

Data Protection and Privacy Policy

Sutton Coldfield Adventure Unit

Review Date: November 2022



v2 November 2021

Reviewer: Rob Adams			
Date	Version	Amendments	Approved by Trustees
02/2018	1	Updates for GDPR 2018	
11/2021	2	Minor text revisions – change archive period for children’s records and lead person.	
Next review: November 2022			

Introduction

Sutton Coldfield Adventure Unit (SCAU) acquires personal data during the course of its activities. All personal data held is treated in strict confidence and is only used for the purpose for which it is collected. No data will be shared with third parties, outside of SCAU, without first seeking the explicit consent of the person, or if a child, their parent or guardian. Sharing personal data within the SCAU leadership will be on a 'need to know' basis.

This policy aims to explain:

- What is personal data
- How that personal data will be treated
- What personal data will be retained
- How long it will be retained for
- The rights of the individual

Definitions

The relevant definitions are contained in the UK General Data Protection Regulation (GDPR) at Article 4. Details of the specific provisions and helpful guidance regarding GDPR can be obtained from the website of the Information Commissioner's Office (<https://ico.org.uk>).

The key definition from an individual's point of view is what amounts to "personal data". The definition in GDPR effectively means that if any information can be used to work out who a person is, either on its own or together with other information, it amounts to personal data. The person about whom personal data is held is defined as the Data Subject.

What personal data does SCAU hold?

SCAU holds personal data about the children who are placed in our care during SCAU activities and the leaders who engage with the children. It also maintains a waiting list consisting of the identities of children waiting to join SCAU and relevant contact details.

The personal data held about children in our care is limited to that which is required to meet our responsibilities. For example, the child's full name, date of birth, address, emergency contact details (including GP surgery) and any essential medical and/or dietary requirements or medical conditions. Such information is essential as a condition of membership of SCAU and the joining forms contain a declaration which a parent or guardian is required to complete to confirm understanding.

SCAU will also need hold additional personal data about the children in our care in specific circumstances. For example, passport details of members who attend camps abroad. Such personal detail will be retained only for as long as is necessary for the specific purpose for which it is obtained.

To promote its activities and to provide parents with feedback, SCAU may publish on its website or via social media anonymised photographs of activities members undertake both during camps and

from time to time during its routine meetings. Consent for publication of such photographs is obtained from a parent or guardian and an optional consent for this purpose is contained within joining forms. If at any stage a parent or guardian wishes to withdraw consent, they should contact SCAU in writing or by e-mail.

SCAU also holds personal data about the leaders who engage with the children and who represent SCAU. Such personal data processing amounts to no more than is necessary to ensure proper selection, vetting and training procedures are adhered to.

On what basis does SCAU hold that information?

Personal data is held about the children in our care on grounds of the legitimate interests of SCAU. Such information is required, as a practical necessity, as a condition of membership. Following the child's leaving SCAU some, minimal personal information will be retained as indicated below and in accordance with the retention policy.

Personal data about leaders is held on grounds of the legitimate interests of SCAU. Those legitimate interests include the need to demonstrate that leaders are of suitable character and to document that all relevant training and vetting requirements are adhered to.

How will that personal data be treated?

Personal data may be retained in paper or electronic format.

If the data is in paper format the following guidelines will apply:

- When not required the paper or files will be kept in a locked drawer or filing cabinet.
- Any copies or summaries of personal data prepared should be for specific purposes (for example, details of attendees at camps and parents' contact details), and access will be restricted to a core group of leaders with organisational responsibilities. Any paper copies made will be collected and disposed of securely following completion of the event.

If the data is in electronic format the following guidelines will apply:

- Personal data will be stored only on password protected laptops and/or approved cloud computing services and/or Online Scout Manager (OSM).
- Data must not be saved directly to unprotected laptops or other mobile devices such as tablets or smartphones except for specific, temporary, purposes. It must be deleted after that specific purpose.
- If personal data is stored on removable media (for example, CD-ROM or memory stick), such data must be password protected and, when not in use, kept in a locked drawer or filing cabinet.
- Photographic personal data will be published only in anonymised format and with approval of the data subject or their parent/guardian.

Will the personal data be shared with other organisations?

SCAU will not share personal data with other organisations without obtaining specific consent.

Some sharing will be inevitable in carrying out activities such as camps, as the venues we attend will require basic details of attendees for their own insurance and health and safety requirements. Where such data sharing is necessary and has been specifically consented to by a parent or guardian, SCAU will ensure that the third party organisation is aware of its obligations under GDPR and will treat the personal data with the proper respect.

How long will the data be retained for?

This will vary, depending on the nature of the information and who it relates to.

SCAU will undertake an annual review of personal data and, on the review date following the period specified below, will delete from its records the information referred to.

In relation to children:

- All personal information will be retained for a period of 12 months following the child's date of leaving SCAU.
- The child's name, date of birth and dates of membership of SCAU will be retained for an indefinite period, purely for archival identification.

In relation to leaders:

- All personal information will be retained for a period of 12 months following the leader's date of leaving SCAU.
- The individual's name, date of birth and dates of involvement with SCAU will be retained for an indefinite period, for archival identification.
- Any non-standard DBS clearances will be retained indefinitely.

Such historical data regarding individuals as SCAU retains on the basis of legitimate interests will be held only on a central electronic database accessible only by the Trustees from time to time in place.

Any personal data identified during the annual data audit as having been gathered for a temporary reason (such as camps and one-off activities) that is no longer required for that specific purpose will be deleted.

Rights of the individual

The website of the Information Commissioner's Office (<https://ico.org.uk>) contains useful information and guidance regarding a person's rights flowing from GDPR and the retention of data. General rights (not necessarily relevant to SCAU related activities) under data protection legislation include:

- The right to request access to your personal data. This enables you to receive a copy of the personal data held about you and to check that the data controller is lawfully processing it.
- To object to particular processing or handling of personal data.
- To prevent processing for direct marketing.
- To request correction of any inaccurate personal data.
- To request deletion of your personal data where there is no good reason for the data controller continuing to hold it.

Queries, Requests and Complaints

If you have any query, or would like any further information regarding GDPR or the personal data in SCAU's possession please contact Rob Adams in the first instance by email: rob.adams@scau.co.uk. Alternatively, any of the Trustees will endeavour to help.