

# 1<sup>st</sup> Halton (RAF) Scout Group

**BEAVERS**

**cubs**

  
**Scouts**

**EXPLORERS**

## **1<sup>st</sup> Halton(RAF) Scout Group Data Privacy Policy**

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The logo for Beavers, featuring the word "BEAVERS" in a stylized, multi-colored font.The logo for Cubs, featuring the word "cubs" in a bold, green, lowercase font.The logo for Scouts, featuring a purple fleur-de-lis symbol above the word "Scouts" in a purple font.The logo for Explorers, featuring the word "EXPLORERS" in a blue, uppercase font.

## 1. Definitions

<b>Data Protection Laws</b>	means any law, statute, subordinate legislation regulation, order, mandatory guidance or code of practice, judgment of a relevant court of law, or directives or requirements of any regulatory body which relates to the protection of individuals with regard to the processing of Personal Data to which a Party is subject including the Data Protection Act 1998 or Data Protection Act 2017 (as applicable) and the GDPR.
<b>GDPR</b>	means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
<b>Personal Data</b>	Has the meaning in Data Protection Laws
<b>Data Controller</b>	Is the Group Executive Committee

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The logo for Beavers, featuring the word "BEAVERS" in a stylized, colorful font with a yellow and red border.The logo for Cubs, featuring the word "cubs" in a bold, green, lowercase font.The logo for Scouts, featuring a purple fleur-de-lis symbol above the word "Scouts" in a purple, serif font.The logo for Explorers, featuring the word "EXPLORERS" in a blue, uppercase, sans-serif font.

## 2. Introduction

**1st Halton (RAF) Scout Group** needs to gather and use certain information about individuals in the course of its activities. This information can include personal data from children, suppliers, activities contacts, volunteers and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the organisation's data protection standards and to comply with the law.

## 3. Why this policy exists

This data protection policy ensures 1st Halton (RAF) Scout Group and its volunteers:

- Complies with Data Protection Law and follow good practice
- Protects the rights of leaders, children and other individuals involved with the group
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

## 4. Data protection law

The **Data Protection Laws** describe how **1st Halton (RAF) Scout Group** must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. The **Data Protection Laws** are underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Processed in accordance with the rights of data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

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## 5. Policy scope

This policy applies to:

- All sections of 1st Halton (RAF) Scout Group
- All leaders and volunteers of 1st Halton (RAF) Scout Group
- All contractors, suppliers and other people working on behalf of 1st Halton (RAF) Scout Group

It applies to all data that the group holds relating to identifiable individuals. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- any other information relating to individuals

## 6. Data protection risks

This policy helps to protect **1st Halton (RAF) Scout Group** from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the group uses data relating to them.
- **Reputational damage.** For instance, the group could suffer if hackers successfully gained access to sensitive data.

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## 7. Responsibilities

Everyone who works for or with **1st Halton (RAF) Scout Group** has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **group executive** is ultimately responsible for ensuring that **1st Halton (RAF) Scout Group** meets its legal obligations.
- The **Exec as a whole, are** responsible for:
  - Keeping the group updated about data protection responsibilities, risks and issues.
  - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
  - Arranging data protection training and advice for the people covered by this policy.
  - Handling data protection questions from leaders and anyone else covered by this policy.
  - Dealing with requests from individuals to see the data **1st Halton (RAF) Scout Group** holds about them (also called 'subject access requests').
  - Checking and approving any contracts or agreements with third parties that may handle the organisation's sensitive data.
  - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
  - Evaluating any third-party services the group is considering using to store or process data. For instance, OSM and Dropbox.
  - Approving any data protection statements attached to communications such as emails and letters.
  - Addressing any data protection queries from journalists or media outlets like newspapers.
  - Where necessary, working with other leaders to ensure marketing initiatives abide by data protection principles.

Although some of these tasks may be delegated within the exec as defined in an exec meeting with minutes to show a delegation of authority.

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## 8. General leader guidelines

- The only people able to access data covered by this policy should be those who **need it for their role**.
- Data **should not be shared informally**. When access to confidential information is required, volunteers can request it from their leaders or the executive committee.
- **1st Halton (RAF) Scout Group will provide training** to all volunteers to help them understand their responsibilities when handling data.
- Volunteers should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used** and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the group or externally.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Volunteers **should request help** from their section leader or the GSL/Exec if they are unsure about any aspect of data protection.

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## 9. Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Volunteers should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between volunteers.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services (Such as OSM and DropBox)**.
- All laptops have anti-virus and anti malware installed. Data should **never be saved directly** to tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

## 10. Data use

An individual's personal data is of no intrinsic value to **1st Halton (RAF) Scout Group** unless or until the data is used in the course of its activities. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, volunteers should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**.
- Personal data should **never be transferred outside of the European Economic Area** without appropriate contractual safeguards in place.
- Volunteers should not save copies of personal data to their own computers.
- Always access and update the central copy of any data. This will be defined by the executive separately to the policy as the technology for this may change over time.

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## 11. Data accuracy

The law requires **1st Halton (RAF) Scout Group** takes reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort **1st Halton (RAF) Scout Group** should put into ensuring its accuracy.

- Data will be held in **as few places as necessary**. Leaders should not create any unnecessary additional data sets and only create data in the approved places, i.e. OSM.
- Leaders should **take every opportunity to ensure data is updated**. For instance, by confirming a family's details when they call.
- **1st Halton (RAF) Scout Group** will make it **easy for data subjects to update the information 1st Halton (RAF) Scout Group** holds about them.
- Data should be **updated as inaccuracies are discovered**. For instance, if a child or their family can no longer be reached on their stored telephone number, it should be removed from the database.
- Parents will be asked each term to re-affirm their details to confirm their accuracy.

## 12. Subject access requests

All individuals who are the subject of personal data held by **1st Halton (RAF) Scout Group** are entitled to:

- Ask **what information** the group holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the group is **meeting its data protection obligations**.

If an individual contacts the group requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by post or email, addressed to the data controller at [1sthaltonscouts@gmail.com](mailto:1sthaltonscouts@gmail.com). The data controller can supply a standard request form, although individuals do not have to use this.

The Exec will aim to provide the relevant data within 30 days.

The exec committee will always verify the identity of anyone making a subject access request before handing over any information.

## 13. Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, **1st Halton (RAF) Scout Group** will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the exec and from the group's (may be referred to District or County) legal advisers where necessary.

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## 14. Providing information

**1st Halton (RAF) Scout Group** aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, the group has data privacy statements, setting out how data relating to volunteers, clients, suppliers and prospective children is used by the organisation.