

This Data Protection Policy is provided for information only.

The 14th Bromley Scout Group ('the Group') holds personal data in respect of young people and adults, particularly where a young person is an active member of a Group section (i.e., a Squirrel, Beaver, Cub, Scout, or Explorer) or where an adult is an active volunteer with the group. The Group may also temporarily hold personal data provided where a young person or adult is not yet an active member, for example, data provided via a joining enquiry. The Group Trustee Board is the 'controller' of this data, meaning it holds ultimate responsibility for ensuring that it is kept secure and is not processed unlawfully.

The Group Lead Volunteer, Section Team Leaders, and other operational volunteers within the Group are the main processors of this data. Data processors process personal data on behalf of the controller. Online Scout Manager (OSM), a third-party system used for data storage, is also considered to be a data processor in respect of data provided relating to a young person/adult's membership of the Group (i.e., the data the Group collects and stores within the system). It should be noted, however, that data provided to OSM in order to set up an account is controlled by OSM. You can view OSM's Privacy Policy here: [Online Scout Manager \(OSM\): Privacy Policy](#). For adult volunteers with the Group, data may also be controlled and processed by The Scout Association (the national organisation to which the 14th Bromley belongs). You can view The Scout Association's Data Protection Policy here: <https://www.scouts.org.uk/about-us/policy/data-protection-policy/>. We do not routinely share data with The Scout Association relating to young people.

What is this Data Protection Policy?	This Data Protection Policy describes the categories of personal data that the 14th Bromley Scout Group processes and for what purposes. The 14th Bromley Scout Group is committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR. This Data Protection Policy applies to members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public who will contact 14th Bromley Scout Group.
Who we are	The 14th Bromley Scout Group is a registered charity with the Charity Commission for England & Wales; charity number 303551. The data controller for 14th Bromley Scout Group is the Group Trustee Board, who are appointed at an Annual General Meeting and are Charity Trustees. To get in contact with the Chair of the Board of Trustees, please email: Contact14thBromleyScoutGroup@gmail.com with the subject line, "FOR TRUSTEE CHAIR: [subject]"

	From this point on, the 14 th Bromley Scout Group will be referred to as “we”.
The data we may process	The majority of the personal information we hold is provided to us directly by you or by the parents or legal guardians of youth members, verbally or in paper form, digital form or via our online membership systems. The Privacy Notice for our youth membership system can be found here: https://www.onlinescoutmanager.co.uk/privacy.html In the case of adult members and volunteers, data may also be provided by third parties including The Scout Association (the national organisation to which the 14th Bromley belongs - you can view The Scout Associations Data Protection Policy here: https://www.scouts.org.uk/about-us/policy/data-protection-policy/) as well as the Disclosure and Barring Service (DBS). Where a member is under the age of eighteen, this information will only be obtained from a parent or guardian and cannot be provided by the young person. We may collect the following personal information: • Personal contact details such as name, title, address, telephone numbers, and personal email address - so that we can contact you. • Date of birth - so that we can ensure young people are allocated to the appropriate section for their age and that adults are old enough to take on an appointment with the Group. • Gender – so that we can address individuals correctly and accommodate for any specific needs. • Emergency contact information - so that we can contact someone in the event of an emergency. • Home contact telephone information – so that we can contact you regarding the running of the group, for example weekly meetings or camps, this may be processed through WhatsApp. • Government identification numbers e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks. • Bank account details and tax status information - so that we are able to reimburse any volunteers that are required to claim expenses from the group, pay contractors for services, and collect gift aid from HMRC where donations are made. • Training records - so that members can track their progression through the Scout Programme or Adult Training Scheme. • Race or ethnic origin - so that we can make suitable arrangements based on members cultural needs. • Health records - so that we can make suitable arrangements based on members' medical needs. • Criminal records checks - to ensure scouting is a safe space for young people and adults.

The lawful basis we process your data by	We comply with our obligations under the GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure; and by ensuring that appropriate technical measures are in place to protect personal data. In most cases the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will mostly align with the lawful basis of legitimate activities of an association. We use personal data for the following purposes: • To provide information about scout meetings, activities, training courses and events to our members and other volunteers in the 14th Bromley Scout Group. • To provide a voluntary service for the benefit of the public as specified in our constitution. • To administer membership records. • To fundraise and promote the interests of scouting. • To manage our volunteers. • To maintain our own accounts and records (including the processing of gift aid applications). • To inform you of news, events, activities and services being run or attended by the 14th Bromley Scout Group. • To ensure and evidence of your suitability for volunteering for a role in scouting. • To contact your next of kin in the event of an emergency. • To ensure you have and maintain the correct qualifications and skills. We use personal sensitive (special category) data for the following purposes: • For the protection of a person's health and safety whilst in the care of 14th Bromley Scout Group. • To respect a person's religious beliefs with regards to activities, food and holidays. • For equal opportunity monitoring and reporting.
Our retention periods	We will keep certain types of information for different periods of time in line with our Data Retention Policy. This can be found at https://www.14thbromleyscoutgroup.org/privacy-notice, or you can request a physical printed copy. This can take up to seven working days; we will aim to provide quicker than this.

