



# GDPR Compliance

v1.1 November 2018

## Executive Summary

This document has been prepared by the County Chair, Ian Railton on behalf of the County Executive Committee and aims to document the County's data collection and processing activities and our compliance with the GDPR.

We consider the data we collect and process, the reasons for this collection and processing. We examine where this data is held, how it is kept secure, where the data came from and on what lawful basis we process it. In addition to this we provide details of our retention policies, our data breach response plan and how we handle subject access requests.

*This document has been prepared from a template produced by Shaun Jones, District Commissioner of Stockton, Thornaby & District and much of the information contained within it is based on information from the Information Commissioners Office (ICO) and guidance from The Scout Association in the form of the GDPR toolkit which was produced in partnership with Black Penny Consulting.*

Approved by the Trustees of Cleveland Scout Executive on 15<sup>th</sup> November 2018.

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## Organisational Details

### Organisation name and contact details

Cleveland Scouts  
c/o County Secretary  
16 Thweng Way  
Guisborough  
TS14 8BW

Email: sue.dunn@ntlworld.com

Tel: 01287 636692

### Person/s responsible for data protection

The charity trustees, otherwise referred to as the County Executive Committee.

## Purposes of Data Processing

The County collects and processes a variety of personal data for the purposes of facilitating a person's membership in Scouting or for providing services to another person or organisation. A short description of the reasons for processing this data is given under the headings of young people, adults and others below as the nature of this differs for each.

### Young People

Once a young person is a member of a Group the County processes data annually as part of the national Scout census this is to provide statistical information on the reach of Scouting across the UK and helps to facilitate appropriate insurance and resources.

From time to time the County will also collect and process data about young people already in groups in order to facilitate trips and other County led events.

As all safeguarding incidents, within the County, must be reported to the County Commissioner for referral to the Scout Association safeguarding team, by definition the County collects data relating to safeguarding incidents involving young people. This data is collected to ensure that the incident is recorded and dealt with by the necessary external agencies.

Generally, records are made if a young person suffers an accident or injury and are held by the group that they are a member of. However, from time to time, during County led activities, these records will be made and stored centrally.

### Adults

The County processes data in relation to:

a) Facilitate their membership of Scouting

The County collects and processes data about an individual when they submit such data via a 'want to join' enquiry. This data is processed to allow the adult to join Scouting and complete a DBS check as part of our safeguarding procedures.

The County collects and processes data relating to an adult volunteer's progress in their Scout leadership training. This is to ensure that they are completing the training and to ensure that relevant and appropriate support is offered to them as well leading to the gaining of Scout Association Awards and Permits.

Data is further processed as part of the annual national Scout census in order to provide statistical information on the reach of Scouting across the UK and helps to facilitate appropriate insurance and resources.

It is also processed as part of the safeguarding procedures when DBS checks are repeated at 5 yearly intervals.

Adult data is also processed to allow communication with them to provide information they may need as part of their role including the advertising of meetings and activities that they and/or their sections may wish to participate in.

Adult names are recorded in minutes of meetings to register their attendance at such a meeting along with any particular proposals they have made at such meetings.

As all safeguarding incidents, within the County, must be reported to the County Commissioner for referral to the Scout Association safeguarding team, by definition the County collects data relating to safeguarding incidents involving volunteers. This data is collected to ensure that the incident is recorded and dealt with by the necessary external agencies.

Lastly, adult data is from time to time collected and processed to facilitate trips and other County led events.

b) Reimburse expenses.

To reimburse members who have bought approved items out of their own pocket for the purposes of Scouting e.g. items for a section meeting.

### Others

To facilitate a campsite booking

When a booking for Raven Gill Scout Campsite is submitted, we collect and process data about the person/organisation making the booking. This is to ensure that we are able to contact them regarding their booking.

## Categories of Personal Data Held

Note: \* denotes that special category data is included in the collection

Person Type	Purpose of Processing	Category of Individual	Categories of Personal Data	Who has access to this data?	Data storage	Recipients of that Data
Young person (All) *	National Scout census and provision of insurance and resources	Existing Member	<ul style="list-style-type: none"> <li>• DOB</li> <li>• Gender</li> <li>• Nationality</li> <li>• Additional needs</li> <li>• Ethnicity</li> <li>• Religion</li> </ul>	County census co-ordinator/s	<ul style="list-style-type: none"> <li>• Paper form</li> <li>• Spreadsheet</li> </ul>	The Scout Association
Young person*	Provision of trips and other County led activities	Existing Member	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• DOB</li> <li>• Additional needs</li> <li>• Emergency contact details</li> <li>• Health information</li> </ul>	Event leader/s	<ul style="list-style-type: none"> <li>• Paper form</li> <li>• Spreadsheet</li> </ul>	Cleveland Scouts
Young person*	The recording and reporting of accidents and injuries	Existing Member	<ul style="list-style-type: none"> <li>• Name</li> <li>• Accident/injury details</li> <li>• Any relevant health information</li> </ul>	<ul style="list-style-type: none"> <li>• Event leader/first aider (for County led events)</li> </ul>	<ul style="list-style-type: none"> <li>• Paper form</li> </ul>	The Scout Association (in cases where professional medical care has been sought)
Young Person	The recording and management of safeguarding incidents	Existing Member	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• DOB</li> <li>• Contact details</li> <li>• Incident details</li> </ul>	<ul style="list-style-type: none"> <li>• County Commissioner</li> <li>• Referring Leader (initially)</li> </ul>	<ul style="list-style-type: none"> <li>• Paper form</li> <li>• Email</li> <li>• Electronic form</li> </ul>	<ul style="list-style-type: none"> <li>• The Scout Association safeguarding team</li> <li>• External agencies as required</li> </ul>

