

General Data Protection Regulations 2016 draft policy document with respect to
Lisburn Cathedral Scout Group and their partnered Squirrel Drey and Explorer Scout Unit.

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Definitions

- Personal Information – information that personally identifies an individual – e.g. Full name and address.
- Personal Sensitive Information – information of a sensitive nature e.g. medical or religious information
- Leaders – includes Scout Leaders, Section Assistants, Adult Helpers, Skills Providers, Trainers, Assessors and Active Support members
- Group Executive – Trustees of the charity who include Ex-officio members, elected members and section leaders.
- Members – includes youth members, their parents / guardians and Adult Leaders
- Lisburn Cathedral Scouts – Lisburn Cathedral Scout Group and their partnered Squirrel Drey and Explorer Scout Unit.
- Lisburn Scouts – Lisburn and District Scout Council
- The Squirrel Association - The Northern Ireland Squirrel Association
- ScoutsNI – Northern Ireland Scout Council
- Compass – The Scout Associations adult members database
- Primary Contact – The person, (normally a parent / Guardian) who supply the group with personal information

Relevant Parties

- Lisburn Cathedral Scout Group – Registered with The Charity Commission for Northern Ireland: NIC103714
- Lisburn Cathedral Squirrels – partnered Squirrel Drey operated by Lisburn Cathedral Scout Group on behalf of The Northern Ireland Squirrel Association
- The Northern Ireland Squirrel Association – Registered with The Charity Commission for Northern Ireland: NIC100541
- Lagan Valley Explorers – Lisburn Cathedral Unit – partnered Explorer Scout Unit operated by Lisburn Cathedral Scout Group on behalf of Lisburn and District Scout Council
- Lisburn and District Scout Council – Registered with The Charity Commission for Northern Ireland: NIC103868
- Northern Ireland Scout Council - Registered with The Charity Commission for Northern Ireland: NIC103542
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- The Scout Association - Registered with the Charity Commission for England and Wales. Charity number 306101

Overview of GDPR

What is GDPR and why do we need it?

As technology develops and our private data is being used and shared in countless new ways, people are understandably becoming increasingly worried about security.

There are two key reasons why GDPR was introduced – to bring all EU member states under one common regulation, and to update regulations to reflect our new digital age.

Different countries in the EU follow different rules and regulations when it comes to data sharing and privacy, which can get quite confusing when data is being shared between people and companies in different countries. GDPR will be enforced across all 28 EU member states, meaning everyone is following the same rules. Post Brexit the UK will continue to follow the same rules.

What data does it protect?

When people talk about technology and digital developments, there's always a focus on data. But what data do they mean? GDPR aims to protect any personal data a company holds about you – including your name, address, email address, images, social networking accounts, IP address or medical history.

It will also cover more sensitive data such as your sexual orientation, your genetics, your political views or any trade union memberships.

How will it affect UK charities?

Essentially, GDPR will affect everyone in all 28 EU member states, from businesses and charities big and small, to customers and consumers.

When it comes to implementing GDPR, the biggest changes will be seen by businesses rather than consumers – since they're the ones who will have to adjust the way they handle data to align with the new legislation.

There are hefty penalties for those who don't comply, including a fine of up to €20 million or 4% of the company's total profit. Any data breach also needs to be reported to the relevant authorities within 72 hours, and if there's a risk involved to the data subject (i.e. the people the data concerns) they'll have to inform their customers too.

How will GDPR affect me?

While businesses and charities will have to make changes to their data policies in preparation for the new regulations, consumers don't have to do anything in particular to prepare.

That said, individual consumers will probably still notice some changes. You'll probably find that when you buy products online or sign up to newsletters, there will be more obvious checkboxes relating to how the company can use your data – for example to send you emails, or share data with a third party.

However, GDPR also gives you a number of 'rights' when it comes to your data, including:

The right to be informed – you have a right to know how your data will be used by a company.

The right to access your personal data – you can ask any company to share with you the data they have about you!

The right to rectification – this just means you can update your data if it's inaccurate or if something is missing.

The right to erasure – this means that you have the right to request that a company deletes any personal data they have about you. There are some exceptions, for example, some information can be held for legal reasons.