	The Scout Association's Data Protection Policy can be found at: https://www.scouts.org.uk/about-us/policy/data-protection-policy/ and the Data Retention Policy can be found at: https://www.scouts.org.uk/about-us/policy/data-retention-policy/
Joint control of membership data	The Scout Association and 14th Bromley Scout Group process the data of members on our membership databases. Volunteer data is processed between the local scout groups and The Scout Association. Information The Scout Association and 14th Bromley Scout Group hold about volunteers may include the below (young people's data and data relating to the parents/guardians of youth members are only held by 14th Bromley Scout Group). • Name and contact details. • Length and periods of membership and volunteer service (and absence from membership and volunteer service). • Details of training received. • Details of experience, qualifications, occupation, skills and awards received. • Details of Scouting events and activities members have taken part in. • Details of next of kin. • Age/date of birth. • Legal sex. • Details of any health conditions. • Details of disclosure checks. • Any complaints we have received about the member. • Details of any safeguarding concerns raised about or by the member. • Details about role(s) in scouting. • Details about membership status. • Diversity and inclusion data (including nationality, ethnicity, religion/belief, health information, gender, and sexual orientation). Processing Activities

The following is a list of common data processing activities for members, parents/guardians of youth members, and volunteers' data on the membership systems. This includes an indication of which entity carries out this activity, which is shared with the other.

Processing Activity	Description	Processing entity
Scout Member Capture	Initial data load of a new Scout Member onto the membership database	14 th Bromley Scout Group
Scout Member Disclosure Check	Disclosure checks for any adult Scout Members who require them	The 14 th Bromley Scout Group initiate The Scout Association / Disclosure and Barring Service completes the check
Scout Member Operational Administration	This may include: Scout Member data updates Maintaining training record Events attended Permits approved Badges awarded	14 th Bromley Scout Group and The Scout Association
Scout Member Disciplinary	Scout Member disciplinary detail capturing where a Scout Member has	The 14 th Bromley Scout Group initiate

		breached Policy, Organisation and Rules (POR) or any other Scout policy	The Scout Association is involved if the severity meets a policy threshold
	Scout Member Leaving	The updating of an individual's membership status post leaving the association	14 th Bromley Scout Group
	Scout Member Data Reporting	Reporting on trends and monitoring data to be able to demonstrate the Scouts' impact and to attract funding (this may include optional special category data of the Scout Members)	The Scout Association 14 th Bromley Scout Group may access special category data for census returns and local scouting delivery
	Scout Member Training	The addition of mandatory training for Scout Members, where applicable	The Scout Association
	Scout Member Roles Definition	The definition of Scout Member roles on the membership databases	The Scout Association
Sharing your information	Young people and other data subjects We will normally only share personal information with adult volunteers holding an appointment in the 14 th Bromley Scout Group. Adult volunteers		

	We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association for the 14th Bromley Scout Group, as well as with The Scout Association Headquarters as independent data controllers. All data subjects We will, however, share your personal information with others outside of 14th Bromley Scout Group where we need to meet a legal obligation. This may include The Scout Association and its insurance subsidiary (Unity Insurance Services), local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes. We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so. We will never sell your personal information to any third party. Sometimes we may nominate a member for national awards (such as scouting awards, Duke of Edinburgh, or Jack Petchey awards), and such nominations may require us to provide contact details and award nomination details, such as citations to that organisation. We may also share data on award nominees for National Honours Awards, including the same data as above. Where personal data is shared with third parties, we will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR and DPA 2018.
How we store your personal data	We generally store personal information in the following ways: The Scout Association Online Membership System - this is used for the collection and storage of adult volunteer personal data. Online Scout Manager is the online membership system of Online Youth Manager. This system is used for the collection and storage of youth members' personal data.

Google Systems – This includes, but is not limited to, services like Gmail, Google Docs, Google Sheets, Google Forms, Google Calendar, and Google Photos. We configure these systems to minimise data sharing wherever possible through the available settings. You can review Google's data policy here: <https://policies.google.com/privacy?hl=en-US>.

