



Horsham District Scout Council

Data Privacy Policy

What is this privacy notice/policy?

This Data Privacy Notice/Policy describes the categories of personal data Horsham District process and for what purposes. Horsham District are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

This Privacy Notice/Policy applies to youth members, parents/guardians of youth members, adult volunteers, supporters, donors, and members of the public who may contact Horsham District.

Who we are?

Scout Groups, Districts, Counties/Areas/Regions (Scotland) are separate charities as is the Scouts UK Headquarters ('UK HQ'), as a national charity, with each accountable for their own compliance with the GDPR.

Horsham District Scout Council are a registered charity with the Charity Commission for England & Wales; charity number 1076603. From this point on members of Horsham District Scout Council together with those members of Scout Groups within the Horsham District area who utilise Horsham District resources for email and data storage, will be referred to as "we" or "Horsham Scouts".

Horsham District Scout Council's responsibility for compliance rests with its Trustee Board who are appointed at an Annual General Meeting and are the Charity's Trustees.

Horsham District appoints a Data Lead, to oversee issues, cases, and enquiries to do with our Data Protection Policies.

Each adult volunteer must also ensure that they comply with data protection law when handling any personal data.

The data we may process.

The majority of the personal information we hold is provided to us directly by adult volunteers or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership systems. The privacy and security notice for our youth membership system provider can be found at [Online Scout Manager \(OSM\): Security and GDPR](#). In the case of adult volunteers, data may also be provided by third parties, such as the England & Wales - Disclosure and Barring Service (DBS). Where a member is under the age of 18, this information will only be



obtained from a parent or guardian and cannot be provided by the young person. We may collect the following personal information:

- Personal contact details such as name, title, address, telephone numbers and personal email address - so that we can make contact.
- Date of birth - so that we can ensure young people are allocated to the appropriate Section for their age and that adults are old enough to take on an appointment with Scouting.
- Gender – so that we can address individuals correctly and accommodate for any specific needs.
- Emergency contact information - so that we can contact someone in the event of an emergency.
- Government identification numbers e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.
- Bank account details, payroll information and tax status information - so that we can collect gift aid from HMRC where donations are made.
- Training records - so that adult volunteers can track their progression through the Scout programme or adult training scheme.
- Race or ethnic origin - so that we can make suitable arrangements based on members cultural needs.
- Health records - so that we can make suitable arrangements based on members medical needs.
- Criminal records checks - to ensure Scouting is a safe space for young people and adults.
- Information about disabilities - to enable us to make appropriate adjustments.

The lawful basis we process data by

We comply with our obligations under the GDPR and DPA 2018 by processing it only for the purpose for which it is collected; 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.

Sensitive (special category) data for both adult volunteers and our youth members will align to the lawful basis of our legitimate activities. Explicit consent is requested from parents/guardians to take photographs of our members, where such photographs place the data subject as the focal point of the shot. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

We use personal data for the following purposes:

- to provide information about Scout meetings, activities, training courses and events to our members and other youth members and adult volunteers.

- to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution.
- to administer youth members and adult membership records.
- to fundraise and promote the interests of Scouting.
- to manage our adult volunteers.
- to maintain our own accounts and records (including the processing of gift aid applications).
- to inform subjects of news, events, activities, and services being run or attended by youth members and adult volunteers.
- to ensure and evidence an adult's suitability in volunteering for a role in Scouting.
- to contact next of kin in the event of an emergency.
- to ensure members have and maintain the correct qualifications and skills.

We use personal sensitive (special) data for the following purposes:

- for the protection of a person's health and safety whilst in the care of Horsham District.
- to respect a person's religious beliefs with regards to activities, food, and holidays.
- for equal opportunity monitoring and reporting.
- to respect a youth member or adult volunteers gender identity.
- to ensure we are aware of additional needs so we can make appropriate adjustments where necessary.

Our retention periods

We will keep certain types of information for different periods of time in line with our retention policy.

Item	Details	Retention	Lawful Interest
Accident/Incident Report	Details of an accident or incident that occurred as part of a Scouting activity	7 years after incident, or 7 years after individual turns 18 if later	Processing is necessary to protect the vital interests of a data subject or another person
Adult Awards	Applications for and records of adult service, conduct and gallantry	District access restricted to name only upon closure of final role. TSA retains some data in line with its own Data Retention policy	Consent of the data subject
Adult Permits	Records of applications, assessments, authorisations held to lead certain specialist activities	District access restricted to name only upon closure of final role. TSA retains some data in line with its own Data Retention policy	Processing is necessary to protect the vital interests of a data subject or another person
Adult Roles	Records of volunteering service within Scouting	District access restricted to name only upon closure of final role. TSA retains some data in line with its own Data Retention policy	Processing is necessary to protect the vital interests of a data subject or another person