Person Type	Purpose of Processing	Category of Individual	Categories of Personal Data	Who has access to this data?	Data storage	Recipients of that Data
Young Person	Recommendation for an Award	Existing member	<ul style="list-style-type: none"> <li>Name</li> <li>Scout Group</li> <li>Service</li> <li>Training</li> <li>Other interests outside Scouting</li> </ul>	County Commissioner  Awards Panel members	<ul style="list-style-type: none"> <li>Cloud</li> </ul>	The Scout Association
Adult	Joining Scouting	New member	<ul style="list-style-type: none"> <li>Name</li> <li>Phone number</li> <li>Email address</li> <li>Address</li> <li>Gender</li> <li>DOB</li> <li>Ethnicity</li> <li>Religion</li> <li>More details can be recorded on Compass but the County does not routinely collect these</li> </ul>	<ul style="list-style-type: none"> <li>County Appointments Secretary</li> <li>County Commissioner</li> <li>Group Scout Leader</li> <li>County Administrator</li> <li>Group Administrator</li> </ul>	<ul style="list-style-type: none"> <li>Paper form</li> <li>Compass</li> </ul>	<ul style="list-style-type: none"> <li>Compass/The Scout Association</li> <li>The receiving Scout Group/Section</li> </ul>
Adult	Joining Scouting	New member	<ul style="list-style-type: none"> <li>Name</li> <li>Phone number</li> <li>Email address</li> <li>Address</li> <li>Nationality</li> <li>DOB</li> <li>ID Document details (passport number, driving license number etc)</li> </ul>	<ul style="list-style-type: none"> <li>Person checking ID as part of DBS process</li> <li>Person entering details onto Atlantic Data as part of DBS process (if not the same person as above)</li> </ul>	<ul style="list-style-type: none"> <li>Paper form</li> <li>Atlantic data</li> </ul>	<ul style="list-style-type: none"> <li>Atlantic Data</li> <li>DBS</li> </ul>

Person Type	Purpose of Processing	Category of Individual	Categories of Personal Data	Who has access to this data?	Data storage	Recipients of that Data
Adult	Joining Scouting	New member	Criminal convictions	County Commissioner	<ul style="list-style-type: none"> <li>Paper form</li> </ul>	Shared internally with a small selection of appointments committee members to determine suitability
Adult	National Scout Census and provision of insurance and resources	Existing member	<ul style="list-style-type: none"> <li>DOB</li> <li>Gender</li> <li>Nationality</li> <li>Additional needs</li> </ul>	County Census Co-ordinator/s	<ul style="list-style-type: none"> <li>Paper form</li> <li>Spreadsheet</li> </ul>	The Scout Association
Adult	Renewal of DBS check	Existing member	<ul style="list-style-type: none"> <li>Name</li> <li>Phone number</li> <li>Email address</li> <li>Address</li> <li>Nationality</li> <li>DOB</li> </ul> ID Document details (passport number, driving license number etc)	<ul style="list-style-type: none"> <li>Person checking ID as part of DBS process</li> <li>Person entering details onto Atlantic Data as part of DBS process (if not the same person as above)</li> </ul>	<ul style="list-style-type: none"> <li>Paper form</li> <li>Atlantic data</li> </ul>	<ul style="list-style-type: none"> <li>Atlantic Data</li> <li>DBS</li> </ul>
Adult	Renewal of DBS check	Existing member	Criminal convictions	County Commissioner	<ul style="list-style-type: none"> <li>Paper form</li> </ul>	Shared internally with a small selection of appointments committee members to determine ongoing suitability

