

5th Blackpool Scout Group PRIVACY NOTICE



Produced by Laurence Orchard Tuesday, 19 February 2019



Upholding information rights

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Certificate

Organisation Name:

5th Blackpool Scout Group

Reference number:

ZA481311

Tier:

Tier 1

Start date:

19 December 2018

End date:

18 December 2019

Data Protection Officer

- Title: Mr Name: George Binns
- Address: 8 Kempton Avenue Blackpool FY3 9HS

Email address: datacontroller@5thblackpoolscouts.org Telephone number: 07852945045 Publish Name: Yes Publish Contact Details: Yes Name of Organisation: 5thBlackpool Scout Group

PRIVACY NOTICE FOR MEMBERS, VOLUNTEERS AND PARENTS GIVEN BY EXECUTIVE COMMITTEE

YOUR INFORMATION

Data Controller:

Name of Organisation:	5 th Blackpool Scout Group
Data Controller:	George Binns
Address of Controller :	8 Kempton Avenue, Blackpool FY3 9HS
Telephone Number:	07852 945045
Email address:	DataController@5thblackpoolscouts.org
Date: 19 th December 2018	

What this Notice is about

This Privacy Notice tells you what information we obtain and hold about you whether you are initially applying to us for membership or if you become a member, volunteer, executive committee member, trustee or parent of a member (herein after called a Member), it explains what information we collect, why we collect it, and what we do with it, as well as who we share it with. We collect and handle personal information about our existing or prospective Members to enable us to provide safe and secure ongoing activities within the Scout Group. This includes dealing with applications for membership or volunteering, checking the suitability of those applicants (including criminal, immigration and similar referencing checks), subscription collection, management of the property, dealing with any complaints, maintaining our accounts and records, membership terminations and administering activities and activity payments.

We call this information "your information". It is also referred to as "data".

Where this notice is given to more than one person it is given to each of you separately.

You should read this notice when you give us information so you are aware of how and why we are using this. Please update us if any information supplied by you changes.

Why we are giving you this notice

We are required by data protection law to give you this notice. We must be open with you about why information is collected about you and then what is done with it. We must act fairly in relation to this information. You have various legal rights relating to this information which is spelt out in more detail in this notice.

If you are already a Member some of the items in this notice may not be relevant to you. Different information will be involved depending on the type of Member you are; whether you are an ordinary member, executive committee member, trustee, volunteer, child member or parent of a child member.

In order that we can collect or use information about you there must be a legal basis or gateway for doing so. This notice identifies the relevant gateway for the various types of information we collect and hold about you. A detailed explanation of these gateways is given in this notice.

Under data protection legislation we can only process data "as necessary" and only to the extent that it is needed. For example, we can use your bank details regarding payments and other limited purposes only. However, in certain instances, as necessary, we can share any of your data, e.g. with our own professional advisers. We may also share any of your data, as necessary, with the police/law enforcement agencies or regulatory authorities. This "necessity" also changes dependent on the type of Member you are.

The data we collect/hold about you

We use different ways to collect data about you including the information you supply to us when applying to become a Member. If you fail to provide this information we may not be able to proceed.

As necessary personal data is processed by us or by any agent we retain relating to Members consisting of some or all of the following as applicable based on Member type: -

- Identity and contact details
- Personal/background information including occupation/status
- Bank details
- Verification and credit status
- Immigration/right to rent checks (England only)
- Audio and CCTV recordings (if any)
- Complaints
- Insurance
- Health or disability
- Emails texts and other communications and via our website where we operate one.
- Website and online portal information.

We also generate and use data internally, e.g. our subscription records.

We also collect and receive data about you from third parties. This may be information given to us by other Members. Public bodies such as local authorities or the police, or other law enforcement agencies may give us information about you. We can obtain information about you if we need to take up references. Any information which we receive in this way is set out in the Table to this privacy notice which gives you more details about information which we may receive from third parties.

Sharing data with others

We will share information we hold with others, where this is necessary; When we do this, we must comply with data protection legislation. Information can be shared with other groups and districts; for instance where you apply to transfer to a different group. Public and government bodies; courts; police and law enforcement agencies; taxation authorities; local authorities in relation to regulatory functions. We may need to share information with your next of kin etc., e.g. in an emergency. We also may share information with professional advisers such as lawyers and accountants or an advice agency which involves sharing information about you with them. In some cases, we may be under a legal obligation to provide information either because of the law or because of a contractual obligating binding on us. What we share will depend on what is necessary in the circumstances and more details are given in the Table in respect of different kinds of information which we hold about you.

