Data Protection & IT Security Policy
for Wiltshire Scouts

Issue 1 : 2018

About this policy

This Data Protection and IT Security policy applies to all operations of Wiltshire Scout County, including those at Wiltshire Scout Centre. It does not cover the operations of Districts and Groups, who should have their own policy.

The policy is designed to ensure that Wiltshire Scout County complies with its obligations under the Data Protection Act (to be replaced with the General Data Protection Regulation (GDPR) in 2018) and conforms to the following eight data protection principles:

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The County Secretary is the owner of this policy and responsible for its regular review (at least yearly) and update as necessary. The County Chair acts as our Data Protection Officer.

The personal data we hold

Data description	Personal data included	Stored using	Retention policy	Responsible officer
Information about our members	Contact information, appointments, training records, activity permits and awards.	For adult members - Compass membership management system, provided	Retained whilst a current member. A subset of data is retained	County Appointments Secretary

	(Includes sensitive data, as defined)	by UK Scout Association	when a membership ceases in order to support the vetting policy should the person reapply for membership	
	Details of criminal convictions	Paper copy in secure cabinet	Not Retained Locally – Only kept while Adverse Disclosure decision is in progress	County Secretary
Information about Safeguarding incidents	Contact information and information regarding the nature of any allegation, the status and outcome of the investigation	Paper, County email and Electronic Files (including SharePoint lists)	Not Retained Locally – Only kept while an investigation is in progress	County Commissioner
Information about our employees	Applications of jobs where candidate is unsuccessful		6 months after notifying candidate	County Chair
	Contact details, start dates, annual leave, TOIL, contract, references, copy of other relevant documentation (e.g. disciplinary letters) (Includes sensitive data, as defined)		5 years following the employee leaving employment	County Chair
	Contact details, salary and pension contribution information		Indefinitely	County Chair
	Copies of right to work checks, certificates and other physical documentation provided by employees		5 years following the employee leaving employment	County Chair
	Payroll information, including salary and other allowances, P60, P45, P11D and P6 notices.		7 years	County Chair

Information about accidents and near misses	Contact details and nature of accident	Paper form stored in County Office	3 years after end of investigation	County Secretary
Information about our event attendees	Name and address of group leader, name, DOB, special diet, medical info of each participant	Google forms	1 year from end of event. Aggregated summary statistics indefinitely.	County Secretary
	Name and address of group leader, name, DOB, special diet and medical condition of each participant	Google forms	1 year from end of event. Aggregated summary statistics indefinitely.	County Secretary
	Contact details, next of kin information, medical conditions and special diets. (Includes sensitive data, as defined)	Paper forms stored by Event manager	Destroyed after event, unless medical incident and then kept for 3 years.	County Secretary
Information about general enquirers	Contact information and nature of enquiry, which may contain personal data	County email account	Indefinitely	County Secretary
Information about complainants	Contact information and nature of complaint, which may contain personal data	County email account	Indefinitely	County Secretary
Information about our customers	Contact information	Paper forms stored in filing cabinet	1 year after booking occurs	WSC Manager
	Contact information	MRBS (3rd party system)	5 years after last booking occurs	WSC Manager
Information about people registered for our website	Contact information and which District they belong to	Wordpress / joomla	Indefinitely, unless the individual requests removal	Website Manager
Information about people registered to our mailing lists	Contact information	County email system	Indefinitely, unless the individual	County Communications Manager

			requests removal	
Credit card and bank details of customers and suppliers	PAN number, expiry date, CCV number, sort-code and account number	Not stored, other than by 3rd party merchant (e.g. Paypal or Worldpay)	As per merchant's policy	County Treasurer
CCTV	CCTV images from Wiltshire Scout Centre	On-site recording device, provided by 3rd party	30 calendar days	WSC Manager

For completeness, we also hold the following information which is not categorised as Personal Data but has the following retention policies applied:

Data description	Retention policy	Responsible officer
Finance – purchase ledgers, record of payments made, invoices, bank paying in counterfoils, bank statements, remittance advices, correspondence regarding donations, bank reconciliation.	7 years	County Treasurer
Finance – Receipt cash book and sales ledger	10 years	County Treasurer
Finance - Fixed assets register	Indefinitely	County Treasurer
Finance - Deed of covenant/Gift aid declaration and legacies	6 years after last payment made	County Treasurer
Buildings – Deeds of title	Indefinitely	County Treasurer
Buildings – Leases	15 years after expiry	County Treasurer
Buildings – Documentation regarding plant and machinery	Until 1 year after disposal	County Treasurer
Buildings – records of major refurbishments, warranties, planning consent, health & safety files.	13 years after completion of project	County Treasurer
Trustee's minutes	Indefinitely	County Secretary
Annual accounts and annual reports	Indefinitely	County Secretary
Investment and insurance policy records	7 years after disposal	County Treasurer

Insurance policies	Indefinately	County Secretary
Employer's Liability insurance certificate	40 years	County Secretary
Health and safety records	3 years	County Secretary
Contract with customers, suppliers or agents, licensing agreements, rental/ hire purchase agreements, indemnities and guarantees and other agreements or contracts	6 years are expiry or termination	County Secretary

Our Security Policies

The following security policies will apply to the storing of personal data as outlined in this policy. These security policies are mandatory.