The right to restrict processing – if you think there's something wrong with the data being held about you, or you aren't sure a company is complying to rules, you can restrict any further use of your data until the problem is resolved.

The right to data portability – this means that if you ask, companies 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 other companies, such as your bank details when applying for a loan.

The right to object – you can object to the ways your 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.

Whether or not you exercise your new rights is up to you – the main thing to remember is that they're there if you need them.

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

Lisburn Cathedral Scout Group is a youth charity, incorporated by royal charter, we are registered with the Charity Commission for Northern Ireland and we are members of and regulated by The Scout Association. See <http://scouts.org.uk> for more information

Every year, usually in June, we hold an annual general meeting where members are elected to the Group Executive. Those elected serve on the executive committee and, along with section leaders and Ex-officia members are the trustees of the group. Only Trustee's are allowed to vote on financial matters.

Any eligible parent of a youth member can decide to stand for the executive at the AGM and every parent has the right to attend the Annual General Meeting. Eligibility to be a trustee is governed by Charity Law. Details can be obtained from the GSL or AGSL.

We are based in Lisburn Cathedral, Lisburn, Northern Ireland.

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.

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. Data is also share with us from The Northern Ireland Squirrel Association and Lisburn and District Scout Council with specific regard to youth members of our partnered sections – Lisburn Cathedral Squirrels and Lagan Valley Explorers – Lisburn Cathedral Unit respectively. In the case of an adult member, data may also be provided by third party governmental departments and reference agencies, such as Department for Justice - AccessNI-

Where a member is under the age of 18, this information will normally only be sourced from a parent / guardian (Normally the Primary Contact) and cannot normally be provided by the young person, with the exception of a youth member wishing to apply for Department of Justice AccessNI clearance after they turn 17 years old.

How we use your personal information

We collect a members personal and medical information for the protection of that Person whilst in the care of the Scout Group.

The collection of a person's religion data is necessary to respect their beliefs with regards to activities, food and holidays. We process the data to have the ability to contact the member, parents and guardians, to inform them of meetings, events that the group itself may be running or attending and to ensure we can inform parents and guardians of pertinent information.

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 use personal information where:

- a) We need to use the information to comply with our legal obligations.
- b) We need to use the information to contact with you, regarding for the day to day running of the group. E.g.meetings, events, collection of membership fee's etc.
- c) it is fair to use the personal information in your interests, where there is no disadvantage to you – this may include where it is in our interests to contact you about products or services relevant to scouting.

Sharing and transferring personal Information

We will only normally share personal information within Lisburn Cathedral Scouts - including our partnered Squirrel Dray and Explorer Scout Unit, with Leaders and Executive members. This is offer a 3 way exchange of data, including data regarding members of the Squirrel Dray to Leaders within Lisburn Cathedral Scout Group and to Explorer Scouts who are Young Leaders as well as data to and from our Partnered Explorer Scout Unit.

We will however share your personal information with others outside Lisburn Cathedral Scout Group where we need meet or enforce a legal obligation, this may include Lisburn Scouts, County Antrim Scouts, ScoutsNI and The Scout Association and its insurance subsidiary "Unity", local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.

If you move from Lisburn Cathedral Scouts to another scout group or explorer unit we may transfer your personal information to them.

We may also share personal and medical information to ensure the safety of youth and adult members during activities, camps and events with external activity providers.

We will never sell your personal information to any third party.

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

Third Party Data Processors

Lisburn Cathedral 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 Department of Justice AccessNI Criminal Records Check.

The Northern Ireland Scout Council (ScoutsNI) via its Activity Permits Scheme (MAPS) which is used to record the personal information of Adult and Youth members who have obtained an Adventurous Activity Permit.

Online Youth Manager Ltd (Online Scout Manager) which is used to record "Members" personal and medical 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>

Lisburn and District Scouts – in respect of adult and youth members personal and medical information of Explorer Scouts and Explorer Leaders.

Microsoft Onedrive and Dropbox for storage and transfer of limited personal information

How long we keep your personal information for

We will retain personal and personal sensitive information from a members registration until the September after they cease to be a member. It will normally be checked and updated at registration day (usually in September) If membership is not renewed we will delete Personal sensitive information and most personal information.