Search engines, websites, etc

As necessary, we may obtain information about you which is publically available via search engines such as Google or Facebook and websites. This will include information about you which you yourself made public. Further details are set out in the Table. However, when doing so we make sure that we comply with applicable guidelines under data protection legislation.

Special categories of data/sensitive personal data

In limited situations we will process information about your health or any disability. This data is given special protection under data protection law. Normally we would expect to ask you for your explicit consent before we collect or use this kind of data.

Children

In cases where the Member is a child, information will be given to us about children; usually by an adult such as a parent on their behalf. Data protection law requires us to give such information additional protection where we collect or use it.

Obligation to process data

The Scout Association is highly regulated so we are under various legal obligations. These include an obligation to carry out DBS checks on members and persons having direct contact with children and persons having contact with any financial aspect. We may need to handle data for this purpose.

Similarly, there are various regulatory requirements which may mean that we need to give information about you to public or local authorities or other regulatory authorities.

Why we collect data and the legal basis for processing your personal data

We must tell you why we collect and hold information about you.

We must also have a legal basis before we are allowed to collect or process your personal data. Processing personal data includes recording, storing, altering, using, sharing or deleting data. We only need one of these "gateways" and for our purposes they are –

- You consent. Consent may be requested in certain cases, e.g. to obtain a reference but generally we do not rely on your consent to process your personal data.
- To perform our contracts so that we can carry out our responsibilities under the agreement with you, including anything you request us to do with a view to you becoming a Member.
- Compliance by us with a statutory or other legal obligation.
- Where this is in your vital interests, e.g. if there is a life-threatening situation.
- Where we are pursuing our own legitimate interests or those of a third party. This will not apply if our interests are overridden by your interests or your fundamental rights and freedoms. We must carry out a balancing exercise therefore to decide whether we can rely on this gateway to ensure that it applies. In each case we have done this and we do not consider your interests, rights or freedoms outweigh our own or those of the third party concerned.

This notice identifies the relevant gateway applicable in each case. In some cases, we will rely on more than one gateway depending on the particular purpose for which we are using your data.

Additionally, any data must be processed by us fairly and openly.

Why we process your data

The various purposes for which it may be necessary for us to process various categories of your information, these being dependent on the type of Member, include: -

- In our legitimate interests for deciding on the suitability of a proposed Member.
- In our legitimate interests for verifying the credit worthiness/suitability of a Member.
- In our legitimate interests to secure subscription and other required payments.
- For contractual performance for subscription collection and collection of other payments including banking details
- For contractual performance for managing the scout group and the property
- For contractual performance and/or in our legitimate interests for record keeping
- For contractual performance for arranging repairs and maintaining the condition of the property and keeping it in a safe condition.
- For contractual performance for monitoring and enforcement of Member responsibilities
- For contractual performance or in our legitimate interests for recovering debts and other payments due.
- In our legitimate interests for processing complaints
- For contractual performance or in our legitimate interests for dealing with health and disability issues relating to Members
- In our legitimate interests for obtaining and holding audio and cctv recordings
- To perform our legal obligations to provide information to public or local authorities who are legally entitled to require this information
- In your vital interests for contacting next of kin etc., in an emergency
- In our legitimate interests for the storage of emails, records of calls and other communications
- In accordance with our legal obligations if you exercise your rights under data protection law
- To perform our legal obligations for compliance with legal and regulatory requirements
- In our legitimate interests for the establishment and defence of legal rights
- In our legitimate interests for prevention, detection and investigation of crime and anti social behaviour and the security of any website or other means of electronic communication

We may change the purposes where this is compatible for the purpose for which we obtained the data originally. If we need to use your data for a non-compatible purpose we will notify you and explain the legal gateway that allows us to do so. We may process your information without your knowledge where this is required or permitted by law.

More information about what we do with data and why, along with the relevant legal gateway is given in the Table. This also tells you who we share data with and who we receive it from.

Retaining Communications

We will monitor, record and retain your calls, emails, text messages, social media messages and other communications if necessary. This is in our legitimate interests to maintain an accurate record of these. This may be necessary to manage the scout group or the property or to deal with your application to become a Member. We need these records for our ongoing dealings with you, including our data protection obligations.

Length of storage of data

Data can only be stored on a time limited basis and not indefinitely. We will hold personal data about you whilst you are a Member and for seven years after this has ended. This is the statutory limitation period six years plus a further year to allow for service of proceedings should proceedings commence later. We are also required to retain information for up to six years for tax purposes. If your application does not go ahead then we retain data for one year.

Storage and security of data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

All our information is stored securely electronically on servers or devices. Certain information is also retained on a secure basis in hard copy format.