Microsoft Software – this includes, but is not limited to, services like Outlook, Microsoft Word, Microsoft Excel, Microsoft PowerPoint, Microsoft SharePoint, Microsoft Access, Microsoft Teams, and Skype. We configure these systems to minimise data sharing wherever possible through the available settings. You can review Microsoft's data privacy statement here: <https://www.microsoft.com/en-gb/privacy/privacystatement>

Video Calls (Microsoft Teams, Skype, Zoom) - Adult volunteers may use secure video conferencing platforms, such as Microsoft Teams, Skype, and Zoom, for planning activities, coordinating events, and running meetings. These calls are restricted to invited participants and are protected using appropriate access controls, such as passwords or waiting room features. Only information necessary for the purpose of the meeting is shared, and where practical, data is anonymised.

These platforms may also be used for safeguarding discussions, trustee meetings, and operational planning relevant to the running of the Group. For safeguarding discussions, we may be obligated to provide sensitive data over these platforms; we will always meet our legal obligations when referring to safeguarding concerns.

A copy of Zoom's Privacy Notice can be seen here: <https://www.zoom.com/en/trust/privacy/privacy-statement/>

WhatsApp – Adult volunteers may share some personal data on WhatsApp to ensure safety or to coordinate events or meetings, either leading up to or after the event. In addition, adult volunteers may hold some personal data on local spreadsheets/databases. You can review WhatsApp's Data Policy here: <https://www.whatsapp.com/legal/privacy-policy?lang=en>

Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example:

- Gift Aid administration
- Event registration
- Health and contact records forms (for events)

	• Events coordination with event organisers Paper records for events are used rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available. We will minimise the use of paper to only what is required for the event and/or safe running of the group.
Further processing	If we wish to use your personal data for a new purpose, not covered by this Data Protection Policy, then we will provide you with new information or an updated policy explaining this new use before commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.
How we provide this Data Protection Policy	The Data Protection Policy can be accessed through our website; our website is publicly accessible and available to all members to view. This can be accessed at: https://www.14thbromleyscoutgroup.org/privacy-notice. A printed or large text version is available upon request – this may take up to 7 days to provide; however, we aim to act quicker than this. When we update our Data Protection Policy, we will share it with all members via their preferred method of communication.
Your rights	As a Data Subject, you have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the Information Commissioner's Office (www.ico.org.uk). Unless subject to an exemption under the GDPR and DPA 2018, you have the following rights with respect to your personal data: • The right to be informed – you have a right to know how your data will be used by us. • The right to access your personal data – you can ask us to share with you the data we have about you. This is a Data Subject Access Request. • The right to rectification – this just means you can update your data if it's inaccurate or if something is missing. Adult members will be able to edit and update some information directly on The Scout Association's online membership system. • The right to erasure – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held for legal reasons. • The right to restrict processing – if you think that we are not processing your data in line with this Data Protection Policy, then you have the right to restrict any further use of that data until the issue is resolved.

	• The right to data portability – this means that if you ask us, we will have to share your data with you in a way that can be read digitally – such as a pdf. This makes it easier to share information with others. • The right to object – you can object to the ways your data is being used. • Rights in relation to automated decision making and profiling – this protects you in cases where decisions are being made about you based entirely on automated processes rather than human input. It's highly unlikely that this will be used by us.
Photography & Media	Consent is requested from parents and legal guardians to use photographs where a member is the primary subject of the image. On occasion, we may rely on legitimate interest to process photographs, such as at large activities or events where it is not practical to collect and maintain individual consent. In these situations, we will clearly communicate that photography will take place and provide the opportunity to exercise data subject rights. We may use these images for displays at the Scout Hall, in Group literature such as camp newsletters, or on the Group website (www.14thbromleyscoutgroup.org). We retain photographs, correspondence, documents, and other records within our archive for periods exceeding 100 years when they hold long-term organisational, historical, or evidential value. This retention is carried out under the archiving-in-the-public-interest provisions of data-protection law. All archived materials are managed with appropriate safeguards to ensure compliance with GDPR, including secure storage, restricted access, and periodic review to confirm their continued archival relevance. For the Scouts section, photographs may also be shared within our closed Facebook group (14th Bromley Scout Group). Access to this group is by invitation only. Photographs may also be shared within the section parent/carer WhatsApp groups where the young person is present in the activity being shown. If you would prefer that photographs of your young person are not shared in this way, please inform the Section Team Leader at the earliest opportunity. You may withdraw this preference at any time.