Person Type	Purpose of Processing	Category of Individual	Categories of Personal Data	Who has access to this data?	Data storage	Recipients of that Data
Adult	Recording a member's attendance and contributions to a meeting	Existing member	Name/Initials	<ul style="list-style-type: none"> <li>Attendees of the meeting</li> <li>County Commissioner</li> </ul>	<ul style="list-style-type: none"> <li>Email</li> <li>Paper form</li> </ul>	<ul style="list-style-type: none"> <li>Attendees of the meeting</li> <li>Those entitled to attend the meeting</li> </ul>
Adult	Recording a members training progress	Existing member	<ul style="list-style-type: none"> <li>Name</li> <li>Scout Group</li> <li>Modules completed</li> </ul>	County Training Manager	<ul style="list-style-type: none"> <li>Spreadsheet</li> <li>Compass</li> </ul>	None
Adult	Recommendation for an Award	Existing member	<ul style="list-style-type: none"> <li>Name</li> <li>Scout Group</li> <li>Service</li> <li>Training</li> <li>Other interests outside Scouting</li> </ul>	County Commissioner Awards Panel members County Secretary	<ul style="list-style-type: none"> <li>Cloud</li> </ul>	The Scout Association
Adult	Award of Activity Permit	Existing member	<ul style="list-style-type: none"> <li>Name</li> <li>Scout Group</li> <li>Training</li> <li>Assessor's recommendation</li> </ul>	County Commissioner Assessor	<ul style="list-style-type: none"> <li>Compass</li> <li>Paper form</li> </ul>	The Scout Association
Adult	Recording of DBS expiry dates	Existing member	<ul style="list-style-type: none"> <li>Name</li> <li>Role</li> <li>Scout Group</li> <li>DBS check issue date</li> <li>DBS check</li> </ul>	County Appointments Secretary	<ul style="list-style-type: none"> <li>Spreadsheet</li> </ul>	None



Person Type	Purpose of Processing	Category of Individual	Categories of Personal Data	Who has access to this data?	Data storage	Recipients of that Data
			expiry date			
Adult *	Provision of trips and other County led events	Existing member	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>DOB</li> <li>Emergency contact details</li> <li>Health information</li> </ul>	Event leader	<ul style="list-style-type: none"> <li>Paper form</li> <li>Spreadsheet</li> </ul>	Internal events team
Adult *	The recording and reporting of accidents and injuries	Existing Member	<ul style="list-style-type: none"> <li>Name</li> <li>Accident/injury details</li> <li>Any relevant health information</li> </ul>	<ul style="list-style-type: none"> <li>Event leader/first aider (for County led events)</li> <li>County Safety Adviser</li> </ul>	<ul style="list-style-type: none"> <li>Paper form</li> <li>Email</li> </ul>	The Scout Association (in cases where professional medical care has been sought)
Adult	The recording and management of safeguarding incidents	Existing Member	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>DOB</li> <li>Contact details</li> <li>Incident details</li> </ul>	<ul style="list-style-type: none"> <li>County Commissioner</li> <li>Referring Leader (initially)</li> </ul>	<ul style="list-style-type: none"> <li>Paper form</li> <li>Email</li> <li>Electronic form</li> </ul>	<ul style="list-style-type: none"> <li>The Scout Association safeguarding team</li> <li>External agencies as required</li> </ul>
Others	Campsite bookings	Non-member	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Email address</li> <li>Telephone number(s)</li> </ul>	<ul style="list-style-type: none"> <li>Raven Gill booking secretary</li> <li>Campsite wardens (name, email and telephone number(s) only)</li> </ul>	<ul style="list-style-type: none"> <li>Paper form</li> <li>Google Calendar</li> </ul>	None

## Transfer of Data Outside of the UK

The County does not consciously transfer any data outside of the UK. All third-party processors are either based in the UK or (in the case of Google, Microsoft and Drop Box) fully GDPR compliant with regard to transfer of data outside of the UK.

## Retention Schedules

Data type	Retention period	Storage media & Location
Census data	Data held as part of the Scout census is held until the County Census return has been submitted and has been approved by the County team. At this point all data, apart from the numbers of members, held solely for this purpose is deleted or destroyed	<ul style="list-style-type: none"> <li>• Spreadsheet – County census co-ordinator’s home</li> <li>• Paper form – County census co-ordinator’s home</li> </ul>
Adult member data	Data is retained on Compass until an adult member’s role is marked as closed at which point this becomes inaccessible to any person within the County and the retention policy of the Scout Association should be consulted for further details.	Online membership system - Compass
Adult criminal record history	Data is retained until appointments committee has considered the suitability of an applicant for an appointment in the County after which the data is destroyed.	Paper form – County Commissioner’s Home
Young person and adult trip or event data	Trip or event data is held for a period of no more than 3 months from the end of the event.	Paper form – Event leader’s home
Safeguarding incident data	This data is collected at the time that the incident is reported and held until such time as the Scout Association safeguarding team advise that the incident has been resolved and/or closed.	<ul style="list-style-type: none"> <li>• Paper form – reporting volunteer’s home</li> <li>• Paper form – County Commissioner’s home</li> <li>• Email</li> <li>• Electronic form – County Commissioner’s laptop</li> </ul>
Accident/injury records	To comply with relevant legislation, records of accidents/injuries will be held for a period of up to three years from the incident date (in the case of adults) and up until the individual affected reaches the age of 21 (in the case of young people) before being deleted or destroyed.	
Bank details	Bank account details are only held by the County Treasurer for the purpose of reimbursing adults approved expenses, until the adult ceases to hold an appointment.	County Treasurer’s laptop

