

Data Protection Policy



This Policy applies only to the activities of Berkshire County Scout Council ("Berkshire Scouts"), and does not have onward implications for the actions of other data controllers such as Groups, Districts, or The Scout Association. The Trustees (the County Executive Committee) will review this Policy at least annually.

This Policy should be read in conjunction with the Privacy Statement, available at www.berkshirescouts.org.uk.

Lawful bases for processing

By joining a membership organisation such as The Scouts, adults and young people provide their data for a range of purposes. The processing of such data is therefore normally considered to be a legitimate interest, or in fulfilment of a contractual obligation. Occasionally individuals may also provide information for processing on the basis of consent.

County Events

County Events will ensure that they are compliant with this policy before, during and after. Event organisers will agree with the relevant member of the County Management Team how data will be processed and by whom. Consideration will be given to the bases for processing; data required to be collected; retention period of different types of data; and the secure destruction of data once the required period has passed.

Further clarification on data processing for County Events will be provided in Autumn 2018, following consultation with event leaders.

Data Processors

We use a number of organisations to process data on our behalf. Details of these are held in our Register of Data Processors.

Subject Access Request

Whenever a SAR is received, it must be notified immediately to the County Chair and County Commissioner. They will ensure that relevant people and systems are informed, and that an appropriate response is made to the Data Subject within one calendar month of the request. Depending on the nature of the SAR, the County Chair and County Commissioner may engage with external legal representation to ensure compliance.

Data Breaches

In the event of a suspected or verified data breach, the County Chairman and County Commissioner must be notified. Once established, they will ensure that we report the breach to the Information Commissioner's Office within 72 hours. Any appropriate mitigating steps will be put in place, including decisions to withdraw or suspend services as required. The County Chairman and County

Commissioner will further notify Unity Insurance. The County Administrator will keep a log of all suspected or verified data breaches together with actions taken.

Point of contact for data protection enquiries

Karen Thurlow, County Administrator, is the point of contact for any data protection enquiries.
countyadmin@berkshirescouts.org.uk

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