

---

## Policy Document:

### Data Protection Policy

*Last Updated: October 2021*

*Last Reviewed: October 2021*

#### **1. Introduction**

- 1.1. The General Data Protection Regulation (GDPR) is a legally binding document. This SSAGO Policy Document does not in any manner attempt to replace the aforementioned document. On any Data Protection issues you should always view the GDPR and are recommended to seek legal counsel.
- 1.2. This document details the principles operated nationally by SSAGO. Where a club maintains similar information it may consider this document as providing best practice in dealing with the information held covered by the GDPR.
- 1.3. If you have any queries with regards to the GDPR then please contact the SSAGO Executive Committee who can use their resources to seek legal guidance.

#### **2. The General Data Protection Regulation**

- 2.1. 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. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.
- 2.2. Examples of material covered by the GDPR include:
  - 2.2.1. SSAGO Health Forms
  - 2.2.2. SSAGO Event Records

#### **3. Information Maintained by SSAGO**

- 3.1. SSAGO nationally maintains the information described in the table on the following page. All information maintained by SSAGO is used to maintain membership details. This information is used for providing insurance for members, ensuring that it provides adequate child protection measures and, in the event of an emergency, have in place the required information to contact individuals.
- 3.2. No information is used for direct marketing or automatic decision making with the exception of Internet Based Data (cookies and sessions). Internet Based Data information makes use of automatic decision making to provide users of its website a personalised interface only. Data obtained by such means is not shared with any third party nor processed for any reasons other than a personalised user

interface.

	<b>Personal Data</b>	<b>Purpose</b>	<b>Duration</b>	<b>Sharing if required SSAGO will only share the information with:</b>
<b>InTouch Form</b>	Contact Information; Emergency Contact Information;  <b>Sensitive Data: Medical Information</b>	To have in place the necessary information for medical personnel and next of kin following an accident.	Maximum duration: until personal membership of club lapses although may be destroyed before	SSAGO Executive Committee; The Scout Association; Girlguiding UK; Medical Personnel; SSAGO's Insurers; Club Committee; Home Contact; Event organising committee; Event Staff (including First Aid staff and Activity Leaders);
<b>Event Records</b>	Date of Birth; Contact Information; Emergency Contact Information;	To have in place the necessary information to contact all those in attendance at an event given an issue post event that all attendees are required to be informed of. To have in place the necessary information for medical personnel and next of kin following an accident.	24 months	Event organising committee; Designated Home Contact; SSAGO Executive Committee; The Scout Association; Girlguiding UK; SSAGO's Insurers;
<b>Personal Details Form</b>	Name; Gender; Association; Username; Date of Birth; Contact Information; Scout Association Number;	Record that the subject is a member of the organisation	24 months after membership has lapsed	SSAGO Executive Committee; The Scout Association; Girlguiding UK; SSAGO's Insurers; Club committee;

<b>Club Committee Details</b>	Contact Information	Have in place the necessary contact information for members of the club executive.	Until notified of new committee details or when informed club has closed	SSAGO Executive Committee; The Scout Association; Girlguiding UK;
<b>Accident Report Forms Part A</b>		To maintain records of SSAGO's accidents for risk assessment and accident prevention	Organisation lifetime	SSAGO Executive Committee; SSAGO's Insurers;
<b>Accident Report Forms Part B</b>		To ensure the accident has been reported to SSAGO's insurers	Up until confirmation paperwork has been received by SAGO's insurers	SSAGO Executive Committee; SSAGO's Insurers; The Scout Association; Girlguiding UK;
<b>Internet Based Data (cookies, sessions, profiles)</b>	User Declared Information	Used to provide a personalised interface whilst using the organisation's website	Time defined by user settings	SSAGO Executive Committee;

#### **4. Sharing of Information with Third Parties**

- 4.1. SSAGO only supports the sharing of information with the following third parties
  - 4.1.1. The Scout Association
  - 4.1.2. Girlguiding UK
  - 4.1.3. SSAGO's Insurers
- 4.2. Information will not be shared with any other third party without the prior consent of the individuals involved, unless legally required.

#### **5. Information Life Span**

- 5.1. SSAGO maintains and recommends life spans for SSAGO material, as defined in the table above. After such time periods the information shall be scheduled for destruction. Destruction will take place at the earliest possible time, by the holder of the information, whilst following the guidelines presented in the Erasure and Destruction section.

#### **6. Erasure and Destruction**

- 6.1. At the request of Girlguiding UK, on environmental grounds, the permitted form of destruction for hardcopy information covered by the Data Protection Act 1998, is

for such information to be shredded.

- 6.2. For information stored electronically, it shall be deleted from the electronic media using appropriate method of erasure for that type of media.

## **7. Responsibilities**

- 7.1. We expect our volunteers, members and any providers we use to keep to the guidelines as set out in our Data Policy and under Information Commissioner's Office (ICO) guidance, the Data Protection Act 2018 and the GDPR when they are using or processing personal data and other confidential or sensitive information.
- 7.2. The SSAGO Executive Committee has overall responsibility for the organisation and for making sure that we keep to legal requirements, including data protection legislation.
- 7.3. SSAGO has appointed a Data Protection Officer to ensure the organisation is monitoring compliance with GDPR and other Data Protection laws. They are also responsible for data audits and training of the SSAGO Executive Committee. This role is filled by the SSAGO Webmaster and they are responsible for:
  - 7.3.1. making sure that this data protection policy is up to date
  - 7.3.2. advising you on data protection issues
  - 7.3.3. dealing with complaints about how we use personal and sensitive personal data
  - 7.3.4. reporting to the ICO, if appropriate, where we do not keep to any regulations or legislation
- 7.4. Where the SSAGO Webmaster position is vacant the role shall be filled in the interim by the SSAGO Secretary or other designated person co-opted by the SSAGO Executive Committee.

## **8. Dealing with National Data Protection Requests**

- 8.1. You are entitled to ask us, in writing, for a copy of the personal data we hold about you. This is known as a subject access request (SAR). In line with legislation, we will not charge a fee for this information and will respond to your request within one calendar month. This is unless this is not possible or deemed excessive, in which case we will contact you within one calendar month of making the SAR to state the reason for the extension and/or the charging of an appropriate fee.
- 8.2. Requests for access to records related to the requesting individual and for other information about those records maintained by SSAGO nationally should be directed to the SSAGO Executive, the preference is for SAR to be made by email to [committee@ssago.org](mailto:committee@ssago.org), however requests may be made in any valid way, including verbally or by post to the SSAGO Secretary. In situations where you feel SSAGO has not handled your personal data query/complaint appropriately you have the right to inform the ICO.
- 8.3. *Please note that your request must contain enough information such that you can accurately be identified as the individual, you may be required to provide further information, and the one calendar month timescale will not begin until this has been received.*
- 8.4. Where you make a SAR it may affect the timescales of complaints or other requests you have pending with SSAGO as these may be paused until the SAR is responded to as outlined in the respective policies.

## **9. Handling of Data Breaches**

- 9.1. If you become aware of a data breach, please inform the Data Protection Officer ([committee@ssago.org](mailto:committee@ssago.org)) immediately, who will advise you on who to proceed.