Adult driving license/motor insurance data	An event leader knows that the adult/s driving a vehicle to an event has the appropriate driving license and insurance cover.	Event Leader
Bookings data	<p>Bookings data is held for a period of 3 years in electronic format in order to help identify booking trends and streamlining the repeat booking process.</p> <p>Some bookings data is held alongside the County accounts for a period of 7 years for the purposes of identifying a source of income in accordance with Charity Commission regulations.</p>	<ul style="list-style-type: none"> <li>• Paper Form – Raven Gill</li> <li>• Google Calendar</li> </ul>

## Technical and Organisational Security Measures

### Drop Box

Drop Box is a stand-alone cloud storage platform.

Users are required to have a password of at least 6 characters in length.

Drop Box can generally be assumed to be a secure means of data storage given its own encryption systems, password policy and back-up systems, it could however also be the target of large scale cyber-attacks.

### Facebook

The County makes use of closed Facebook groups. These Facebook groups are open only to volunteers and supporters of the County and as a closed group the content is only available to these group members. Visible to the public is simply a list of the people who are members of the group, this is controlled by Facebook and the County has no ability to change this. Facebook requires all users to have an individual username (usually tied to the user's email address) and a password to be able to log in. No sensitive personal information is posted on the County's Facebook groups, only users names and from time to time event photographs are visible to group members.

### Paper Forms

Paper forms are used to collect a variety of personal data, the retention and storage of these forms varies depending upon their purpose. Paper forms in long term storage are stored in locked cupboards to which only a given number of people have keys to access. Those which require regular access are stored with the person who requires access and the County recommends that they are stored within a locked container in the domestic environment.

Paper forms containing information about an adults criminal convictions are destroyed after use – either by means of shredding through a shredder or by burning.

The main risk to the security of paper based records is loss or theft. With this method of data storage the ability to search is incredibly manual and the ability to update very difficult both of which will take up large amounts of valuable volunteer time.

### Spreadsheets and other electronic forms

Spreadsheets and other electronic formats are used to hold all manner of data and are stored in a variety of different places across the County. The County recommends that all such data is password protected or stored on encrypted media (*ideally both*).

The biggest risk to the security of data stored in electronic form is the storage media that it is stored on. All data stored in electronic form should be stored in encrypted form and on encrypted media. Furthermore, access and amendment is not logged to a particular user.

### Compass

Compass is provided by The Scout Association for the purposes of collecting and storing all personal information about adult volunteers. The product uses SSL encryption and requires a username and password (which must be a mixture of upper and lowercase alphanumeric characters and special characters). Usernames and passwords are unique to individual users and each user has permission to view only the data that their role permits.

The Scout Association also act as a data controller with respect to adult volunteer data.

### Atlantic Data

Atlantic Data is a system provided by The Scout Association for the purposes of applying for DBS checks for adult volunteers. The product uses SSL encryption and requires a username and password (which must be a mixture of upper and lowercase alphanumeric characters and special characters). Passwords must be changed every 90 days and users cannot reuse a previous password. Usernames and passwords are unique to individual users and each user has permission to view/enter only the data that their role permits.

The Scout Association also act as a data controller with respect to adult volunteer data.

## Lawful Basis for Processing

Process	Purpose of processing	Category of personal information	Data captured to drive categorisation	Retention policy	Lawful basis for processing	Approved by and when?
Young member Scout Census	A young person's details are shared as part of the national Scout census	Sensitive personal data	<ul style="list-style-type: none"> <li>• DOB</li> <li>• Gender</li> <li>• Nationality</li> <li>• Additional needs</li> <li>• Ethnicity</li> <li>• Religion</li> </ul>	Data is held until the County census return has been completed and approved by the County team before being deleted and/or destroyed	Legitimate interests – this data is required to ensure that: <ul style="list-style-type: none"> <li>• Insurance cover is in place</li> <li>• Appropriate support is offered to adult volunteers to help them support young people from particular nations or with additional needs</li> </ul>	
Safeguarding incident management	Details of any safeguarding incidents are collected so that they can be referred to the Scout Association safeguarding team for investigation and further referral to the necessary external organisations	Sensitive personal data	<ul style="list-style-type: none"> <li>• Names of persons involved</li> <li>• Nature of incident</li> <li>• Contact details for persons involved (and/or their parents)</li> <li>• Other details as relevant to the incident</li> </ul>	Note: further guidance as to if and for how long safeguarding data should be held for after the incident is concluded is still being sought from the Scout Association	<ul style="list-style-type: none"> <li>• Vital interests – the collection of this data is necessary to protect the interests of the individuals involved and ensure appropriate action is taken</li> <li>• Legitimate interests – it is necessary to collect this data in order to safeguard the other people in our care from any impact the incident may have upon them</li> <li>• Legal obligation – in the event that the incident involves criminal proceedings we may be</li> </ul>	

