

# Scouts The Malverns Data Protection Policy

April 2026

Registered Charity Number: 1030019



## What is this Data Protection Policy?

This Data Protection Policy describes the categories of personal data The Malverns District Scout Council (the legal name of Scouts The Malverns) process and for what purposes. The Malverns District Scout Council are 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 European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR2.

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 make contact with The Malverns District Scout Council.

## Who we are

The Malverns District Scout Council are a registered charity with the Charity Commission for England & Wales; charity number 1030019.

The Data Controller for The Malverns District Scout Council is the Trustee Board who are appointed at an Annual General Meeting and are the Charity Trustees. The Chair of the Charity Trustees is can be contacted by email at [chair@scoutsmalvern.org.uk](mailto:chair@scoutsmalvern.org.uk) and they have assumed the role of Data Lead for the District.

From this point on The Malverns District Scout Council 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. This data protection policy applies to our youth membership as well as our adult members and volunteers. In the case of adult members and volunteers, data may also be provided by third parties, such as the England & Wales Disclosure and Barring Service (DBS).

Where a member is under the age of 18, 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 Scouting.
- Gender – so that we can address individuals correctly and accommodate for any specific needs.
- Emergency contact information - so that we are able to contact someone in the event of an emergency.
- 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 pay any expenses incurred 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 learning and training schemes.
- 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 to the lawful basis of legitimate activities of an association. Explicit consent is requested from parents/guardians to take photographs of our members, where such photographs place the data subject as the focal point of the shot. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

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 Malverns District Scout Council to provide a voluntary service for the benefit of the public in a particular geographical area 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 Malverns District Scout Council.

- To ensure and evidence your suitability if 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) data for the following purposes:

- For the protection of a person's health and safety whilst in the care of The Malverns District Scout Council.
- 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 The Scout Association's Data Retention Policy.

The Scout Association's Data Protection Policy can be found on their website by [clicking here](#) and the Data Retention Policy can be found on their website by [clicking here](#).

## Joint control of membership data

The Scout Association and The Malverns District Scout Council process the data of members, parents/guardians of youth members, and volunteers on our membership databases. Volunteer data is processed between the local Scout Groups and The Scout Association. Information The Scout Association and The Malverns District Scout Council hold about volunteers may include the following (members and parents/guardians of youth members data is only held by The Malverns District Scout Council):

- 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, volunteers data on the membership systems. This includes an indication of which entity carries out this activity which is shared with the other.

<b>Processing Activity</b>	<b>Description</b>	<b>Processing entity</b>
Scout Member capture	Initial data load of a new Scout Member onto the membership database	The Malverns District Scout Council
Scout Member disclosure check	Disclosure checks for any adult Scout Members that require them	The Malverns District Scout Council initiate The Scout Association complete the check
Scout Member operational administration	This may include: Scout Member data updates Maintaining training record Events attended Permits approved Badges awarded	The Malverns District Scout Council and The Scout Association
Scout Member disciplinary	Scout Member disciplinary detail capturing where a Scout Member has breached POR or any other Scout policy	The Malverns District Scout Council initiate The Scout Association involved if severity meets a policy threshold
Scout Member leaving	The updating of an individual's membership status post leaving the association.	The Malverns District Scout Council
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 The Malverns District Scout Council may access special category data for Census 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 The Malverns District Scout Council.

### **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 Malverns District Scout Council 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 The Malverns District Scout Council where we need 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 or Duke of Edinburgh awards) 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. This is covered by The Scout Associations Data Protection Policy (see above).

**Online Scout Manager** - is the online membership system of Online Youth Manager, this system is used for the collection and storage of youth member personal data. Online Scout Manager have their own Privacy Policy and you can find this at link: <https://www.onlinescoutmanager.co.uk/privacy.html>

**Use of Local District Systems** to hold and process data for local purposes including events, activities and communications. These will evolve and change over time, but will always been checked first to ensure that they offer adequate security and their use will be recorded by the District. Typically, they may include:

- Microsoft Office and Office 365 for things like permits, personal, medical and emergency details to provide information on the planning of scouting activities, safeguarding and security of members. This may include Microsoft SharePoint, Teams and OneDrive. For example, adult volunteers may hold some personal data on local spreadsheets or databases.
- Eventbrite for personal details when booking on to some events
- Doodle for personal contact details when attempting to organise events
- Dropbox and OneNote for programme data with names
- Customer/Client Relationship Management (CRM) systems for contact details to deploy relevant communications to member
- MailChimp and other bulk e-mailing systems for contact details to deploy relevant communications to member
- Hard copy / paper as appropriate, for example while attending events - used rather than relying on digital systems, as often the events are held where internet and digital access will not be available.

Paper is sometimes used to capture and retain some data for example:

- Gift Aid administration.
- Event registration and documentation, including travel documents.
- Health and contact records forms (for events).
- Events coordination with event organisers.

## 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 a new information or an updated Policy explaining this new use prior to 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

A link to this Data Protection Policy page is provided to those whose data is being processed by us, e.g. on our web pages and forms. A printed version is also available on request.

## 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](http://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 decision are being made about you based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by us.

## Websites

The Malverns District Scout Council avoids the use of cookies on its websites, especially for visitors. When logged on the websites for editing and administration, only the minimal WordPress cookies are used.

You may submit data (including personal data) through request, contact or comment forms on our websites in accordance with this Data Protection Policy.

## 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 email at [chair@scoutsmalvern.org.uk](mailto:chair@scoutsmalvern.org.uk).

This Data Protection Policy was agreed by the District Trustee Board at their meeting on the 15<sup>th</sup> April 2026 and directly follows the currently available guidance from The Scout Association.