



Rugby District Scouts GDPR Policy

Revision C – Feb 2025

www.rugbyscouts.org.uk

1. Introduction

The aim of this policy is to set out some general rules and guidance, to ensure Rugby District Scouts align with the principles of the General Data Protection Regulation (GDPR).

GDPR stands for **General Data Protection Legislation**. It is a European Union (EU) law that came into effect on 25th May 2018. GDPR governs the way in which we can use, process, and store personal data (information about an identifiable, living person).

This policy will detail items such as:

- Use of Emails
- Use of WhatsApp Groups
- Use of Facebook Groups
- Use of Personal Information

2. GDPR Principles

There are seven (7) principles associated with GDPR: -

The Seven Principles

- Lawfulness, fairness and transparency.
- Purpose limitation.
- Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality (security)
- Accountability.

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Whilst this policy is not exhaustive, it aims to provide some simple guidance, to meet the seven (7) principals highlighted above.

3. Email Addresses

Individuals involved in Rugby District Scouts, should be encouraged to use a separate Scout email address, rather than their personal email address.

Please refer to the Rugby District Scouts Email policy for more information.

Email addresses for District Roles

Please refer to the Rugby District Scouts Email policy

Individuals performing District Roles, e.g., Lead Volunteer, District Treasurer etc, should be allocated a District email account, which should be used for all their activities within their District role.

If an email is sent to their personal email, they should reply using their District email account.

If personal emails are used, then these individuals should be BCC, so their details are not visible to all.

Email addresses for Group Roles

Individuals performing Group Roles, e.g., GSL, Chair etc, should be allocated a Group email address.

Individuals should be encouraged to use these email addresses, rather than relying on their personal emails address.

If personal emails are used, then these individuals should be BCC, so their details are not visible to all.

Please refer to the Rugby District Scouts Email policy for more information.

Email addresses for Individuals

It is possible for Rugby District Scouts to allocate emails to individuals, other than those not directly involved with District, e.g., Young Leaders.

Please refer to the Rugby District Scouts email policy for full information.

4. Use of WhatsApp Groups

WhatsApp Groups can be a very effective means of communication and allows quick and easy updates to be shared with a group of individuals.

However, when setting up a WhatsApp Group, permission should be obtained from everyone, in writing, prior to invitations being sent out.

So, to be clear

- Individuals must be asked their permission *prior* to them being invited to the Group.
- An opt-out system should be in use.

5. Facebook Groups

Facebook Groups (plus other Social Media Sites) can be a very effective means of communication and allows quick and easy updates to be shared with a group of individuals.

For example, Scout Groups regularly set up Facebook Groups to be able to communicate quickly and easily with parents and children.

Any Facebook Groups set up should be a 'closed group'. i.e., individuals must ask permission to join, and membership will only be granted if the individual have a legitimate reason for being granted access i.e., a Parent, or a Leader.

So, to be clear

- Facebook groups must be set up as 'closed' groups.
- Individual must apply for access, and access must be granted by an Admin.

6. Retaining Information

Basic principles

- Only ask for information that is needed for the task or role.
- Be clear what the information is going to be used for.
- Do not retain information for longer than is necessary.

An example: -

The Young Person/Adult Information Form may be the first data capture exercise for a new member. The form must state:

The purpose - What you are going to do with the form and the data.

Timeframe - How long you will hold onto the data (delete or securely destroy when no longer required).

The data collected must be:

Limited - It only includes what you need.

Kept secure - Special care taken in storing

7. Background Information and Links

As recommended by Warwickshire Scout Council

<https://www.scouts.org.uk/volunteers/running-things-locally/data-protection-and-record-management/>

<https://www.somersetscouts.org.uk/adult-support/support-information/gdpr>

<https://www.blackpennyconsulting.com/dpss/>

8. Outcome of Warwickshire Scout County Meeting, March 2022

AW raised an issue that PB had brought up last meeting with regards to GDPR. At present neither the county nor any of the districts have a GDPR manager in place. This would leave us in a very vulnerable position if any claim regarding data was made against an adult in scouting within the County.

Initially we would be able to go to the Scout Association for support, but they will expect us to have our own manager or advisor in place as this is a requirement. We need to look within the County to see if there is any one able to do the role but if not then we will have to look outside and there will be a cost element regardless. Based on the number of groups it will be about £14K a year, £15 per group per month.

Somerset County have produced a package of advice which will be shared along with the Scout Associations' information but until we have satisfied the requirement for a dedicated individual, we remain vulnerable.

AW requested that the District Reps take this back to their District Executive Meetings and see if we have anyone in Warwickshire who can help us.

We extended the above by a further six weeks at the June 2022 meeting, we can't keep extending it and just in case we think that the SA will support with any data breach fines:

"The cost of the actual fine is unlikely to be covered by any insurance policy. In a similar way to owning your own car, if you receive a parking ticket or speeding fine, your motor insurance policy would not cover the cost of fines. The Scouts would strongly suggest that all members complete the GDPR Training and review the guidance that has been made available".
Extract from the SA GDPR FAQs.

This is a responsibility to all executive committees; Group, District and County and the prosecution risk to individual members is real. Therefore, please raise the importance of this to all groups, especially trustees. Surely the threat of the ongoing £15pm fee will bring forth an alternative in at least some groups, if it doesn't already exist.

We now need to take the lead on this and if no further progress is made by our next meeting in January, I think that we should then recommend and support the Black Penny option county-wide, where each Group would need to register for the service and pay the relevant fees.

No further update has been received since this email.

9. Revision Status

| Rev | Comment | Date |
|------------|---|-------------|
| A | Initial Issue | 03 Jan 2024 |
| B | Minor updates | 03 Jan 2024 |
| C | Annual Review Minor updates throughout | Feb 2025 |
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