Process	Purpose of processing	Category of personal information	Data captured to drive categorisation	Retention policy	Lawful basis for processing	Approved by and when?
					required to provide this information as evidence to the necessary authorities	
Accident or injury management	In the event of an accident or injury details are recorded of the incident, the actions taken and (in the event of professional medical treatment being required) passed to the Scout Association as our insurers	Sensitive personal data	<ul style="list-style-type: none"> <li>Names of persons involved</li> <li>Details of accident or injury</li> <li>Relevant health information (i.e. prior conditions that may have had an effect)</li> </ul>	Data is held for a period of three years from the date of the incident or until the 21 <sup>st</sup> birthday of the individual involved whichever is the later.	<ul style="list-style-type: none"> <li>Vital interests – it is in the vital interests of the person involved in the incident to ensure that the nature of the incident and the actions taken are recorded.</li> <li>Legitimate interests – it is in the legitimate interests of the County to ensure that accidents and the actions taken are recorded so as to help in the event of any claim made against the County</li> </ul>	
Cheque payments	To make payments to the County	Personal data	<ul style="list-style-type: none"> <li>Name</li> <li>Bank account details</li> </ul>	Data is retained until such time as the cheque is paid into the relevant bank account at which point we no longer hold the data	<ul style="list-style-type: none"> <li>Consent – the subject has given us consent by choosing this method of payment</li> <li>Legitimate interests – we need to take payments in order to be able to provide products or events</li> </ul>	

Process	Purpose of processing	Category of personal information	Data captured to drive categorisation	Retention policy	Lawful basis for processing	Approved by and when?
Adult volunteer joining	Adult volunteer details are collected as part of the joining process	Sensitive personal data	<ul style="list-style-type: none"> <li>Name</li> <li>Phone number</li> <li>Email address</li> <li>Address</li> <li>Nationality</li> <li>DOB</li> <li>Ethnicity</li> <li>Religion</li> </ul>	Data is accessible to the County on Compass until the adult leaves the movement and their role(s) are marked as closed	<ul style="list-style-type: none"> <li>Consent – the subject has given consent to process the data</li> <li>Contract – certain steps must be taken before an adult can become a member</li> </ul>	
Adult appointments	Adult volunteers criminal offence data is shared with the County by the Scout Association so that an appointments committee can determine that adult's suitability to be a volunteer	Criminal offence data	<ul style="list-style-type: none"> <li>Name</li> <li>Criminal offence data</li> </ul>	Data is held until appointment is approved or rejected and then destroyed either by way of shredding or burning	Legitimate interests - It is necessary to process this data to safeguard the young people in our care	
Raven Gill Campsite Bookings	An adult's details are collected to process a campsite booking	Personal data	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Email address</li> <li>Telephone number(s)</li> </ul>	Data is held for a period of no more than 3 years in electronic form however paper copies of booking data are held with the County accounts for a period of 7 years in line with Charity Commission regulations.	Contract – It is necessary collect and process this information for the County to be able to provide a service to the subject	

## Risk Register

Area to which risk applies	Owner of risk and its mitigation	Description of risk	Risk rating <small>(based on impact of risk)</small>	Description of recommended management or mitigation of risk	Cost impact	Mitigation option chosen (colour indicates residual risk)
<ul style="list-style-type: none"> <li>County</li> </ul>	County Executive Committee	Maintenance of lawful processing records – this is to be an ongoing effort	Medium	Review all data capture systems and develop a system for maintaining records of lawful processing	None	Initial records of data processing records created as per this document. To be reviewed at each Executive meeting for first year with this period reviewed in 1 year.
<ul style="list-style-type: none"> <li>County</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	<ul style="list-style-type: none"> <li>County Executive Committee</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	County owned computer equipment holding personal sensitive data do not have strong passwords	High	Implement passwords on all County owned devices	None	All County owned equipment to have passwords applied
<ul style="list-style-type: none"> <li>County</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	<ul style="list-style-type: none"> <li>County Executive Committee</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	Privately owned computer equipment holding personal sensitive data do not have strong passwords	High	Recommend that all privately owned devices holding personal sensitive data are protected by a strong password.	None	Recommendation made to all members of the County team holding personal data to protect personal devices with a strong password
<ul style="list-style-type: none"> <li>County</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	<ul style="list-style-type: none"> <li>County Executive Committee</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	County owned computer equipment holding personal sensitive data has no local encryption	High	Encrypt County owned devices either by upgrading to newer professional grade equipment or by the use of a third party application.	None to Medium	All County owned devices to be encrypted



