youth member can volunteer to be on the Trustee Board 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, Appleton Road, Bishopthorpe, York, YO23 2RF.

The Group 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 organisation, 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. 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 GDPR and Data Protection Act (DPA) 2018.

How we gather personal data

The majority of the personal data we hold is provided to us directly by adult members or by parents, guardians or carers 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, guardian or carer 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 Scout 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 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 and provide motor vehicle insurance for drivers.
- Bank account details, so that we are able to reimburse legitimate out of pocket expenses
- Bank account details, so that we are able to collect subscriptions and event payments
- Gift Aid Declaration, so that we can reclaim tax you have paid to help fund the group's activities.
- Name and address details so that we are able to 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.
- 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.

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

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. 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 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 you 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 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 Bishopthorpe Scout Group
 - 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/guardians with The Scout Association Headquarters for the purpose of managing safeguarding cases. The privacy and security notice for The Scout Association can be found here: <https://www.scouts.org.uk/DPPolicy>. The sharing of this data will be via the Online Scout Manager (OSM) 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>

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 Bishopthorpe Scout Group as well as with The Scout Association Headquarters as data controllers in common.

All data subjects

We will, however, share your personal information with others outside of Bishopthorpe Scout 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 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 would require us to provide contact details to that organisation.

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 personal data

We are committed to the protection of your personal data.

We generally store personal data in the following ways:



Scout Association Digital Systems

Formally known as Compass this is the online membership system of The Scout Association, this is used for the collection and storage of adult volunteer personal data. This includes sensitive personal data.

Online Scout Manager (OSM)

This 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 execute their role. For example: a Beaver Scout Leader cannot access the records of a member of the Scout section.

Parents and carers can view and edit the information held about members using the parent portal to securely access and edit this data. Parents and guardians can also consent to the Groups use of photos via the parent portal, (Please see the [Photography and Social Media](#) section below).

Anyone with data held in OSM or is responsible for the data of members who have data held in OSM are required to ensure this is kept up to date. Any changes to personal information such as changes to addresses, phone numbers and health conditions such as allergies is required to be updated as soon as possible. A 6 monthly check and confirmation in OSM is also required to ensure that the correct data is held.

It is very important that OSM contains correct and up to date information as this is essential for ensuring the safety of Group members. This information includes: at least 2 contact details of a responsible adult, all the fields in the 'essential information' section and details of the member's doctors surgery. For essential information, it is required that 'None' is entered into the text boxes if the fields are not relevant to a member.

Google Cloud Drive

For some events personal data will be stored in spreadsheets and stored in The Group's Google Cloud Drive. This data shall be stored only whilst it is needed and in line with the requirements specified in section of this policy '**The personal data we hold**'.

Printed records

Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example:

- 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. When paper records are no longer needed, they shall be securely destroyed e.g. using a shredder.



In addition, adult volunteers will hold some personal data on local spreadsheets/databases. This practice is to be avoided so far as is practicable to do so. Where the benefits of holding such local data are deemed to outweigh the risks to the group it shall only be stored for as long as it is required and deleted when it is no longer needed. Adult volunteers shall ensure that such data is shared with the group as needed and ensure that it is not disclosed to unauthorised 3rd parties.

Third Party Data Processors

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

The Scout Association via its adult membership digital system which is used to record the personal data of leaders, adults and parents, guardians or carers 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 <https://www.onlinescoutmanager.co.uk/security.html>

GSuite (Google Inc.) used to store Annual General Meeting Documents, the group's policies and other related documents. No personally identifiable information is currently stored in here.

GoCardless (Payment Processor) for processing direct debit payments for subs and events.

Lloyd's 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 provides the Group's website's domain name and hostinger.com 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 Scout Association Digital Systems.

Transfers outside the UK

Bishopthorpe Scout 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.

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 Bishopthorpe Scout Group.



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, carers and guardians, 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/carer for the purposes of a young person potentially rejoining or being able to pass records onto another group) or if there is a legal reason to do so (e.g. accident reports).

Your rights and your personal data

Adult members and the parents, carers or guardians 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 (www.ico.org.uk).

Unless subject to an exemption under the GDPR and DPA 2018, data subjects have the following rights with respect to their personal data:

- **The right to be informed:** a right to know how your data will be used by our Scout Group
- **The right to access:** members can ask the Group to share the data held related to them
- **The right to rectification:** this just means that members can update their data if it's inaccurate or if something is missing. Members can view and edit their personal data directly on our online membership systems Online Scout Manager and Scout Association Digital Systems
- **The right to erasure (the right to be forgotten):** this means that members have the right to request that we delete any personal data held related to them. There are some exceptions, for example, some information shall be retained for legal reasons
- **The right to restrict processing:** if members think there's something wrong with the data being held about them, or they aren't sure if we are complying with the rules, they can restrict any further use of that data until the problem is resolved
- **The right to data portability:** this means that if members ask us we will have to share their data with them 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:** members can object to the ways their data is being used. This should make it easier to avoid unwanted marketing communications and spam from third parties.