Telephone calls

To protect our legitimate interests telephone conversations may be recorded electronically for monitoring and to ensure that we have a record of what is said. You or others may leave messages when calling.

<u>CCTV</u>

When we install CCTV, this is for security purposes in cases where we consider that it is in our legitimate interests to carry out such monitoring which must be done in accordance with legal requirements. We may also use CCTV in the common parts or outside the building. Recordings will be kept for these purposes.

Your rights

Where we hold personal data about you, you are the Member. Data protection legislation gives you a number of rights. To exercise any of these rights you should contact us. You can do so by email at the address given above or you can telephone us on the number given above. You can also write to us at our address given at the top of this notice. Normally no fee is payable.

In particular you have a right to object to the processing of your information where we are processing this in our own legitimate interests or those of someone else. This applies if you feel that this impacts on your own interests or your fundamental rights or freedoms.

These rights are as follows -

- Access you have the right to make a request to be told what personal data we hold about you.
 This is a right to obtain confirmation that data has been processed and to have access to your personal data and the right to information details which should be provided with the privacy notice.
- Correction/Rectification if you consider any data we hold about you is inaccurate you can tell us so
 that where appropriate this can be corrected. Where a mistake is made in data processing then you
 can ask to have it rectified. Any third parties who have received the data from us should then be
 told of the rectification and you should be informed by us of any such third parties.
- Erasure you have a right to ask us in certain circumstances to erase any data we hold about you (the so called right to be forgotten). Individuals can request the right to have personal data erased to prevent processing in specific circumstances, i.e. it is no longer necessary, consent has been withdrawn, there is an objection and where applicable your rights etc., override the legitimate interests to continue our processing, or data has been unlawfully processed.
- You can object to our processing of data this allows you to object to our processing of data about you. We must then stop processing data unless we can establish legitimate reason for continuing. In particular this applies where we are relying on our own legitimate interests or those of a third party to process data but it can also apply in other situations.
- Restricting processing you can ask us to suspend processing of your personal data and we must then restrict processing of data. This includes where you are contesting the accuracy of a statement or the lawfulness of the processing.
- Data portability this allows individuals to reuse their personal data for their own purposes across different services allowing them to move, copy or transfer personal data more easily.

It should be noted that withdrawal of these right may mean it is not possible to continue as a Member.

Withdrawal of consent

Where your consent provides us with the legal gateway to process data about you, you can withdraw this at any time by telling us by email or post using the addresses given above.

Complaints

We operate our own internal complaints policy and if you have any concerns about the way in which we collect or handle data please contact us.

Additionally, you have the right to lodge a complaint with the Supervisory Authority who is -

Information Commissioner Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF www.ico.org.uk

Introduction

About this Table

As necessary, we collect, use and otherwise process different categories of information (data) about you relying on the various legal gateways available to us. This relates to your application to become a Member and, if this goes ahead, so that we can manage the membership and the property along with associated matters. This part of the notice gives you a <u>general</u> description of these processing activities for the different categories of information and the purposes for which we process your information. If you consider that we have not given sufficient details of what we do then you can make an access request for more information.

Background

Running a Scout Group and managing its property is a multi-faceted activity. As children, their safety and activities are at the centre of this service, we must process your data for a large number of different purposes. Data protection law requires us to give you information about these processing activities as concisely as possible. To do so we have split information about you into different categories, this is in line with requirements in the legislation. We also have to tell you the extent for which your information can be used and shared. Due to the nature of our business information falling into one category will be combined with information in other categories to be handled by us as permitted for the stated purposes under the relevant legal gateway which we have to identify. For example, information about your identity/contact details will be combined with other categories of information to correctly identify you, e.g. when we compile our accounts or pass information about you or an activity over to someone else so that they can deal with you. However, we only do this to the extent that it is necessary in the circumstances.

Expressions used

To make this Table as concise as possible we employ a number of expressions -

Handle information – collecting, compiling, using or storing information (data).

Use information – when we use information this means we consult it, compile it, refer to it to make a decision, or act on it, or combine it with other data. When using it in this way we may have to alter it.

Share data – this includes transferring data to someone else where this is necessary, or receive it from a third party.

Collect data – this is where we receive information either from you, e.g. when you sign an application form or from a third party, e.g. a reference about you.

Compile data – this is where we use information about you which we have collected to generate information about you, e.g. our payment records or activity records.

Next of kin etc. - this includes close relatives.

Altering Data

We are required by data protection legislation to keep your information up to date and it is of course in our own legitimate interests to do so for us to ensure that we have accurate records. For example, we keep our record of your subscription payments up to date as they are received.