Area to which risk applies	Owner of risk and its mitigation	Description of risk	Risk rating <small>(based on impact of risk)</small>	Description of recommended management or mitigation of risk	Cost impact	Mitigation option chosen (colour indicates residual risk)
<ul style="list-style-type: none"> <li>County</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	<ul style="list-style-type: none"> <li>County Executive Committee</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	Privately owned computer equipment holding personal sensitive data has no local encryption	High	Recommend that all privately owned devices are encrypted using the tools built into the Windows and Mac operating systems or by using a third party application.	None	Recommendation made to all members of the County team holding personal data to encrypt personal devices using appropriate software tools
All levels	County Executive Committee and County Team	Ensuring that all adults handling personal data have sufficient technical skill to ensure electronic data is secured in storage and in transit	Medium	<ul style="list-style-type: none"> <li>Provide training for adults on appropriate data protection techniques.</li> <li>Provide training to aid data protection.</li> </ul>	Low	Training session to be arranged to highlight the importance of data protection and the technical measures available for data protection.
<ul style="list-style-type: none"> <li>County</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	<ul style="list-style-type: none"> <li>County Executive Committee</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	Paper based records are held in a variety of locations	High	Review use of paper records. Could these be entirely replaced with an electronic system? Could paper forms be scanned and stored in cloud storage with paper forms being destroyed after scanning?	Low	Long term review of the use of paper records

Area to which risk applies	Owner of risk and its mitigation	Description of risk	Risk rating <small>(based on impact of risk)</small>	Description of recommended management or mitigation of risk	Cost impact	Mitigation option chosen (colour indicates residual risk)
<ul style="list-style-type: none"> <li>County</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	<ul style="list-style-type: none"> <li>County Executive Committee</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	Privacy policies at data capture point not transparent enough or ability to opt in to further communication omitted	High	Develop and circulate a range of standard privacy policy notices that can be amended to suit various data capture points	None	Review and trial privacy notices range of standard amendable notices
<ul style="list-style-type: none"> <li>County</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	<ul style="list-style-type: none"> <li>County Executive Committee</li> <li>Training Team</li> <li>Activity Teams</li> </ul>	Data captured is kept forever with no defined policies for retention	High	Set retention policies and ensure these are communicated to all relevant parties	None	Retention policies have been set and approved by the trustees as given elsewhere in this document. These are communicated to all and reduce this risk to low.
County	County Executive Committee	Multiple data sources mean that it will be difficult to delete, change or supply personal data on the request of the data subject	Medium	Aim for a standard model of data storage taking privacy and ease of use into consideration	Low	Long term data storage review

## Automated Decision Making

The County does not use any automated decision making systems.

The only automated process is within Atlantic Data where by the person inputting the ID documents selects from a list the ID that the applicant has provided and when an adequate ID has been selected the process is allowed to continue; this is simply a convenience feature and not a decision that is made about the applicant.

## Sources of Personal Data

All personal data is provided by the individual (or their parent in the case of a young person).

## Individual's Rights

### The right to be informed

Data subjects have the right to be informed about the collection and use of their data. The County gives clear information regarding, the purpose for processing, the retention period and who the data will be shared with at the point of collection.

### The right to access

Data subjects have the right to access their personal data and/or confirm that their data is being processed. The County has a procedure for dealing with Subject Access Requests, this is detailed later in this document.

### The right to rectification

Data subjects have the right to request that inaccurate personal data be corrected or completed where incomplete. This request can be made verbally or in writing.

### The right to erasure

Data subjects have "the right to be forgotten" or to have their personal data erased, this request can again be made verbally or in writing. This right can be exercised if:

- the personal data is no longer necessary for which we originally collected it
- the data subject withdraws their consent when consent is the only legal basis on which we collected the data
- where legitimate interests in the legal basis on which we collected the data and this interest no longer exists

### The right to restrict processing

Individuals have the right to restrict the processing of their personal data. In these circumstances, we are permitted to store the data but not use it. This request can be made in writing or verbally. This right only applies in the following circumstances:

- The data subject is contesting the accuracy of their data and we are verifying the accuracy
- The data has been unlawfully processed and the individual opposes erasure and requests restriction instead
- We no longer need the data but the data subject needs us to keep it in order to establish, exercise or defend a legal claim.
- The data subject has objected to our processing of their data under Article 21(1) and we are considering whether our legitimate grounds override those of the data subject

In order to restrict processing we will ensure that the request is noted and that any data we hold in paper form is moved to one side so that it is not processed with other data. We will

ensure that electronic data is filed together and that access is restricted to a limited set of users.

### The right to object

Data subjects have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

We will consider all objections however we may continue to process the data if we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or the processing is for the exercise or defence of a legal claim. If an objection is upheld we will cease to process the individual's data.

## Data Breach Response Plan

The County Executive Committee is responsible for the security, integrity and confidentiality of all the data it holds. Under the GDPR it is obliged to keep that data safe and secure at all times. They are also responsible for the management of data breaches.

