

# General Data Protection Policy

## Context and overview

### Key details

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## Introduction

Thorrington Scout Camp (TSC) needs to gather and use certain information about individuals and groups.

These can include young people, parents, volunteers and other people the organisation has a relationship with, or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet TSC's data protection standards, and to comply with the law.

## Why this policy exists

This data protection policy ensures Thorrington Scout Camp:

- Complies with data protection law and follows good practice
- Protects the rights of young people, parents and volunteers
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

## Data

### How we gather your data

When taking out an adult role within Thorrington Scout Camp you will be required to provide your name, address, telephone number and date of birth. This information will be inputted and stored on the Scout Association 'Compass' website. In addition, you will be required to provide formal identification and undergo a Disclosure and Barring Service (DBS) check to ensure you are able to work with young people. You will be required to submit this information to DBS system upon receipt of an email offering you to sign up to be checked. We do not store this information. Your contact telephone number and email address will be made available to other leaders in the District & County so that they can contact you with important email updates.

When you make a booking enquiry to stay at Thorrington Scout Camp you will be required to provide your name, telephone number and email address. This information will be held on a booking spreadsheet and Campman camp site booking system, but all details will be deleted at the end of the year following your camp. Details are only held for this time to ensure all bills are settled. Should payments not be received within this time frame, then your details will be held until your account is settled.



## Data protection law

The Data Protection Act 1998 describes how organisations - including Thorrington Scout Camp - must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

## People, risks and responsibilities

### Policy scope

This policy applies to:

- The head office of Thorrington Scout Camp
- All volunteers of Thorrington Scout Camp
- All contractors, suppliers and other people working on behalf of Thorrington Scout Camp.
- All individuals booking to stay at Thorrington Scout Camp.

It applies to all data that TSC holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of young people and volunteers who are members of TSC (or looking to join TSC within the next few months)
- Postal address of parents, volunteers and site users
- Email addresses of parents, volunteers and site users



- Telephone numbers of parents, volunteers and site users
- Date of birth of young people and volunteers
- Any allergies, medical problems or disabilities that the young person may have
- Details of the young person's GP
- Details of the young person's religious beliefs

## Data protection risks

This policy helps to protect Thorrington Scout Camp from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the District uses data relating to them.
- Reputational damage. For instance, TSC could suffer if hackers successfully gained access to sensitive data.

## Responsibilities

Everyone who works for or with Thorrington Scout Camp has some responsibility for ensuring data is collected, stored and handled appropriately.

Each person that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- Thorrington Management Committee (TMC) Chairman, Bob Candler is ultimately responsible for ensuring that Thorrington Scout Camp meets its legal obligations.
- The two over riding District Commissioners for Colchester Estuary and Colchester North are responsible for ensuring the TMC meets it's legal requirements.

The TMC Chairman is responsible for:

- Reviewing all data protection procedures and related policies, in line with an agreed schedule
- Arranging data protection training and advice for the people covered by this policy where required
- Handling data protection questions from Volunteers and anyone else covered by this policy
- Dealing with requests from individuals to see the data Thorrington Scout Camp holds about them (also called 'subject access requests').



- Checking and approving any contracts or agreements with third parties that may handle the site's sensitive data.
  - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
  - Performing regular checks and scans to ensure security hardware and software is functioning properly, where required and where this is not already carried out by a 3rd party software provider
  - Evaluating any third-party services TSC is considering using to store or process data. For instance, cloud computing services.
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- The four Team Wardens are responsible for ensuring that each of their team members meet the legal requirements and undertake appropriate training.

## General Volunteers guidelines

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, Volunteers can request it from their line managers.
- Thorrington Scout Camp will provide training to all volunteers to help them understand their responsibilities when handling data.
- Volunteers should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Two-factor authorisation should be used wherever possible.
- Personal data should not be disclosed to unauthorised people, either within Thorrington Scout Camp or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Volunteers should request help from their Duty Warden or the data protection officer if they are unsure about any aspect of data protection.
- You must notify the Information Commissioner Office within 72 hours of any data breach, and you may also have to notify your young people, parents and volunteers.

## Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the data controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:



- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Volunteers should make sure paper and printouts are not left where unauthorised people could see them, like on a printer or open folder on a desk.
- Data printouts should be shredded and disposed of securely when no longer required.
- When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:
- Data should be protected by strong passwords that are changed regularly and never shared between Volunteers.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the District's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

## Data use

Personal data is of no value to Thorrington Scout Camp unless it can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, Volunteers should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. The Chairman or the two District Commissioners can explain how to send data to authorised external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- Volunteers should not save copies of personal data to their own computers. Always access and update the central copy of any data.



## Data accuracy

The law requires Thorrington Scout Camp to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Thorrington Scout Camp should put into ensuring its accuracy.

It is the responsibility of all Volunteers who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Volunteers should not create any unnecessary additional data sets.
- Volunteers should take every opportunity to ensure data is updated.
- Thorrington Scout Camp will make it easy for data subjects to update the information Thorrington Scout Camp holds about them. For instance, via the campsite's website.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

## Your right to access information we store about you (Subject Access Requests)

All individuals who are the subject of personal data held by Thorrington Scout Camp are entitled to:

- Ask what information Thorrington holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how Thorrington is meeting its data protection obligations

If an individual contacts Thorrington requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at [Stephen.deighton@essexscouts.org.uk](mailto:Stephen.deighton@essexscouts.org.uk). The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information. For example, requesting forms of photo identification such as a passport or drivers licence.



## Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Thorrington Scout Camp will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Scout Association and from the two Districts' legal advisers where necessary.

## Providing information

Thorrington Scout Camp aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, Thorrington Scout Camp has a privacy statement, setting out how data relating to individuals is used by Thorrington Scout Camp.

## Your right to rectification

Individuals have the right to have their information corrected if they believe it is factually inaccurate – this is known as the right to rectification.

## Your right to have data erased

The right to erasure is also known as 'the right to be forgotten'. In certain circumstances, it allows people to instruct organisations to delete or remove their personal data.

For example, if our website holds photographs of members at camp and 20 years later the photo is still there, the individual can ask for the picture to be deleted.

## Your right to object

We do not sell information to any third parties, except the Scout Association. You have the right to object to the processing of your personal data at any time.

## How long we keep your data

We only keep your data for the period that you are a member of Thorrington Scout Camp. Once you or your child leave TSC, the information is deleted and/or shredded.





For those booking to stay at Thorrington, your data will be deleted at the end of the year following your camp. Details are only held for this time to ensure all bills are settled. Should payments not be received within this time frame, then your details will be held until your account is settled.

## Third party applications and their GDPR policies

Thorrington Scout Camp use the following third party applications to store data or contact parents:

- € Online Scout Manager - <https://www.onlinescoutmanager.co.uk/security.html>
- € Compass - <http://scouts.org.uk/privacy-policy/>
- € Google Mail and Google Drive - <https://privacy.google.com/businesses/compliance/>
- € Disclosure and Barring Service - <https://www.gov.uk/government/publications/dbs-privacy-policies>
- € Campman Campsite booking system -
- € 123FormBuilder - <https://www.123formbuilder.com/privacy.html>