We will keep any Gift Aid Claim information which includes personal identifiable information for the statutory 7 years as required by HMRC

We will keep relevant limited information including information recorded in an accident book and executive minutes regarding incidents, accidents.

We will keep limited information to maintain and record group social history.

Automated decision making

Lisburn Cathedral Scout Group does not have any automated decision-making systems.

Transfers outside the EU

Lisburn Cathedral Scout Group 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. Generally such an event will have its own data collection form which will be securely held and disposed of after the event.

Data Storage

Lisburn Cathedral Scout Group is committed to the protection of your personal information.

We generally store personal information in secure digital format, 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.

Microsoft Office for Charities - Onedrive – Password protected files are stored online where access is restricted and controlled.

Printed records and Event data

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

- New joiners form.
- New joiners waiting lists.
- Health and contact records update forms.
- Gift Aid Collection forms.
- Events consent from parents.
- Events coordination with event organisers.
- Award notifications/nominations

In the case of Joining forms, Health and contact update forms, this information is securely held by the leader and transferred to our secure digital systems as soon as possible. The paper form is then destroyed?

Gift Aid collection forms, will be securely held by the Groups Treasurer or scanned and stored electronically to aid in the collection of Gift Aid for monthly membership fee's, we have a legal obligation to retain this information for 7 years after our last claim.

Events

As a member of Lisburn Cathedral Scout Group it is hoped you will take up the opportunity to attend events and camps, where 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.

Rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available, we will generate or collect specific event contact forms. 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.
- b) Attendance records are separate from personally identifiable contact and medical information
- c) Always keeping the paper records secure and sealed unless needed.
- d) If transferred to somebody, we will audit that they return them when the event is complete.
- e) Paper forms are securely destroyed after use.
- f) Secure destruction will be through a shredding machine or securely burned.

Awards

Sometimes we may nominate a member for national award, (such as the Queen's Scout Award) such nominations would require we provide contact details to the awarding organisation, this is usually sent via signed for post or by sharing a password protected document electronically.

Collection and Storage of information on behalf of 3rd Parties

Because LCSG operate a partnered Squirrel Drey and Explorer Unit, We collect and store personal Information on behalf of The Northern Ireland Squirrel Association and Lisburn and District Scout Council in order to operate the partnered Drey and Explorer Unit. Personal and Personally sensitive information is held by the Leaders of these sections and shared as necessary with other Leaders and Executive Members within the three organisations. These details may be held on Online Scout Manager or in an alternative electronic or a paper format as detailed above.

Charity Commission Annual Report

Personal information of Leaders and Executive members may be contained in our Annual Report. This is limited to their name and post held.

Non personally identifiable information.

The Group operated a closed facebook group page and a website where photo's are published to record the history of the group. It is normal policy to ensure that individuals are not personally identified in any photos.

Photo's with an Individuals Identity

On occasions where an individual will be identified in text accompanying a photo, permission will be requested to publish the information, either via a paper form or using electronic means. This will be stored for a minimum of 3 years or until the subject turns 22 years old, whichever is longer.

Data Breach

In the unlikely event of a data breach either directly from ourselves or via one of our 3rd party processors, we will comply with our statutory obligations and inform those effected at the earliest opportunity.

Personal Access Request – If you wish to know what data we hold on you, you should approach the Data Controller with your request either in person or via email. Your request will be processed ,as soon as we have established you have a legal right to the information held, in accordance with our statutory obligations.

The name and contact details of the Data Controller can be obtained from the Group Scout Leader.

Summary

Lisburn Cathedral Scout Group, The Northern Ireland Squirrel Association – Lisburn Cathedral Squirrel Drey and Lisburn and District Scout Council – Lisburn Cathedral Explorer Scout Unit keep and share Data to allow the smooth and safe operation of its programmes and to ensure their members operate in a safe and controlled environment. All data held is normally provided from the family's primary contact and can be reviewed by them directly using our 3rd party processor Online Scout Manager. The Data is kept in accordance with internal policies to ensure your data is safe and secure. After a member leaves, only limited data is kept to fulfill legal requirements or to ensure a history of the group can be maintained.

A copy of this policy is available on the group's website – <http://www.cathedralscouts.com>