

# **Bewl Water Scout and Guide Committee**

## **Privacy Notice**

### **Introduction**

Bewl Water Scout and Guide Committee provide canoe and sail training generally operating in accordance with policies as set out by The Scout Association, Girlguiding UK, Royal Yachting Association and British Canoeing.

This policy and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

### **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**Volunteers** - means anyone volunteering to help run the courses.

### **2. Who are we?**

Bewl Water Scout and Guide Committee is a registered charity with the Charity Commission for England and Wales, charity number 1137098. Bewl Water Scout and Guide Committee is the data controller, contact is the Chair, Jeff Ross-Myring. From this point on the Committee will be referred to as 'we'. This means we decide how your personal data is processed and for what purposes.

### **3. The purpose(s) of processing your personal data**

#### **Participants**

We use your personal data for the following purposes:

- To identify our participants and their leaders;
- To ensure course age limits are adhered to;

- To contact participants and their leaders regarding any bookings, payments or registrations;
- To ensure the safety of participants and to make sure we have sufficient information should an accident/incident occur;
- To process payments for courses;
- To know the skill level of participants;
- To keep leaders updated on events.

### **Volunteers**

- To identify volunteers to help run the courses;
- To ensure volunteer qualifications are current and relevant including first aid and DBS;
- To enable expenses to be paid to volunteers where applicable.

### **4. The categories of personal data concerned**

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

#### **Personal Data:**

- Basic information such as title, name, date of birth, address;
- Scout Association/Girlguiding UK membership details;
- Contact information such as email address, mobile number, home number;
- Emergency contact name and number;
- Payment details;
- Level of candidate experience/qualifications;
- Information relating to equipment requirements such as height and weight and ability to swim;
- Volunteers qualifications.

Special categories of data:

- Information to ensure participant and volunteer safety such as medical conditions, allergies and Special Educational Needs and Disabilities (SEND)
- Doctors details

We have obtained your personal data from online forms, phone, email or face to face communications. When collecting data for children this is only taken from the parent or legal guardian. For adults the data is either taken from the individual, participants, volunteers, family member or friend (when they are booking someone else onto a course).

### **5. What is our legal basis for processing your personal data?**

#### **a) Personal data (article 6 of GDPR)**

**Our lawful basis for processing your general personal data:**

<b>Lawful Basis as outlined in GDPR</b>	<b>Bewl Water Scout and Guide Committee's Application</b>
Consent of the data subject;	Participating in the course. Photographs of participants.
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Participating on a course.
Processing necessary to protect the vital interests of a data subject or another person	Emergency contact details, medical conditions and allergies.

Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	Emergency contact details, medical conditions and allergies. SEND
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## **b) Special categories of personal data (article 9 of GDPR)**

### **Our lawful basis for processing your special categories of data:**

Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	Medical conditions and allergies.
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## **6. Sharing your personal data**

To enable us to run courses using volunteers your personal data will be shared with members of the Committee and volunteers using private email addresses and being viewed on private computers and other devices. The data shared will be limited to that which is required to run the courses.

Your data may also be shared with

- Those responsible for managing Bewl Water;
- Scout Association/Girlguiding UK members or headquarters;
- Royal Yachting Association and/or British Canoeing acting as national governing bodies based in the United Kingdom who accredit and monitor instructors;
- Health and Safety Executive, Government Department based in the UK who require accident and incident reporting in certain circumstances;
- Medical Practitioners, 999, 111 based in the UK who provide medical information, guidance and assistance;
- Local Authority Designated Officer safeguarding;
- Insurance companies;
- Professional advisors such as lawyers and consultants

We don't share personal information with third parties except where expressly detailed or where required by law enforcement.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow those we share information with to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. How long do we keep your personal data?**

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

## Young people

<b>Data Process</b>	<b>Data Type</b>	<b>Retention</b>	<b>Justification</b>
<b>Participant enquiries</b>	Personal data Contact information	1 Year after enquiry or until young person attends a course, whichever is shorter	Only retained with consent of young person, if they wish to be kept informed
<b>Participant on a course</b>	Personal and Sensitive data (special category)	2 Years after the young person attends the course	Required for publishing future events
<b>Incident or Accident, with or without medical intervention</b>	Personal and Sensitive data	Until the young person is 25 or 7 years, whichever is greater	Legal claims raised against the incident
<b>Training records</b>	Personal data	2 Years after the young person leaves	Required for returning for further courses to connect them back to their training records

## Adult volunteers

<b>Data Process</b>	<b>Data Type</b>	<b>Retention</b>	<b>Justification</b>
<b>Volunteer enquiries</b>	Personal data Contact information	1 Year after enquiry or until adult volunteer helps on a course	Only retained with consent of young person, if they wish to be kept informed
<b>Volunteering on a course</b>	Personal and Sensitive data (special category)	5 Years after the adult last volunteered	Support the running of future courses
<b>Identity Checking Information/Safeguarding</b>	Personal data and Sensitive data (special category)	5 Years after the adult last volunteered	Required to verify that the identity has been checked.
<b>Incident or accident, with or without medical intervention</b>	Personal and Sensitive data	Until the adult volunteer is 25 or 7 years, whichever is greater	Legal claims raised against the incident

<b>Training records</b>	Personal data	5 Years after the adult last volunteered	Required for any re-volunteering to connect them back to their training records
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### Parents/Legal Guardians

<b>Data Process</b>	<b>Data Type</b>	<b>Retention</b>	<b>Justification</b>
<b>Participant enquiries</b>	Personal data Contact information	1 Year after enquiry	Only retained if parent/legal guardian wishes to be kept informed
<b>Child participates on a course</b>	Personal data	2 Years after the child attends the course	Required for publicising future events
<b>Incident or accident, involving child with or without medical intervention</b>	Personal and Sensitive data	Until the child is 25 or 7 years, whichever is greater	Legal claims raised against the incident

### 8. Providing us with your personal data

We collect your personal data as it is a requirement necessary to enter into a contract to participate in water activities run by Bewl Water Scout and Guide Committee. Should you fail to provide the data when requested, you will not be able to participate. Should you or your child remove consent for data sharing once you have booked on a course, the participant will not be able to take part and you may not receive a refund.

### 9. Website Third-party links outside of our control

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

### 10. Publicising for future events

Consent is requested on the application form to retain contact details to keep you informed of future events.

### 11. Your rights and your personal data

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

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;

- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority)); direct marketing and processing for the purposes of scientific/historical research and statistics).

We will always aim to comply with your request unless there is a legitimate reason for us to use your information or to comply with lawful obligations.

### **No fee required – with some expectations**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your requests in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **12. Data Security**

We limit access to your personal data to those committee members and relevant volunteers who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to duty of confidentiality.

Information must be available to all instructors and committee members, at all times, during the weekend in case of emergency. Given that the group will be camping, data will be stored in a box, which may not be locked, within the central tent. If the course is taking place at a different location or accommodation data will be stored in the most secure place available whilst keeping it accessible at all times in case of emergency.

## **13. Transfer of Data Abroad**

We do not transfer personal data to third parties outside the EEA.

## **14. Automated Decision Making**

We do not use any form of automated decision making.

## **15. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy 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.

## **16. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail.

## **17. How to make contact**

To exercise all relevant rights or make a query please contact Jeff Ross-Myring on [jrossmyring@btinternet.com](mailto:jrossmyring@btinternet.com)