



BBS/BGS Group and Member, and Census Privacy policy

Introduction

1.1 We are committed to safeguarding the privacy of the **members of the BBS and BGS Association**.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of the **BBS and BGS Association**; in other words, where we determine the purposes and means of the processing of that personal data.

1.5 In this policy, "we", "us" and "our" refer to **The British Boy Scouts and British Girl Scouts Association**

Credit

2.1 This document uses parts of a template from SEQ Legal (<https://seqlegal.com>).

How we use your personal data

3.1 In this Section 3 we have set out:

- the general categories of personal data that we may process;
- in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- the purposes for which we may process personal data; and
- the legal bases of the processing.

3.2 Group and Member Registration form and Census

3.2.1 What Data are collected?

All data pertain to the data subject 'the group', and associated with scouter data collected in 'Warrant application and scouter information'.

- "Scout Group data":
 - Name of the Scout group
 - Address
- "Scout Group responsibility data":
 - Name of Scouter responsible for group
 - Contact details of sponsoring authority
- "Census data":
 - Numbers of Boys and Girls in each section (Beavers, Wolf Cubs, Scouts, Senior Scouts, and Rovers)

3.2.2 What is the functional reason for collecting data?

"Scout Group data" and "Scout Group responsibility data" are used to ensure that Commissioners have correct contact details for each group, such that groups can be contacted for training, camps, parades, and other events.

"Scout Group data" and "Scout Group responsibility data" are also used to ensure each group adheres to the correct management structure, such that it can be ensured that each group complies with the requirements of the charities act, and insurance requirements.

"Census data" as non-person-specific data is required by some funding agencies such that the association can fund raise as part of its function as a charity. In addition, "Census data" allows the association to monitor membership of groups, which may indicate a struggling group requiring support.

Data are treated as internal data and used to ensure that due diligence has been taken such that groups are run in line with the conditions set out in the constitution.

3.2.3 What is the reason or lawfully processing data?

The legal basis for this processing is the BBS and BGS Association's legitimate interests, namely to ensure each group maintains the correct management structure, ensuring each group complies with the requirements of the charities act and insurance requirements, detect a struggling group, and to approach funding agencies.

3.2.4 How are data protected?

Data are compiled and stored in an Excel document in a document store in Office 365 SharePoint to which only commissioners can access as detailed under Office 365.

If sending electronically, GSMs shall only send census forms to the Chief Commissioner via the groups Office 365 GSM e-mail account provided by the association, rather than using a personal e-mail account.

Hard copies of the forms are scanned and the originals subsequently destroyed. The scanned copies are stored on Office 365 in the commissioner's documents' store to which only commissioner have access.

3.3 Warrant Application, Scouter Information

3.3.1 What Data are collected?

All pertain to the data subject – 'the scouter', and are associated with the group(s) they pertain, and DBS processing.

- "Scouter Contact Data":
 - Name
 - Data of Birth
 - Address
 - Telephone Number
 - E-mail Address
- "Warrant Data":
 - Rank Applied For
 - Group
 - Date of Appointment(s)
- "Award Data":
 - Main awards gained with dates
- "Previous Service Data":
 - Dates names and locations of previous scout groups (scout service record)

The following data are collected as detailed under "DBS processing":

- "DBS Data"
 - DBS number
 - Last DBS date

"The following data is additionally collected and used for new applications, but is not stored as part of the "Scouter Information" spreadsheet.

- "Occupation and Skills Data":
 - Occupation
 - Present employment details and skills and responsibilities
 - List of special skills and qualifications
- "Gender Data":
 - Gender
- "Referee Data"
 - First Referee name, occupation, address, and telephone number
 - Second Referee name, occupation, address, and telephone number
- "Criminal Offence Data"
 - Office pertaining to young people

- Date of offence
- Details of sentence or judgement

3.3.2 What is the functional reason for collecting data?

- “Scouter Contact Data” and “Warrant Data” is used to ensure that Commissioners have correct contact details for each group, such that groups can be contacted for training, camps, parades, other events, or to otherwise contact the scout members to inform them of news and other matters concerning the association.
- “Award Data” is used such that we can honour existing scouter awards, and record the obtainment of such awards in the BBS/BGS Association.
- “Previous Service Data” is used such that we can recognise existing scouter service, and record the service in the BBS/BGS Association, such that we can suitably recognise this in the BBS/BGS Association.
- “DBS Data” is used such that The BBS/BGS Association must ensure and demonstrate that all of our team are checked via DBS. It is such a requirement of safeguarding, constitution, and insurance.
- “Criminal Offence Data” is required as the BBS and BGS Association has a legal requirement and need, to ensure and demonstrate that all of our adults involved with young people have no such convictions of concern. This is a requirement of safeguarding, and our constitution.
- “Occupation and Skills Data” is used to identify key skills that can support the association.
- “Gender Data” is used for identification purposes, as it is not always possible to determine gender by name alone. As a ‘traditional’ association scout association, formal scouter ranks are in the format of *Scout Master* or *Lady Scout Master*.
- “Referee Data” is used as the association has a duty to assess the suitability for scouters to work with young people. The association needs to demonstrate due diligence from an insurance point of view.