Item	Details	Retention	Lawful Interest
Adult Training	Records of Adult Volunteer training completed or outstanding	District access restricted to name only upon closure of final role. TSA retains some data in line with its own Data Retention policy	Processing is necessary to protect the vital interests of a data subject or another person
Adult Volunteers Personal Details	Adult Volunteer personal details are gathered and maintained throughout the period of volunteering. This may include sensitive data such as medical details.	District access restricted to name only upon closure of final role. TSA retains some data in line with its own Data Retention policy	Processing is necessary to protect the vital interests of a data subject or another person
Away Event Attendance	Planning and supporting details of an event. This may include additional contact, permission and sensitive personal data relating to those taking apart.	Retained 2 months after event or until any follow activities are concluded and other personal details have been updated.	Processing is necessary to protect the vital interests of a data subject or another person
Campsite Booking	Booking of facilities or activities at the campsite made by an adult volunteer	Retained for 3 months after the event or any follow activities have been concluded whichever is the soonest	Consent of the data subject
Campsite CCTV	Recording of visitors to the District Campsite	No CCTV images or recording will be retained on the CCTV recording system for more than 14 days. Note the capacity of the CCTV recording system is such that the images will be overwritten within the retention period.	Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Campsite Enquires	General enquiry received from an external party	Retained for 1 month or as long as required to support the processing of the enquiry, whichever is longer	Consent of the data subject
DBS and Reference Checks	Adult information gathered as part of the pre appointment checking of adult volunteers	Until data has been submitted to DBS and the vetting process is complete. TSA retains some data in line with its own Data Retention policy	Processing is necessary for compliance with a legal obligation
General Enquiries	General enquiry received from an internal or external party	Retained for 1 month or as long as required to support the processing of the enquiry, whichever is longer	Consent of the data subject
Section Meeting Attendance	Register of Attendance at a section meeting	18 months after the meeting	Consent of the data subject

Item	Details	Retention	Lawful Interest
Trustee Meeting Minutes	Minutes or notes of trustee meetings.	Retained for 6 years although where sensitive personal data is contained distribution should be restricted and where appropriate direct reference to individuals anonymised	Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights, or freedoms of the data subject
Want to join Enquiry	Parents and young person's data gathered as part of a joining enquiry	Enquiries are retained for 3 months. Some data (group, postcode and age) are retained longer to support planning of local scouting provision	Consent of the data subject
Youth Awards and Badges	Records of Awards and badges young person has completed or working towards	Upon leaving the section records should be transferred to any new section or deleted within 6 months after the young person leaves	Consent of the data subject
Youth Members Personal Details	Youth members details are gathered and maintained through the young person's membership. This includes parents, guardians, and emergency contact details as well as sensitive data such as medical details.	Upon leaving the section records should be transferred to any new section or deleted within 6 months after the young person leaves	Consent of the data subject
Youth Sectional Membership	Record of youth members sectional membership	Upon leaving the section records should be transferred to any new section or deleted within 6 months after the young person leaves	Consent of the data subject
Christmas Tree Collection	Horsham Campsite operate a Christmas tree collection and disposal service. The tree owners' names and address of members of the public are collected within an online system and used to schedule the collections.	Collection details should be removed within 2 weeks after the collections are complete.	Consent of the data subject

The Scout Association's Data Protection Policy can be found [here](#) and the Data Privacy Notice [here](#).

Joint control of adult volunteer data

The Scout Association and Horsham District Scouts process the data of members, parents/guardians and adult volunteers on our membership databases.

Information The Scout Association and Horsham District Scout hold about volunteers may include the following.

- name and contact details.
- length and periods of membership and volunteer service.
- details of training received.
- details of experience, qualifications, occupation, skills and any awards they may have received.
- details of Scouting events and activities they have taken part in.
- details of next of kin.
- age/date of birth.
- details of any health conditions.
- details of disclosure checks.
- any complaints we have received about the member.
- details about their role(s) in Scouting.
- details about their membership status.
- race or ethnic background and native languages religion.
- nationality.
- additional needs.

Processing Activities

The following is a list of common data processing activities for youth members, adult volunteers, parents/guardians of youth members and volunteer data on the membership systems. This includes an indication of which entity carries out this activity which is shared with the other.

