

What is this privacy notice/policy?

This Data Privacy Notice/Policy describes the categories of personal data that The Southern Europe District Scout Council process and for what purposes. The Southern Europe District Scout Council 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 members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public who will make contact with The Southern Europe District Scout Council.

It is important to note that as Data Controllers, local Scout Groups are directly responsible for any personal data they process and must therefore ensure that they are aware of their responsibilities under the law.

Who we are?

The Southern Europe District Scout Council are a part of British Scouting Overseas (Charity Number: 1151702 – England & Wales) and subsequently The Scout Association (Charity numbers: 306101 – England and Wales, and SC038437 – Scotland). From this point on The Southern Europe District Scout Council will be referred to as “we”.

The Data Controller for The Southern Europe District Scout Council is the Executive Committee who are appointed at an Annual General Meeting and are Charity Trustees.

The data we may process

The majority of the personal information we hold, is provided to us directly by you or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership system Compass. In the case of adult members and 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 contact you.

Southern Europe District Privacy Policy

- 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 are able to 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 are able to pay any staff that might be employed by us, reimburse expenses and collect gift aid from HMRC where donations are made.
- Training records – so that members 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.

The lawful basis we process your data by

We comply with our obligations under the GDPR and DPA 2018 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.

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will mostly align to the lawful basis of legitimate activities of an association. Explicit consent is requested from parents/guardians to take photographs of our members. 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 volunteers in The Southern Europe District Scout Council.

Southern Europe District Privacy Policy

- 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 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 being run or attended by The Southern Europe District Scout Council to ensure and evidence your suitability if volunteering for a role in Scouting to contact your next of kin in the event of an emergency to ensure you 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 The Southern Europe District Scout Council
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting.

Our retention periods

We will keep certain types of information for different periods of time in line with the Scout Association Data retention Policy which can be found [here](#).

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

Sharing your information

1. Young people and other data subjects
 - We will normally only share personal information with adult volunteers holding an appointment in The Southern Europe District Scout Council.
2. 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 Southern Europe District Scout Council as well as with The Scout Association Headquarters as data controllers in common.
3. All data subjects
 - We will however share your personal information with others outside of The Southern Europe District Scout Council where we need meet a legal obligation. This may include The Scout Association and its insurance subsidiary (Unity Insurance Services), local authority services and law enforcement.

Southern Europe District Privacy Policy

- We will only share your personal information to the extent needed for those purposes.
- We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so.
- We will never sell your 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 would require us to provide contact details to that organisation.
- Where personal data is shared with third parties we will seek assurances that your 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.
- **Atlantic Data** – is the online platform used by The Scout Association for processing Disclosure applications.
- **Online Scout Manager (OSM)** – is an online membership system run by Online Youth Manager Ltd, this is a secure membership database where we store the personal information of Adults and Youth members for the day to day running of County Activities. Online Scout Manager's Security and GDPR information is available [here](#) .
- **Microsoft Office 365** – we utilise Office 365 for our email accounts and collection/storage of personal data. Microsoft has extensive expertise in protecting data, championing privacy, and complying with complex regulations, and currently complies with both EU-U.S. Privacy Shield and EU Model Clauses. They are committed to GDPR compliance across their cloud services and provide GDPR related assurances in their contractual commitments. Microsoft's Privacy Policy is available [here](#).

In addition, adult volunteers will 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
- 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 your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice 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.

How we provide this privacy notice

A link to this policy is provided to those whose data is being processed by us. The policy is also available on our website – <https://southerneurope-bso.org.uk/privacy-policy/>

Your rights

As a Data Subject, 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 Information Commissioner's Office www.ico.org.uk

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

- The right to be informed – you have a right to know how your data will be used by us.
- The right to access your personal data – you can ask us to share with you the data we have about you. This is a Data Subject Access Request.
- The right to rectification – this just means you can update your data if it's inaccurate or if something is missing. Adult members will be able to edit and update some information directly on The Scout Association's Compass membership system.
- The right to erasure – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held by The Scout Association for legal reasons.
- The right to restrict processing – if you think that we are not processing your data in line with this privacy notice then you have the right to restrict any further use of that data until the issue is resolved.
- The right to data portability – this means that if you ask us 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.

Southern Europe District Privacy Policy

- The right to object – you can object to the ways your data is being used.
- Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by us.

Website Cookies

1. Forms related cookies. When you submit data through a form such as those found on our contact pages or comment forms, cookies may be set to remember your user details for future correspondence.
2. Third Party Cookies. In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.
3. Tracking Cookies. The site only uses cookies to allow you to navigate the site successfully.

Who to contact?

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact

Version number and date of the last review

Version 1.0 – 22nd September 2021