Rights in relation to automated decision making and profiling – this protects you in cases where decisions are being made about you based entirely on automated processes rather than a human input.

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 our users of any breach of data via email within 72hrs of identifying the breach.

Website

<https://1stbishophorpescoutgroup.com/> is used to provide information to parents, guardians or carers 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 web site are provided as is access to the Parent Portal, via a link to Online Scout Manager (OSM).

The site also has the capability for users to enter data via the use of forms which are used for the collection of information related to new adult and youth members

Cookies

One cookie is in use on our website 'wpEmojiSettingsSupports' this is used to determine if a user's browser can display emojis properly and is classified as a necessary cookie.

Forms related cookies

When you submit data through a form, cookies may be set to remember your user details for future correspondence.

Third Party Cookies

The Group's website does not currently implement any third-party cookies.

Contact Forms

The website has the capability for users to submit information via forms, forms function in the following way:

Data entered into these forms and submitted is stored on the web site 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, 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. Guidance is available to leaders on the use of such tools from The Scout Association

(<https://www.scouts.org.uk/volunteers/running-things-locally/local-media-and-member-communications/social-media-toolkit/>).

The Group has a closed Facebook page which all leaders, adults who support the group and parents, guardians or carers 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 Scout 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 by accessing the 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.

Data Protection

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. 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 policy is designed to ensure that The Group complies with its obligations under the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA 2018) and adheres to The Scouts Data Protection Policy. We conform to the following eight data protection principles:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:
 - a. at least one of the conditions in [Schedule 2](#) is met, and
 - b. in the case of sensitive personal data, at least one of the conditions in [Schedule 3](#) is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The personal data we hold:

Data description	Personal data included	Stored using	Retention policy	Responsible officer
Information about our members	Contact information, badge records, activity records, <i>(Includes sensitive personal data)</i>	Email (emails which are destroyed once data entered into OSM) Online Scout Manager Joining and Moving up spreadsheet	Retained whilst a current member. A subset of data is retained for 21 years or until the member is 21 year old	Section Leader, Group Joining Co-Ordinator



Data description	Personal data included	Stored using	Retention policy	Responsible officer
	Contact information, DBS status, awards details, permit details (<i>Includes sensitive personal data</i>)	Paper forms or emailed forms (which are destroyed once entered into Scout Association Digital Systems) The UK Scout Association's online system	2 years after membership ceases in order to support continuity should the person reapply for membership	Group Administrator or Group Volunteer Lead
	Appointments forms and references	Email and Word Documents Also, sent to District Appointments Secretary by email	Stored until the members role gains full status and then destroyed	Group Volunteer Lead
	Details of ID and name and address and NI number of members (<i>Includes sensitive personal data</i>)	Atlantic Data System (3 rd party system)	ID and most other sensitive personal data is destroyed after check is completed. The fact the check took place is stored Indefinitely and will contain personal data	Group Administrator or Group Volunteer Lead
Information about Safeguarding incidents	Contact information and information regarding the nature of any allegation, the status and outcome of the investigation	Paper, County email and Electronic Files	Indefinitely	Group Volunteer Lead
Information about accidents and near misses	Contact details and nature of accident and action taken	Paper, website, District email and electronic files and possibly The Scout Association	21 years or until the member is 21 years old, potentially indefinitely	Section leader (must also send to) Group Volunteer Lead and Group Safety Officer



Data description	Personal data included	Stored using	Retention policy	Responsible officer
		depending on the severity of the incident	depending on the severity of the incident	
Information about our events	Contact details, next of kin information, medical conditions and special diets. <i>(Includes sensitive personal data)</i>	Online Scout Manager	OSM record archived for 7 years unless there was a medical incident and then kept for 21 years or until affected member is 21 years old	Event Leader/ Group Volunteer Lead
Information about general enquirers	Contact information and nature of enquiry, which may contain personal data	email system and spreadsheet stored on web site and in G-Drive	Indefinitely	Group Volunteer Lead/ Group Joining Coordinator
Information about complaints	Contact information and nature of complaint and outcomes which may contain personal data	email system	Indefinitely	Group Volunteer Lead or Group Secretary
Information about people registered for our website	Contact information to enable online shopping	Wordpress (3 rd Party provider)	Indefinitely, unless the individual requests removal	Website Manager
	Names of users of the website admin tools	Wordpress (3 rd Party provider)	Indefinitely, unless the individual requests removal	Website Manager



