North Richmond Guidelines for using and storing Personal Data – GRPR
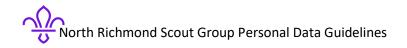
Here are the general rules to follow when using personal data, or communicating with members at North Richmond.

These guidelines should be read by all adults with access to personal information

- **GDPR Training**
  - **All Leaders with access to Personal Data (in paper or electronic form, e.g. OSM) should have compiled the Scouts GDPR training module**: https://members.scouts.org.uk/supportresources/4800/gdpr-training?cat=55,888&moduleID=10. (Once completed send your certificate to District Training to be added to your training record)
  - **All leaders should read the parents Privacy policy**, available in the shared OSM folder or available to download via the website: http://www.northrichmondscouts.org.uk/downloads.htm
  - **The General principles of GDPR are:**
    - ✓ 1. Any personal information must be stored securely (OSM, Online and Paper versions)
    - ✓ 2. The use of this data is only for that what it was intended.
    - ✓ 3. Data is not stored unnecessarily if it is no longer needed.
    - ✓ 4. Parents must have access if they ask to data held on them or their child.

- **OSM**
  - **Only Leaders and adults who require access to personal information should have this**
  - **Access to Personal information should only be for adults**, not young leaders
  - **Everyone who has access to the Leaders part of OSM should enable two factor authentication** to make sure their login is as secure as possible
    - ✓ Settings -> My Account Details –> Two Factor Authentication
  - **Care should be taken to keep personal information private**, and as much as possible only be accessed when you are in a private area. If you do need to access this information a public place, think of who else may be able to see the data - can you be overseen by people?

- **Email**
  - **Communications should be through Scout email addresses**, not personal email addresses.
  - **For your protection personal email addresses should not be given out publically**, use the generic email addresses e.g. cubs@northrichmondscouts.org.uk
  - **When emailing multiple parents, always use BCC** to keep email addresses private
  - Make sure nobody else other than the intended recipient can read emails with sensitive information
  - **Do not pass information onto a third party** without good reason
  - **Only pass on information to somebody else if it necessary** for an activity/event, e.g. emergency contacts or a site for camp; a list of names for an event.
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- **Paper Records**
  - **Emergency Contact list: 'The Black Folder'**
    - This should be stored in locked location.
    - Any Old pages, or pages no longer needed should be shredded. Note – There is now a shredder in the store room.

  - **New Joiner Forms**
    - Once data is added to OSM, these should be shredded. Please make sure the Acceptance of the data terms on the form (signature at the bottom) is indicated on OSM, and who signed it.

  - **Permission to Camp Forms**
    - All Permission to camp forms should be stored securely for at least six months after the camp on case of any issues arising from the camp, after this time they should be shredded as soon as possible unless there is any need for us to keep them. The group will check that all unrequired forms are shredded annually each summer.
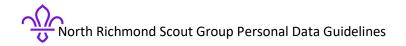
  - **All other forms**
    - The same principle should apply to all other forms, e.g. DBS forms, Young leader forms, etc – once they are no longer required they should be shredded

  - **Generally, any forms or paper information should be shredded after use,** not just thrown away

- **Census Data**
  - **Data for the Annual Scout census should remain anonymous**, and submitted through OSM by parents

- **Communicating**
  - In general, communication outside of section meeting should be with adults, not children
  - Arrangements about activities or events for Beaver Scouts and Cub Scouts should always be addressed to the parent or carer
  - Information for those in the Scout and Explorer/Young Leader ages may be sent to the young person themselves if necessary, with copies to their parents or carers.
  - If needing to communicate directly with a young person for an event or activity, permission must be gained from parents for the specific activity, and for what the appropriate forms of contact for that young person is.
  - Remember to be appropriate in how you communicate, e.g. not using messenger services like WhatsApp or similar with those under 13

- **Asking for and maintaining information**
  - **Consider purpose of why the information is needed** - is the data you are asking for adequate, relevant and necessary?
  - **Ensure data is accurate -** remind parents about updating OSM, particularly when a member changes section.
  - **Do not keep data longer than necessary**

- **The Group must have clear Data processing procedures & can demonstrate adults have been made aware of these**

- **For the Data we hold on members, members and parents have:**
  - **Right to be informed**
  - **The Right of Access**
  - **Right of Rectification**
  - **Right to Erasure**

- **Guidelines for putting information on the Website, Social media and online in general**

  - **Parents should give permission for photos to be used**, when joining the group this permission is given when parents sign the joining form, and this is then stored in OSM. Check OSM to see if this has been taken away.
  - **Do not label or identify photography of young people**
    - Do not use young people's full names, and avoid names where possible – e.g. 'The winner of the football competition', not 'the winner was Sarah Smith'
    - If names need to be used, shuffle the names if they coincide with photography
  - **Do not give out personal information on adults or young people** (e.g. email addresses or other contact details) without the express consent of the adult or parent of the child whose details you are giving out.
  - **All emails published publically from the group should be general email addresses** and not personal emails, e.g. info@northrichmondscouts.org.uk or beavers@northrichmondscouts.org.uk
  - **Do not publish exact details of meeting places and times.** Provide an email link to request more details
  - **Check that your photos or images:**
    - Meets the requirements of Scouting activity and other rules.
    - Ensure it is considered in good taste
    - Ensure that you own the image. Use free stock image libraries rather than gathering material from the internet.
  - **Don't provide parental detail on activities or events publically** – these should only be done via OSM. E.g. Family Camp, Activity days.
  - **Attendance on public events being shown online is fine**, e.g. advertising our May Fair stall, attendance at Remembrance Sunday Parade, etc.
  - **Any place for comment or chat related to the group, images or Scouting must be filtered or moderated to monitor use.**
  - **Do not use content that isn't yours without obtaining permission.**

- o **Remember being Age appropriate** – e.g. Facebook should not be used for communicating with those under 13
- o **Remember information on the Website, Internet and social Media is public** and you should treat putting information online in the same way as posting it on noticeboards all around Richmond!

Last updated July 2019