3.3.3 What is the reason or lawfully processing data?

The legal basis for this processing “Scouter Contact Data”, “Warrant Data”, “Award Data”, and “Previous Service Data” is the BBS/BGS Association’s legitimate interests, namely the association’s duty to ensure that scouters are suitable for working with young people, and ensuring that the association can maintain contact with scouters.

The legal basis for this processing “DBS Data”, “Occupation and Skills Data”, “Gender Data”, “Referee Data”, and “Criminal Offence Data” is consent of the data subject controller. The warrant application form therefore actively request consent to store and process these data.

3.3.4 How are data protected?

Data are stored in a document store in Office 365 SharePoint to which only commissioners can access as detailed under Office 365.

Hard copies of the forms are scanned and the originals subsequently destroyed. The scanned copies are stored on Office 365 in the commissioner’s documents’ store to which only commissioner have access.

GSMs shall only send Warrant Application forms to the Chief Commissioner via the groups Office 365 GSM e-mail account provided by the association, rather than using a personal e-mail account.

3.4 Address List

3.4.1 What Data are collected?

The document is composed of data collected from **Group and Member Registration form and Census** and **Warrant Application, Scouter Information**.

- “Scout Group data”:
 - Scout group name*
 - Scout group address*
 - Section day and time
- “Scout Group Scouter data”
 - Name, address, telephone number, and e-mail address of each section scouter #, Chairman*, treasurer* and secretary*

* From **Group and Member Registration form and Census**

From **Warrant Application, Scouter Information**

3.4.2 What is the functional reason for collecting data?

The “Scout Group data” and “Scout Group Scouter data” is used to ensure that Commissioners have correct contact details for each group, such that groups can be contacted for training, camps, parades, other events, or to otherwise contact the scout members to inform them of news and other matters concerning the association.

The “Scout Group Scouter data” is also used to ensure that each group adheres to the correct management structure, such that it can be ensured that each group complies with the requirements of the charities act, and insurance requirements.

The Scout Group name and general location is published on the Association’s website. In addition, functionally to contact the group without exposing the e-mail address to the user is provided.

3.4.3 What is the reason or lawfully processing data?

The legal basis for this processing is the BBS/BGS Association’s legitimate interests, namely to ensure each group maintains the correct management structure, ensuring each group complies with the requirements of the charities act and insurance requirements, detect a struggling group, and to approach funding agencies.

3.4.4 How are data protected?

Data are stored in an Excel document in a document store in Office 365 SharePoint to which only commissioners can access as detailed under Office 365.

GSMs shall only send Chief Commissioner details of their groups via the groups Office 365 GSM e-mail account provided by the association, rather than using a personal e-mail account.

3.12 Additional

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.13 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.14 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.15 Please do not supply any other person's personal data to us, unless we prompt you to do so.

Providing your personal data to others

4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

International transfers of your personal data

5.3 Data is stored using Office 365; the hosting facilities are in the United Kingdom.

5.5 You acknowledge that personal data that you submit for publication through our website or services may be available, via the Internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain your personal data as follows:

Data are stored for all active groups. If a group becomes dormant, then the details will be removed five years after the Chief Commissioner has been formally notified of this fact. This allows time for the group to be potentially reformed.

Data are stored for all active Warranted Scouters. If a Warranted Scouter leaves the BBS, then his/her details will be removed five years after the Chief Commissioner has been formally notified of this fact. This allows sufficient time for a cooling off period, or if the details are required for legal reasons as described in 6.5.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

Your rights

8.1 You may instruct us to provide you with any personal information we hold about you. The provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

8.2 We may withhold personal information that you request to the extent permitted by law.

8.3 You may instruct us at any time not to process your personal information for marketing purposes.

8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

Systems Used by The BBS and BGS Association

9.1 DBS Processing

The BBS/BGS Association uses <https://www.disclosureservices.com/> to process DBS applications. The onus is on the applicant to complete his or her application.

Data are stored and handled by Disclosure Services

BBS Officials have two levels of access:

- **Verifiers** (this responsibility is limited to four people currently). These officials can access applicants' data: a requirement of checking ID once submitted.
- **Overall Responsibility** – The Chief Commissioner and Grand Scout. These officials have access to all data stored via Disclosure Services for our association. These officials have a duty to keep all current applicants, and be able to prove previous members had a DBS at the required time

The DBS system does not store the certificate itself, only the number. The association is sent a copy certificate if it is clean. If it is a rejected, the association is sent notice that we should ask to see the rejected certificate. This then provides the association an opportunity (if suitable) to review the failure and make a judgement thereafter.

Disclosure Services act as the Data Processor for this function. The Privacy Policy for Disclosure Services may be found here: <https://www.disclosureservices.com/page/privacy>

9.2 Office 365

Data are stored in Office documents in an Office 365 SharePoint document library to which only commissioners can access. Access control is protected by Office 365 authentication for each individual commissioner using a username and complex password. SharePoint uses HTTPS.

Office 365 is a GDPR compliant system. The Microsoft Online service terms and conditions are provided here <http://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=3&DocumentTypeId=46> under 'MicrosoftOnlineServicesTerms(English)(May2018)' in the Processing of Personal Data; GDPR section.

Our details

13.2 We are a registered charity in England and Wales under registration number 288631

13.4 You can contact us using our website contact form: <http://bbsandbgs.org.uk/contactus.php>

Data protection officer

14.1 Our data protection officer's contact details are: dpo@bbsandbgs.org.uk