Data description	Personal data included	Stored using	Retention policy	Responsible officer
Bank details of our members and their parents/ guardians and our suppliers	Name, address, bank sort-code and account number	Not stored, other than by 3 rd party merchant (GoCardless)	See merchant's policy	
	Name and bank account may appear on the bank statement where payments have been made online or by cheque	Stored by the Bank (Lloyd's) (a 3rd party merchant) Statements downloaded to the G-Drive will have sensitive personal data removed, some personal data will remain as necessary to reconcile the accounts	See merchants' policy Financial records will be stored for 7 years as required by law.	Group Treasurer
Information about those members paying subs	Name, house number and postcode as part of gift aid claim to HMRC	Spreadsheet (G-Drive) Online Scout Manager HMRC	7 years , as required legally for financial data	Group Treasurer
Information about drivers of any vehicle hired by the Group so that they are insured	Name and driving history of drivers	Unity Insurance (3 rd party)	See 3 rd party's policy	

For completeness, we also hold the following information which is not categorised as Personal Data but has the following retention policies applied:

Data description	Retention policy	Responsible officer
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Finance – purchase ledgers, record of payments made, invoices, bank paying in counterfoils, bank statements, remittance advices, correspondence regarding donations, bank reconciliation.	7 years	Group Treasurer
Finance – Receipt cash book and sales ledger	7 years	Group Treasurer
Finance - Fixed assets register	Indefinitely	Group Treasurer
Finance – Deed of covenant/Gift aid declaration and legacies	7 years after last payment made	Group Treasurer
Buildings – Leases	15 years after expiry	Group Secretary
Buildings – Documentation regarding plant and machinery	Until 1 year after disposal	Group Secretary
Buildings – records of major refurbishments, warranties, planning consent, health & safety files.	13 years after completion of project	Group Secretary
Trustee's minutes	Indefinitely	Group Secretary
Annual accounts and annual reports	Indefinitely	Group Secretary
Investment and insurance policy records	7 years after disposal	Group Treasurer
Insurance policies	Indefinitely	Group Secretary
Employer's Liability insurance certificate	40 years	Group Secretary
Health and safety records	3 years	Group Secretary



Contract with customers, suppliers or agents, licensing agreements, rental/hire purchase agreements, indemnities and guarantees and other agreements or contracts	6 years are expiry or termination	Group Secretary
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Our Security Policies

The following security policies will apply to the storing of personal data as outlined in this policy. These security policies are mandatory. Further guidance on how to implement these policies may be found on the National Cyber Security Website - <https://www.ncsc.gov.uk/files/Charity-Guide-v3.pdf>

Overarching principles:

- **Need to know** – We only give people access to the data that they need to carry out their role. If people change roles, we review access accordingly.
- **Passwords** – We use systems that force complex password complexity. Passwords should be set once and kept until you think the password may have been compromised.
- **Commercially available software** – where possible we use third party software to store personal data (as software-as-a-service), where the software is regularly tested and patched for security vulnerabilities.
- **Volunteers** – We ensure our volunteers are made aware of their data protection obligations through training which is delivered online by the Scout Association and through the use of Group Policies and processes, which each volunteer must read and confirm understanding of.
- **Transporting data** – We transport data using physical media only if absolutely necessary and then using encrypted media only. Some data will be transmitted by email, if this includes personal data the files will be password protected. Printed media will be securely stored while in transit.
- **We keep people informed** – we tell people why we are collecting their data and how we use it, at the point in time we collect it.

Physical storage

- **Limiting storage** – We limit the amount of personal data we physically store to the absolute minimum. Only those with a need to know will have access to the data.
- **Locked** – Physical documents with personal data will be store in a locked cabinet in the Scout Hut. Those stored at volunteers houses will be stored in a locked cupboard or drawer. Appropriate measures should be taken when travelling to ensure that personal information is not lost.
- **Secure Disposal** – Physical documents will be securely destroyed when no longer needed.



Volunteer equipment

- **Anti-Virus** – A virus scanning service must be installed on all devices and regularly checked.
- **Encryption** – The Group cannot impose restrictions on equipment belonging to adult volunteers, guidance is not to store any data locally and instead to keep everything securely in the Google Drive file store.
- **Removable storage** – Removal devices that will contain personal data should be encrypted using Bitlocker or similar encryption.