Processing Activity	Description	Processing entity
Adult volunteer capture	Initial data load of a new adult volunteers onto the national membership system.	Horsham District.
Adult volunteer disclosure check	Disclosure checks for any adult volunteers that require them.	Horsham District initiate and The Scout Association completes the check.
Adult volunteer operational administration	This may include: <ul style="list-style-type: none"> • Adult volunteer data updates. • Maintaining training records. • Events attended. • Permits approved. • Awards. • Leaving. 	Horsham District and The Scout Association

Adult volunteer disciplinary	Adult volunteer disciplinary detail capturing where a Scout Member has breached POR or any other Scout policy.	Horsham District initiate, The Scout Association involved if severity meets a policy threshold
Youth Members (14-25) capture	Initial data load of a new Youth Member onto the membership database.	Horsham District.
Scout Member data reporting	Reporting on trends and monitoring data to be able to demonstrate the impact Scouting has and to attract funding (this may include optional special category data of the Scout Members)	The Scout Association and Horsham District may access special category data for Census and local Scouting delivery.
Adult Volunteer Training	Records of optional or compulsory training for adult volunteers (where applicable).	The Scout Association
Want to Join enquires	Form data required to support the processing of the enquiry and for ongoing research and statistical purposes	Horsham District
Closed Circuit Television (CCTV)	Capturing of CCTV for the purposes of managing the security of members and property.	Horsham District

For further details on The Scout Association policies, please see The Scout Association's Data Protection Policy can be found [here](#) and the Data Retention Policy [here](#).

Sharing Information

Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment in the Horsham District. This may include Scout groups operating within Horsham District, each of which operates as independent data controllers.

Adult Volunteers

We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association for the Horsham District as well as with West Sussex Scout County and The Scout Association Headquarters as independent data controllers.

All data subjects

We will however share personal information with others outside of Horsham District where we need to meet a legal obligation. This may include The Scout Association and its insurance



subsidiary (Unity Insurance Services), local authority services and law enforcement. We will only share personal information to the extent needed for those purposes.

We will only share data with third parties outside of the organisation where there is a legitimate reason to do so.

We will never sell personal information to any third party.

Sometimes we may nominate a member for national awards, (such as Scouting awards or Duke of Edinburgh awards) such nominations may require us to provide contact details and award nomination details, such as citations to that organisation. We may also share data on award nominees for National Honours Awards, including the same data as above.

Where personal data is shared with third parties, we will seek assurances that personal data will be kept confidential and that the third party fully complies with the GDPR and DPA 2018.

How we store your personal data

We generally store personal information in the following ways:

Compass	is the online membership system of The Scout Association, this system is used for the collection and storage of adult volunteer personal data.
Online Scout Manager	is the online membership system of Online Youth Manager. Note this is subject to individual sectional Data Processing Agreements, accepted by main data processor for that section.
Venue Booking System	is the online booking system used for Campsite bookings.
Office 365	is the repository for all documents and email correspondence related to the activities of Horsham District.
District Website	Details of contacts and copies of form-based enquiries to members of Horsham District and other Scouting groups within the Horsham District area.
Online Event Sites	e.g. Christmas Tree collection or online booking systems such as Eventbrite.
CCTV Images	Dedicated storage device held in a secure and alarmed room

In addition, adult volunteers may hold some personal data on local spreadsheets/databases.

Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example:

- Gift Aid administration.
- External camp site or other activity bookings.
- Event registration
- Health and contact records forms (for events)
- Events coordination with event organisers

Paper records for events are used rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available. We will minimise the use of paper to only what is required for the event.

Further processing

If we wish to use personal data for a new purpose, not covered by this Data Protection Policy, then we will provide 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 prior consent to the new processing.

How we provide this privacy notice

A link to this website page is provided to those whose data is being processed by us.

Data Subjects rights

Data Subjects have the right to object to how we process their personal information. They may 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 Information Commissioner's Office (www.ico.org.uk).

Unless subject to an exemption under the GDPR and DPA 2018, data subjects have the following rights with respect to personal data:

The right to be informed	the right to know how we will use your data.
The right to access your personal data	can ask us to share the data we have about you. This is a Data Subject Access Request.
The right to rectification	this just means update data if it's inaccurate or if something is missing. Adult volunteers will be able to edit and update some information directly on The Scout Association's membership system.
The right to erasure	this means the right to request that we delete any personal data we have. There are some exceptions, for example, some information will be held by The Scout Association for legal reasons.
The right to restrict processing	if we are not processing your data in line with this privacy notice then the right to restrict any further use of that data until the issue is resolved.
The right to data portability	this means that we will have to share your data with you in a way that can be read digitally such as a pdf. This makes it easier to share information with others.
The right to object	object to the ways your data is being used.
Rights in relation to automated decision making and profiling	this protects cases where decisions are being made based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by us.



Website Cookies

Forms related Cookies.

When submitting data through a form such as those found on our contact pages or comment forms, cookies may be set to remember user details for future correspondence.

Who to contact.

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact Horsham District Scout Trustee Boards Data Lead.

Version number and date of the last review.

Version	Details of Revision	Date Approved by Trustees
2.0	Major revision to reflect new organisational changes.	31/10/2024