Overarching policies

- **Need to know** – We only give people access to the data that they need to carry out their role. If people change roles, we review access accordingly.
- **Passwords** – We use systems that force complex password complexity. Changed regularly or set once and keep until you think the password has been compromised.
- **Commercially available software** – where possible we use third party software to store personal data.
- **Employment** – We ensure our employees are made aware of their data protection obligations through clauses in their contracts and details contained in the staff handbook.
- **Transporting data** – We only transport data using physical media if absolutely necessary and then using encrypted media only.
- **Education** – The GDPR Training Module is now a mandatory module for all appointments.
- **We keep people informed** – we tell people why we are collecting their data and how we use it, at the point in time we collect it.

Physical storage

- **Limiting storage** – We limit the amount of personal data we physical store to the absolute minimum. Only those with a need to know will have access to the data.
- **Locked** – Physical documents with personal data will be store in a locked cabinet. Those stored in the County Office will be protected by CCTV and an alarm system.

Corporate network

- **Boundary security** – Our corporate IT network at Wiltshire Scout Centre shall have a boundary firewall which restricts inbound access to those ports and protocols specifically approved, which is maintained and supported.
- **Internet filtering** – All internet traffic (including public Wi-Fi) shall be filtered to ensure that inappropriate websites cannot be accessed (such as pornography).
- **IT Security patching** – The latest available IT Security patches are installed regularly and automatically.
- **Virus -** A virus scanning service should be installed on all devices and regularly monitored.
- **Backup** – Our storage is backed up on-site each day.

Credit card information

- **PCI regulations** – We do not store payment card information on any of our systems or paper forms. If customers call to pay using a payment card, the details are directly entered into the PDQ machine and not written down.

Volunteer equipment

- **Virus -** A virus scanning service must be installed on all devices and regularly checked.
- **Encryption** – All devices are disk encrypted with disk encryption, such as Bitlocker.
- **Removable storage -** Removal devices that will contain personal data should be encrypted using Bitlocker or similar encryption.

Third parties

- **Third party processing** – Other than the Scout Association, we limit the use of third parties to process personal data collected by Wiltshire Scout County and only do so where we have the express permission of the County Chair.

- **Third party compliance** – We ensure third parties we contract with to store personal data comply with the principles of this policy, have an information security policy in place and ideally hold an information security standard (such as ISO 27001). Or Cyber Essentials/Essentials Plus?
- **Limiting exports** – When exporting data from third party systems (e.g. Compass), we only export the data we need for the purpose we need it for.
- **Google Docs (including Google Forms)** – We do not use Google Docs or Forms for the collation of personal information due to the data and forms collected being stored on users personal storage. If we need to use this functionality, we use Microsoft Forms (as part of our Office365 offering).

Consent

Where we do not have a lawful basis to hold or process data, we will seek the express consent of individuals to hold data about them. This will be by specific and unambiguous statements that must be opted-into on any forms (electronic or otherwise) and systems. In some circumstances due to the organisation of the Scouts, we ask our members to ensure they have express consent for the data they are submitting to us.

An example for an event we are organising:

"I consent to my name, date of birth, t-shirt size and information about my special diet to be used for the purposes of administering the event by ensuring that the correct security wristband is assigned, t-shirt ordered and meal options provided. We will not use this data for any other purpose than this event, except in aggregate to provide statistics for historical reference. We will delete this data one year after the event ends."

Data Subject Access Requests

Should a member of Wiltshire Scouts or a member of the public request a copy of any personal information which Wiltshire Scout County Council holds, then the following process should be followed:

- The individual should write to the County Secretary (secretary@wiltshirescouts.org.uk) outlining the personal data they are seeking to obtain.
- The County Secretary shall acknowledge the request by email.
- The County Secretary shall seek to verify the identity of the individual and that they are lawfully entitled to request a copy of the personal data. This may involve asking for information such as a membership number, date of birth, address, or documentary evidence.
- The County Secretary will collate the data requested, noting that we cannot provide data held by other organisations such as the Scout Association, Districts or Groups. The data should be carefully analysed to ensure it does not refer to any other individuals, in which case it should be redacted.
- Within 30 days of the receiving the request, the County Secretary will provide the data to the individual. This will normally be by email.
- There will be no charge.

For more information about our legal obligations, refer to the ICO website.

Right to erasure (Right to be forgotten)

Should a member of Wiltshire Scouts or a member of the public wish for their personal information to be erased, then the following process should be followed:

- The individual should write to the County Secretary (secretary@wiltshirescouts.org.uk) outlining the personal data they are seeking to erase.
- The County Secretary shall consult the County Chair and County Commissioner to make a decision as to whether the request should be processed. Guidance from the ICO should be followed. Whilst Wiltshire Scouts will not seek to refuse the request unreasonably, it has a number of statutory obligations to comply with and uses personal data as part of its vetting and safeguarding procedures.
- If it is deemed that the data shall be deleted, then the County Secretary will confirm to the individual the timescales involved and instruct the necessary responsible officer to delete it.

Correcting inaccurate personal data

Should a member of Wiltshire Scouts or a member of the public believe that information that we hold about them is inaccurate, they should write to the County Secretary (secretary@wiltshirescouts.org.uk) outlining the inaccuracy. The County Secretary will then seek to correct the data and confirm back to the individual.

Reporting a breach

A breach is defined as any event which "leads to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data". If a breach occurs, the County Secretary should be immediately informed (secretary@wiltshirescouts.org.uk).

The County Secretary (in consultation with the County Chair and County Commissioner) will need to consider if the breach is likely to "result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage". If it does, the ICO should be informed within 72 hours of the breach occurring.

If the breach results in a high risk to the rights of the individuals involved, they should also be informed directly.

County Website

The County shares a summary about the data it holds and how it processes it on its county website at https://www.wiltshirescouts.org.uk/about-us/data-protection/. The website also provides information on how to submit a data subject access request and right to be forgotten request.