Volunteer emails

- **Restriction** - Our volunteers should use The Group's 'official' email addresses as their primary method for receiving, storing and sending of emails, and always when they are transmitting personal data.
- **Virus, Malware and Phishing protection** – All emails will be scanned for virus, malware and phishing using the tools built into G-Suite
- **IT security** - We rely upon the IT security provisions of our preferred supplier (Google Inc.) to provide an adequate level of security for our needs.

Third parties

- **Third party processing** – Other than the Scout Association, Online Scout Manager, The Scout Online System and Google Inc (GSuite), we limit the use of third parties to process personal data collected by Bishopthorpe Scout Group and only do so where we have the express permission of the Group Trustee Board.
- **Third party compliance** – We ensure third parties we contract with to store personal data comply with the principles of this policy, have an information security policy in place and ideally hold an information security standard (such as ISO 27001 or Cyber Essentials).
- **Limiting exports** – When exporting data from third party systems (e.g. The Scout Online System, Online Scout Manager), we only export the data we need for the purpose we need it for and only keep the exported data for as long as required to complete the purpose for which it was downloaded.

Consent

Where we do not have a lawful basis to hold or process data, we will seek the express consent of individuals to hold data about them. This will be by specific and unambiguous statements that must be opted-into on any forms (electronic or otherwise) and systems. In some circumstances due to the organisation of the Scouts, we ask our members to ensure they have express consent for the data they are submitting to us.



For example:

"I consent to my name, date of birth, t-shirt size and information about my special diet to be used for the purposes of administering the event by ensuring that the correct security wristband is assigned, t- shirt ordered and meal options provided. We will not use this data for any other purpose than this event, except in aggregate to provide statistics for historical reference. We will delete this data one year after the event ends."

Data Subject Access Requests

Should a member of Bishopthorpe Scouts or a member of the public request a copy of any personal data which Bishopthorpe Scouts holds, then the following process should be followed:

- The individual should write to our Data Lead (datalead@1stbishopthorpescoutgroup.com) outlining the personal data they are seeking to obtain.
- Our Data Lead will acknowledge the request by email.
- Our Data Lead will seek to verify the identity of the individual and that they are lawfully entitled to request a copy of the personal data. This may involve asking for information such as a membership number, date of birth, address, or documentary evidence.
- Our Data Lead will collate the data requested, noting that we cannot provide data held by other organisations such as the Scout Association, Online Scout Manager, the Scout District. The data should be carefully analysed to ensure it does not refer to any other individuals, in which case it should be redacted.
- Within 30 days of the receiving the request, our Data Lead will provide the data to the individual. This will normally be by email.
- There will be no charge.

For more information about our legal obligations, refer to the ICO website.

Right to erasure (Right to be forgotten)

Should a member of Bishopthorpe Scout Group or a member of the public wish for their personal data to be erased, then the following process should be followed:

- The individual should write to our Data Lead (datalead@1stbishopthorpescoutgroup.com) outlining the personal data they are seeking to erase.
- Our Data Lead will consult the Group Chair and Group Volunteer Lead to make a decision as to whether the request should be processed. Guidance from the ICO should be followed. Whilst Bishopthorpe Scout Group will not seek to refuse the request unreasonably, it has a number of statutory obligations to comply with and uses personal data as part of its vetting and safeguarding procedures.



- If it is deemed that the data shall be deleted, then our Data Lead will confirm to the individual the timescales involved and instruct the necessary responsible officer to delete it.

Correcting inaccurate personal data

Should a member of Bishopthorpe Scout Group or a member of the public believe that information that we hold about them is inaccurate, they should either update the information themselves, (using their own access to OSM, the parent portal or Scout Association Digital Systems), or if this is not possible write to our Data Lead (datalead@1stbishopthorpescoutgroup.com) outlining the inaccuracy. Our Data Lead and/or the Group Secretary will then seek to correct the data and confirm back to the individual, normally by email.

Reporting a breach

A breach is defined as any event which “leads to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data”. If a breach occurs, our Data Lead will be immediately informed (datalead@1stbishopthorpescoutgroup.com).

Our Data Lead (in consultation with the Group Chair and Group Volunteer Lead) will need to consider if the breach is likely to “result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage”. If it does, the ICO should be informed within 72 hours of the breach being discovered.

If the breach results in a high risk to the rights of the individuals involved, they should also be informed directly.

All data breaches will also be reported to the District Secretary.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact our Data Lead at Datalead@1stbishopthorpescoutgroup.com

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