Any person who knows or suspects that a breach of data security has occurred should report the breach immediately according to this plan. It is vital that action is taken promptly in the event of any actual, potential or suspected breaches of data security or confidentiality so as to avoid the risk of harm to young people or adult volunteers, damage to operations, financial, legal and reputational costs.

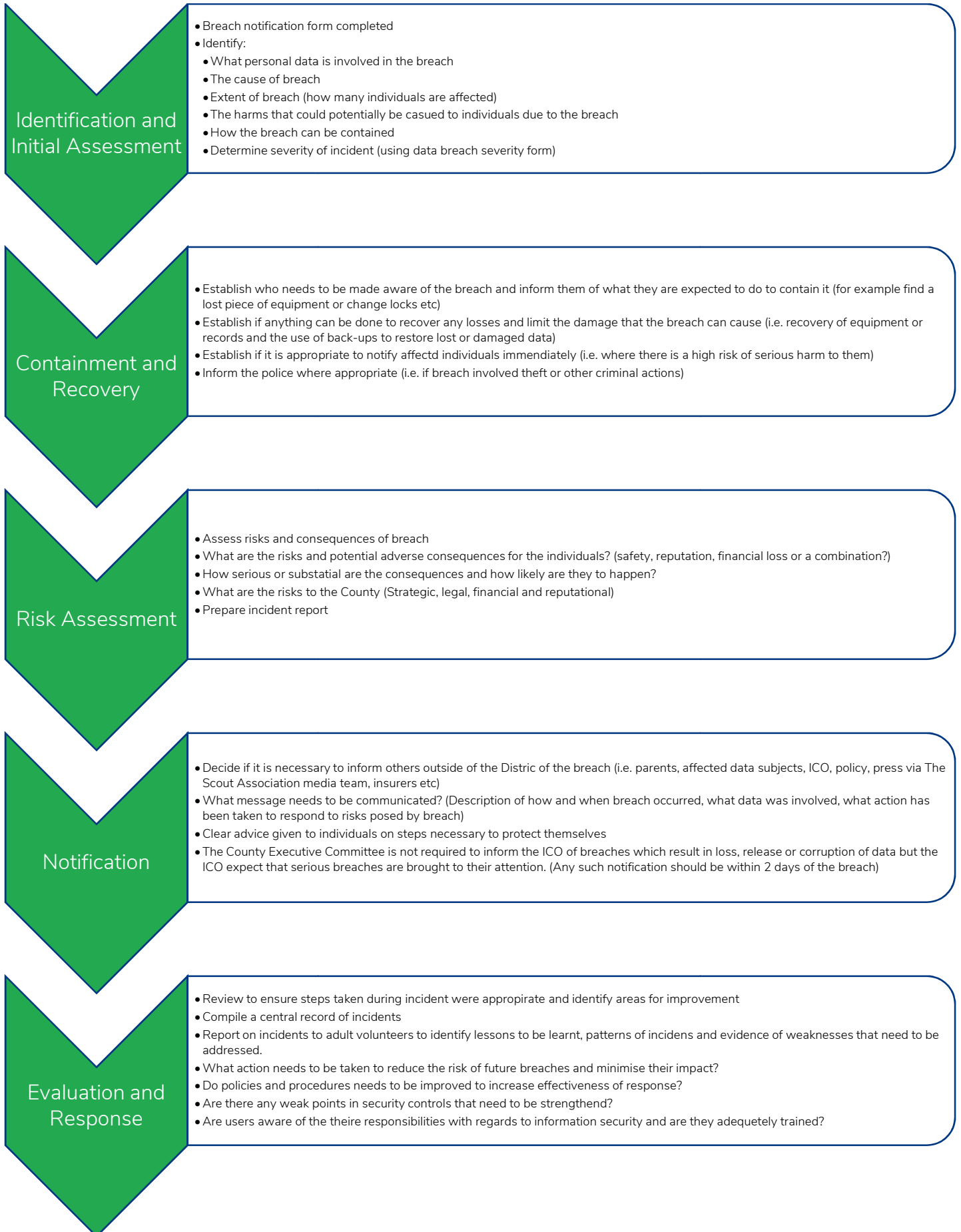
### Defining a data breach

A data breach is any event that has the potential to affect the confidentiality, integrity or availability of personal data held by the County in any format. They can happen for a number of reasons including:

- Disclosure of data to unauthorised individuals
- Loss or theft of portable devices containing identifiable information
- Loss or theft of paper records
- Inappropriate access controls which allow unauthorised use of information
- Suspected breach of IT security
- Attempts to gain unauthorised access to IT systems
- Records altered or deleted without the authorisation of the data owner
- Viruses or other security attacks to computer systems
- Breaches of physical security
- Confidential information left unlocked in accessible areas
- Insecure disposal of confidential paper waste
- IT equipment left unattended whilst logged in without taking steps to prevent others accessing information
- Publication of confidential data on the internet in error and accidental disclosure of passwords
- Misdirected emails containing personal data

### The response plan

This plan applies to all personal data created or received by the County in any format regardless of where it is used and in the case of IT related breaches applies whether the data is stored on County owned devices or systems or personal devices.



