

# General Data Protection Regulations Policy

(GDPR)



# Scouts

## Greater London North



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

**Background:**

The EU have introduced the GDPR to update and standardise data protection practices 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 is not limited to personal files, memos, e-mail correspondences and meeting notes. As an organisation we have an obligation to manage all data correctly and protect it from unauthorised access.

We are required to review all data we hold as appropriate and justifiable. For example we must not keep old forms, such as event attendance and health forms, unless it relates to an incident or safeguarding

In addition to this individual's rights have been enhanced, including the right to be informed as well as increased rights regarding access, rectification, erasure and automated processes.

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## **GLN GDPR Policy**

This policy covers all data held by Greater London North Scout County District either in hard copy format or stored electronically.

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 a Greater London North County appointment or who are working on behalf of Greater London North County. This includes the County Active Support Units and Jamboree Unit.

### **Data Owner**

The Data Owner is the Greater London North County Executive Committee who are responsible for all Scouting personal data held by Greater London North County this includes County Active Support Units, Jamboree Unit, The County Training Team and The County Leadership Team.

### **Data Processes**

Data Processors are anyone processing data on behalf of the Greater London North County. This includes County Active Support Units, Jamboree Unit, The County Training Team and The County Leadership Team.

### **Storage**

Personal data on young people in the Greater London North County is primarily stored in either the Online Scout Manager (OSM) system or on the S50 and C20 registration website. All of which are GDPR compliant.

Personal data on adults in Greater London North County are primarily stored in either the Scout Associations Compass system or the training events website, which are GDPR compliant.

Any data printed off to hard copy from either system or collected in hard copy format must be kept as securely as possible and should not be allowed to fall into unauthorised hands.

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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.

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

### **E-mail**

When sending e-mails, we should be mindful that an e-mail address is personal information and if sending to many people the BCC field should be utilised to avoid disclosing that data to everyone.

Greater London North County will never disclose personal e-mail address unless consent has been gained.

Greater London North County utilises @gln-scouts.org.uk e-mail 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 Chair of the Greater London North County Executive or the County Commissioner 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.

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### **Right to be Forgotten**

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

### **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 County Commissioner or the Greater London North Executive committee if you are unsure about anything in this document.

**END OF DOCUMENT**

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