

## Privacy and Data Protection Policy

### Background

Chapter 2 of The Scout Association’s Policy, Organisation and Rules (POR) is entitled “Key Policies”. Within this Chapter of the POR, Rule 2.6 details the Scout Association’s Privacy and Data Protection Policy and the responsibilities within this Policy.

With regard to Privacy and Data Protection, the 18<sup>th</sup> Edmonton Scout Group follows all of Rule 2.6

### Policy

All items of policy detailed below are taken directly from the POR.

The Scout Association takes the protection of privacy and personal data very seriously and all adults operating within Scouting, whether at National UKHQ or within local Scout units (i.e. Scout Groups, Districts, Counties, Areas, Regions (Scotland) or Countries), must comply with data protection law which includes the EU General Data Protection Regulation “GDPR”.

(A copy of The Scout Association’s Data Protection Policy which provides key definitions, details of how it protects personal information and also guidance to staff, members and volunteers about how to deal with personal information they handle, can be found [here](#)).

### Responsibilities within the Privacy and Data Protection Policy

a. The Scout Association at national UKHQ level and each local Scout unit operate as separate, independent charities in their own right. Each collects and handles personal data and is responsible, as a separate data controller, for the personal data it collects and uses.

b. As a larger organisation, The Scout Association is registered with the Information Commissioners Office (ICO) as a data controller. However, data protection law applies to all data controllers (whether registered with the ICO or not) and therefore applies to each local Scout unit.

c. All adults in Scouting have a responsibility to comply with data protection law when handling or dealing with any personal data. However, ultimate responsibility for

Policy:	Anti-Bullying	Exec Approved:	15/01/18
Written By:	Group Scout Leader	Next Review Date:	January 2019

ensuring that adequate data protection systems are in place lies with the relevant charity trustees as follows:

i. at national Scouting level, the Board of Trustees of The Scout Association is responsible for ensuring that adequate data protection systems are in place in respect of The Scout Association UKHQ based at Gilwell Park, Chingford, London E4 7QW; and

ii. at local Scouting level, the local Executive Committees (as the charity trustees) are responsible for ensuring that adequate data protection systems are in place for their respective local Scout units.

d. Whilst the charity trustees and Executive Committees are responsible for ensuring that adequate data protection systems are in place, each adult operating within scouting whether as staff, members or volunteers are also responsible for ensuring that they handle all personal data in compliance with those procedures and the law.

All adult Members and Associate Members of the Association are required to have at least one unique e-mail address (i.e. not one shared with another person or persons) recorded on Compass. This unique e-mail address may be in addition to any shared email address, such as may be in place for shared roles.

This requirement is needed to ensure that each Member and Associate Member receives the information relevant to them, and (in line with the Data Protection and GDPR requirements) prevents them from receiving information intended for another individual.

e. In compliance with the 6 key principles of the GDPR (Article 5), personal data in Scouting must be:

i. Processed lawfully, fairly and in a transparent manner.

Clear and accessible information must be provided to individuals about what personal data is collected, how it will be processed and how they can exercise rights over it e.g. the right to request a copy of their personal data by making a

Subject Access Request (SAR) or to have incorrect data corrected or deleted. This information should be provided both at the initial point of contact in the form of a Privacy Statement or Notice and also be made regularly accessible to the individual. The Scout Association's Privacy Statement as displayed on its website can be found [here](#).

Policy:	Anti-Bullying	Exec Approved:	15/01/18
Written By:	Group Scout Leader	Next Review Date:	January 2019

- ii. Collected and processed for specified, explicit and legitimate purposes only  
Personal data should only be collected and used for activities directly relating to Scouting or a person's membership or association with Scouting;
- iii. Adequate, relevant and limited to what is necessary for the purposes it is collected and processed;
- iv. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that the data is kept as accurate and up-to-date as possible for the purposes for which it is being held;
- v. Kept for no longer than necessary for the purposes it was collected and processed;
- vi. Kept secure using appropriate technical or organisational measures to prevent the data from being used in an unauthorised or unlawful way or against accidental loss, destruction or damage.

As data controllers, the relevant Charity Trustees and Executive Committees are responsible for demonstrating compliance with the above principles.

All GDPR queries should be directed to the Data Protection Officer (DPO), Speranta Knowles, [dpo@18thedmonton.net](mailto:dpo@18thedmonton.net).

### **Version of Chapter 2 of POR in Place at Last Review of this Policy**

The version of Chapter 2 of the POR in place at the time of the last review of this Policy is the version dated January 2019.

Policy:	Anti-Bullying	Exec Approved:	15/01/18
Written By:	Group Scout Leader	Next Review Date:	January 2019