



# GDPR Policy

The General Data Protection Regulations (GDPR) is a revised set of Data Protection rules which came into effect on 25th May 2018. It affects the way we handle and store personal data in Scouting.

### Background

The EU have introduced the GDPR to update and harmonise data protection practises across the EU. It applies to all individuals and organisations who must ensure compliance by the effective date. The GDPR aims to increase protection for individuals and places increased obligations on individuals and organisations to ensure that personal data is handled correctly and securely.

### Risk of non-compliance

Non-compliance to GDPR can be in the form of claims, fines, enforcement action and reputation.

Maximum fines can be 4% of global annual turnover or 20 million euros. For local Scouting this means that Counties, Districts and Scout Groups are accountable and liable for non-compliance.

### Personal Data

All personal data held in both electronic and printed form are covered by the GDPR regulations. This includes but not limited to personal files, memo's, email correspondences and meeting notes. As an organisation we have an obligation to manage all data correctly and protect from unauthorised access.

We are required to review all data we hold as appropriate and justifiable. We must not keep old forms (such as event and health forms unless relating to an incident or safeguarding concern); contact lists (regardless of age); current photos that we don't have permission for. We can keep current records (secured); press cuttings; scrapbooks; records of the history within the District or group; photos (not connected with personal information).

In addition, individuals' rights have been enhanced, including the right to be informed, object and (where applicable) to be forgotten; as well as rights regarding access, rectification, erasure, and automated processes.

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**Specifics**

This policy covers all data held by Enfield District whether held in hard copy format or on an electronic device.

We aim to comply with the six GDPR privacy principles which require data to be:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and up to date
- retained only for as long as necessary
- processed in an appropriate manner to maintain security.

This policy applies to all Scouters holding Enfield District appointments or working on behalf of Enfield District, this includes Explorer Scout Leaders.

**Data Owner**

The 'Data Owner' is the 'Enfield District Scout Executive Committee' who are responsible for all Scouting personal data held by Enfield District this includes Explorer Scout Units, Network and Active Support Units.

**Data Processors**

'Data Processors' are anyone processing data on behalf of 'Enfield District'. This includes Explorer Scout Leaders, Network Commissioner and Active Support Unit Managers.

**Storage**

Personal data on young people in Enfield District should be primarily kept using the 'Online Scout Manager' (OSM) system which is GDPR compliant.

Personal data on adults in Enfield District should be primarily kept using the Scout Associations 'Compass' system which is GDPR compliant.

Any data printed off to hard copy from either system above or collected in hard copy format, for example camp consent and health forms, must be kept as securely as possible and not allowed to fall into unauthorised hands.

Any personal computer records containing personal data about Scout Association members must be stored on a machine that has password or biometric protection in use.

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Every effort must be made to keep personal data up to date.

### **Email**

When sending emails, we should be mindful that an email address is personal information and if sending to many people put the addresses into the 'bcc' field so that addresses are not disclosed to everyone receiving the email.

We never disclose personal email addresses unless specific consent has been obtained. The District has @enfieldscouts.org addresses for all primary roles and these can be disclosed.

### **Retention**

Hard copy data should be securely destroyed within 14 days of the finish of the event it was collected for. For example, personal data printed for a camp or activity should be destroyed within 14 days of the end of the event unless relating to an incident or safeguarding concern.

Permission must be sought and obtained from either the District Commissioner, District Explorer Scout Commissioner or District Chair to retain data beyond the 14 days.

OSM records must be cleared of personal data when the young person leaves the movement.

Roles on Compass must be closed when the adult is no longer active so that the data can no longer be seen.

### **Sight**

All adults and young people have the right to see all data held about them.

### **Corrections**

All adults and young people have the right to have any incorrect data about them corrected.

### **Right to be Forgotten**

All adults and young people have the right to be asked for their records to be deleted. This must be complied with unless there are good reasons not to, for example, they are involved in an ongoing court case with the Scout Association.

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### **Subject Access Requests (SAR)**

Anyone can make Subject Access Requests (either written or verbally). You have 30 days to respond back to an individual. They don't need to provide a reason.

Information should be provided free of charge and be concise, transparent and intelligible. It should include (but not limited to) what data is being held and how; the purpose for holding the data; who has access to that information.

To ensure compliance with SARs we must

- not ignore;
- not delay;
- verify the requestor;
- locate the data;
- redact information relating to others;
- respond concisely within the deadline.

### **Further Advice**

Please seek advice from the District Commissioner, District Explorer Scout Commissioner or District Chair if you are unsure about anything in this document.

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