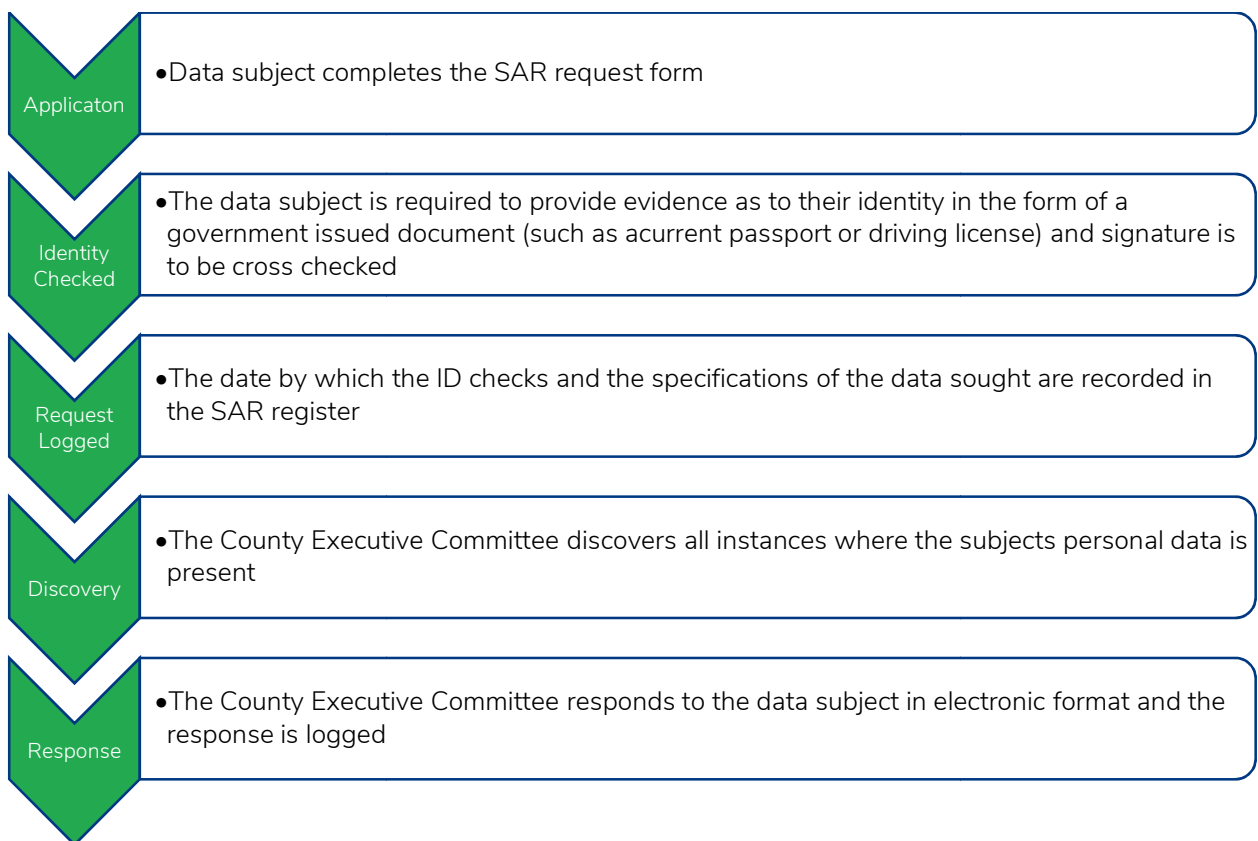
## Subject Access Requests

Data subjects have a right to ask for the information we hold on them through the Subject Access Request (SAR) process.

We are not obliged to provide this information if the request falls under any of the following exemptions:

- Crime prevention and detection
- Negotiations with the requester
- Information used for research, historical or statistical purposes
- Information covered by legal professional privilege

The SAR procedure is outlined here:



Whilst the County Executive Committee is responsible for handling all SAR's they will require help from other members of the County.

**Discovery:** the County will collect the data specified by the data subject or search all filing systems (electronic and paper based) in the County.

**Response:** The County Executive Committee will review all documents provided to identify whether any other third parties are identified within them and omit or redact the third-party information or seek written consent from the third-party for their identity to be shared.

All responses will be provided to the subject in electronic form. The data subject's name, list of items provided and date on which they were provided will be recorded

## Change Log

Version	Change/s	Date Issued
v1.0	Initial draft	Not yet issued
<b>V1.1</b>	Revised document approved by the County Executive 15.11.18	15.11.18



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