
Document Retention & Privacy Policy

October 2018

Our Document Retention and Privacy Policy describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR) and related legislation.

1. Who are we?

Central Yorkshire County Scout Council (the County) is a registered charity (No. 524828) responsible for the support and development of Scouting in Leeds and Wakefield and surrounding areas.

Our mission is to actively engage and support young people in their personal development, empowering them to make a positive contribution to society. We are incorporated by Royal Charter and are regulated as a member of The Scout Association, (Registered Charity No. 306101), see scouts.org.uk for more detail.

Our County Executive Committee, made up of our Trustees, is the data controller for the information we collect. Any personal data that we collect will only be in relation to the work we do with our members and through our relationship with supporters, funders and partners.

2. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the County's (the data controller), possession or likely to come into such possession. The processing of personal data is governed by the GDPR.

3. How we gather personal information

The majority of the personal information we hold, is provided to us directly by you or parents/legal guardians by various methods, e.g. paper forms, online, via third-party data processors, via Compass (the online membership system of The Scouts), from online membership systems and through third-party reference agencies, such as the Disclosure and Barring Service (DBS).

Personal information is also collected from our constituent Districts and Groups for the purposes of county-wide activities (e.g. the Challenge camps or annual awards presentation evenings)

4. How do we process your personal data?

We comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We process the data to have the ability to contact the member, parents and guardians, to inform them of meetings, events that the County may be running or attending.

We use personal data for the following purposes:

- We collect personal and medical information for the protection of that person whilst in the care of the County
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution
- To administer membership records
- To fundraise and promote the interests of Scouting across Leeds and Wakefield
- To manage our volunteers
- To maintain our own accounts and records (including the processing of gift aid applications)
- To inform you of news, events, activities and services relating to your membership.

5. What is the legal basis for processing personal data?

We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

1. We need to use the information to comply with our legal obligations
2. We need to use the information to contact you regarding meetings, events etc.
3. It is fair to use the personal information in your interests, for example medical emergencies or County newsletters

6. How we store personal data

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We generally store our adult members' personal information in Compass. With the exception of youth members in County roles, no youth member information is permanently stored by the County, although our constituent Districts and Groups maintain this information for the delivery of Scouting to our members.

7. Printed records and event data

Paper is still used to capture and retain some data for example the following: -

- New adult volunteers (Adult Information Form)
- DBS & identity checking forms (if used)
- Gift Aid Collection forms

In the case of Adult Information Forms and ID checking forms, this information is securely held by the person processing the data and transferred to Compass or secure storage as soon as possible before the paper forms are destroyed.

8. Gift Aid

Collection forms will be securely held by the County Treasurer to aid in the collection of Gift Aid, where applicable. We have a legal obligation to retain this information for 7 years after our last claim.

9. Sharing and transferring personal Information

We will only normally share personal information within the County with members of the County Team and the County Executive.

We will however share your personal information with others outside the County where we need to meet or enforce a legal obligation. This may include your scout District, The Scout Association and its insurance subsidiary Unity, local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.

We will never sell your personal information to any third party for the purposes of marketing.

10. County operated websites

Central Yorkshire Scouts manage a suite of websites for public and member use. To ensure the relevant functionality of sites appropriate technologies are used, such as cookies and third-party tools (e.g. YouTube and Twitter). Details of such technologies can be found on each site.

11. Third Party Data Processors

Central Yorkshire Scouts uses the following third-party data processors: -

- The Scout Association via its adult membership system “Compass” which is used to record the personal information of adult members
(www.scouts.org.uk/privacy-policy).
- Atlantic Data: we use Atlantic Data to administer Disclosure and Barring Service criminal records checks
(thescouts.disclosures.co.uk/secure/PrivacyStatement.pdf).

12. Automated decision making

Central Yorkshire Scouts does not have any automated decision-making systems in place.

13. Transfers outside the UK

Central Yorkshire Scouts will not transfer your personal information outside of the UK, unless it is necessary to provide personal information to comply with our legal obligations, or where an event is taking place outside of the UK. In such circumstances it is usual for such an event to have its own data collection form which will be securely held and disposed of after the event by the organisers.

Where a third party (e.g. Microsoft Office 365) is used for data storage then this may be stored outside the UK, but within Europe.

14. How do we protect personal data?

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and is only kept as long as necessary for the purpose for which it is used.

15. How long do we keep your personal data?

We will keep personal information only for its original purpose, and in line with the following table:

Data Description	Retention Period
Information about our adult members	Retained whilst a current member, although a subset of data is retained if the adult leaves Scouting
Information about Safeguarding Incidents	Until the case is closed, then data is stored with The Scout Association (HQ) and local copies are destroyed
Information about Reportable Incidents	Held until fully reported to HQ then local data destroyed
Information about Non-Reportable Incidents	3 years after the event, or if under 18 at the time retained until the young person's 21 st birthday
Information about attendance at County events, including attendance at Aldwick and Bramhope	Destroyed within one month of the event, unless a reportable incident then kept as for Reportable Incidents
Information about attendees at adult training events	Adult training records are maintained on Compass. Local attendance information destroyed 6 months after the event, unless a reportable incident (see above)
Information about general enquiries, including youth joining and adult volunteering	One year after enquiry has been answered. Some data kept for statistical analysis.
Information about Complaints	3 years after end of complaint process
Gift Aid Claim information	7 years as required by HMRC
Role Review forms	Destroyed after role review has been completed and agreed recommendations entered into Compass
Appointments Committee and Recruitment	6 months after decision made

16. Your rights and your personal data

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the data protection regulator.

Please note that as scout Counties, Districts and Groups are separate charitable bodies, any data stored by Groups or Districts (e.g. information on individual youth members) is not available to Central Yorkshire County.

17. Further processing

If we wish to use your personal data for a new purpose, not covered by this Policy, then we will provide you with a new policy explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

18. Updates or changes to the Policy

We reserve the right to make changes to this Policy.

19. Exceptions to the Policy

It is accepted that no Policy can cover all situations. Therefore, in any situation where an exception to this policy is identified, it must be raised for review and approval. This review can occur at the County Executive, or at one of its sub-committees if more appropriate. Decisions made by this committee are final, and where an exception is granted it should be for no longer than one year, but may be refreshed.

20. Disclosure of data by order of a Court

We reserve the right to communicate personal information we hold without notifying you to third parties who are empowered by regulation, statute or order of a court.

21. Contact Details

If you want to contact us to raise any questions about this privacy statement, or any general matters relating to the way we process and hold data, you can contact us using this email address:

DPO@cycscouts.org.uk or by the contact methods listed at cycscouts.org.uk

All information in this Policy is correct as of the date of publication.