	If you wish to fully opt out of photography usage, please contact the Trustee Board in writing along with the relevant Section Team Leader or any other adult volunteer. Withdrawal of consent prevents future use but may not require removal of previously printed or already shared materials. Where possible, we will remove any photographs you request; it is not possible to remove photographs already in the public domain or on printed documentation. For further information, please refer to the Data Retention Policy.
Communication Groups – WhatsApp	Each section uses WhatsApp group chats to share routine updates about weekly meetings, activities, and organisational information. These groups are used only for Scouting purposes. Parents and legal guardians are invited to join the group relevant to their young person's section. Participation is optional. Where parents choose not to join, alternative contact methods (such as email or direct message) will be used to ensure access to all necessary information. Access to the section WhatsApp groups is limited to team members and parents/carers within that section. Individuals are removed from the group when they leave the section or the Group. WhatsApp groups are not used as a record storage system. Information shared is limited to operational communication only. For Explorers, a separate WhatsApp group may be used, which includes young members. Young members are only added after explicit consent is provided by their parent or legal guardian. These groups are monitored by the Section Leadership Team, and messages must relate solely to Scouting activities and participation. If you are worried about how adult volunteers are communicating with your young person, please report this to The Scout Association and/or the Group Lead Volunteer. A full safeguarding policy is available upon request or can be found online at: https://www.scouts.org.uk/por/2a-key-policies/2a6-safeguarding-policy/ or physically within the Scout Hall on large yellow posters.
Website Cookies	Forms-related cookies When you submit data through a form such as those found on our contact pages or comment forms, cookies may be set to remember you and your user details for future correspondence.

Third-Party Cookies

In some special cases, we also use cookies provided by trusted third parties. The following section details which third-party cookies you might encounter through this site.

This site (<https://www.14thbromleyscoutgroup.org>) uses Google Analytics, which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit, so we can continue to produce engaging content. You have the right to refuse these cookies upon entry to the website and withdraw them at any time.

The current list, as of 08/11/2025, according to <https://support.wix.com/en/article/cookies-and-your-wix-site> of essential site cookies, which are compulsory to agree to when entering the website, is below:

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Cookie for fraud detection of calls	Session	Essential
hs	Security Cookie for Hive (legacy)	Session	Essential
svSession	Cookie for security, stability, and core site function	12 months	Essential
SSR-caching	Performance cookie for rendering	24 hours	Essential
TS*	Cookies for attack detection	Session	Essential
bSession	Used for system effectiveness measurement	24 hours	Essential
fedops.logger.sessionId	Tracking session errors and issues (resilience)	12 months	Essential
_wixAB3 *	Cookie for site experiments	6 months	Essential
server-session-bind	Cookie for API protection	Session	Essential
client-session-bind	Cookie for API protection	Session	Essential
oAuthState	Session cookie for identification	Session	Essential

	<table><tr><td>wixSession</td><td>Cookie for security, stability, and core site function</td><td>12 months</td><td>Essential</td></tr></table> To create the website, we have used Wix.com. If they update their cookies usage policy, we will update this Data Protection Policy as soon as feasible. To learn more about how online cookies work, please visit: https://allaboutcookies.org/ Cookies are not used to identify individual users on the website. For more information on Google Analytics cookies, see the official Google Privacy information page.	wixSession	Cookie for security, stability, and core site function	12 months	Essential
wixSession	Cookie for security, stability, and core site function	12 months	Essential		
Who to contact	If you have any queries relating to this Data Protection Policy or our use of your personal data, please contact us by writing to: Trustee Board of the 14th Bromley Scout Group Chair of the Board of Trustees Carey Scutt Hall Plaistow Lane Bromley BR1 3AR Or contact via email: Contact14thBromleyScoutGroup@gmail.com If you consider that your personal data has been misused or mishandled, you have the right to make a complaint to the Information Commissioner, who is an independent regulator. You can contact the Information Commissioner using the details below: The Office of the Information Commissioner Wycliffe House Water Lane Wilmslow				

	Cheshire SK9 5AF Telephone: 0303 123 1113 More information can be found on the Information Commissioner's Office website: Make a complaint ICO.
Version number and date of the last review	Version 2.01 - 18/06/2026 We may change or update this Data Protection Policy. In that case, the 'last updated' date in this field will also change. Any changes to this Data Protection Policy will apply to you and your data immediately. If these changes materially change how your personal data is processed, the 14th Bromley Scout Group will take reasonable steps to let you know.

Part of the training all adult members must complete from Scouting HQ is called 'Data Protection in Scouts', which is mandatory training. This must be recompleted every three years by our adult members, or on an Ad hoc basis if Scouting HQ determine there is a need for the training to be updated. This includes, but is not limited to, 'gathering data', 'storing and sharing data', 'data breaches and deletion' and 'data protection in Scout survey.' We have also used Scouting HQ's GDPR toolkit in the creation of this document, as well as in our everyday operations:

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

The Data Protection Policy and Data Retention Policy should be read together. Where any wording appears to differ between the two documents, 14th Bromley Scout Group will follow the approach that best meets current legal requirements and guidance issued by the Information Commissioner's Office (ICO). Both documents collectively set out how we handle, store, retain and delete personal data in line with the GDPR and Data Protection Act 2018.