Storing Data

We keep information both electronically and in a manual filing system to maintain our records. We do this because we need to use it from time to time. Normally the legal gateway permitting us to do so which will apply will be the same as applies when we use the data. Additionally, however, there are legal obligations to retain data under data protection law, taxation legislation and other laws. We also need to do so to fulfil our contract with you. In our own legitimate interests, we also need to retain information to deal with enquiries or disputes and for audit purposes.

Destruction of Data

We delete/destroy data once it is no longer needed. This is a requirement of data protection law. This notice tells you the period for which we normally store data.

What this Table tells you

Information is handled as necessary from time to time. As already stated, information falling under one category can be amalgamated with or added to information in another category in order to carry out the stated purposes.

Part 1 of this Table tells you, depending on the relevant category of your information, what our processing activities are and what is the legal gateway permitting processing as well as the purpose for which we carry out these processing activities.

Where the legal gateway in question is our own legitimate interests (or those of a third party) we identify the relevant legitimate interests.

Details about sharing data are set out in Part 2, whether we transfer it to someone else or receive from a third party.

Part 1 – Collecting, compiling, using and storing your information

In this Part we list out the different categories of your information, briefly explain them where needed, explain what we do with the information and why, as well as specifying the relevant legal gateway we rely on to do so.

We use the word "handle" to cover collecting, compiling, using or storing this information.

Identity and contact details

- 1. This includes name, contact details, date of birth and other identifying information. e.g passport, driving licence
- 2. We handle this information in order to enter into the agreement of membership and subsequently to manage it. This is done to perform the contract.

- This includes details of the your present residence, current occupation and status, employed, student etc., employer or educational institution, any bankruptcy or county court judgments, next of kin etc.,.
- 2. This information is handled to evaluate your suitability as a Member. This is done for our own legitimate interests. These are to ensure that any Member is a reliable and trustworthy person.
- 3. We also handle this information which relates to next of kin etc., to contact them in the event of an emergency. This is to protect your vital interests.
- 4. This information will also be handled if we need to trace you to contact you in connection with the membership or the property. This is in our own legitimate interests.

Bank details

- 1. This includes details of your bank, building society or other paying organisation, including those operating digitally/online.
- 2. We handle this information in order to receive payments from you or on occasion to make payments to you. This is done to perform our contract.
- 3. We also handle this information as part of our verification of your suitability as a Member, including to protect against money laundering. This is in our own legitimate interests to ensure that we enrol suitable Members and do not receive proceeds of crime.

Membership details

- 1. Memberships are renewed by agreement. This will involve a request from you. We handle information about the renewal of memberships. e.g. a move from Beavers to Cubs etc. This is done for contractual performance.
- 2. We handle this information to protect our own legitimate interests. This is to provide security for the payment of the subscriptions and to ensure compliance with membership obligations.

Subscription and payment collection

- 1. This includes records we compile to record receipt of subscriptions and other payments from you and associated documentation relating to such payments. This also includes any documentation where we need to issue reminders for payment, including levying charges for interest or fees for late payment.
- 2. We keep this information in order to compile correct and up to date records. This is done for contract performance.

Recovery of arrears, claims and other proceedings

- In the event of non-payment of subscriptions or other payments due, or if there is non-performance of the contract (including allegations against ourselves) then we record this and enter into relevant communications. This includes information and documentation related to any proceedings which may be commenced or brought against us in relation to these matters.
- 2. We handle this information in order to pursue recovery of what is owing to us and to enforce our rights, to defend claims, and to recover possession of any property. This is done in our own legitimate interests. These are to protect our property interests, to enforce our rights and to ensure payment due to us is made, as well as to defend any claims brought against us.

Breach of membership agreement/nuisance etc.

- This includes complaints which we receive or information which we hold relating to alleged breaches by a Member (which could include a child) including nuisance and anti social behaviour. This includes records and related communications. This includes complaints about these matters made by neighbours, other Members or the general public.
- 2. We handle this information so as to ensure that obligations are complied with and that Members live harmoniously with neighbours and others. This is to protect our own legitimate interests and the legitimate interests of affected third parties. These legitimate interests are ensuring the obligations are complied with as well as the prevention and detection of crime and anti-social behaviour.

Membership termination

- 1. A membership may run out and the Member leaves. We may serve notice requiring the Member to leave and, if need be, enforce this.
- 2. Membership terminations of whatever kind also involve the return of any monies paid for future activities, possible claims against Members, claims on personal insurance or property insurance, arrangements for Members to return property, Members property being left behind. They also give rise to issues around the state and condition in which the property has been left or returned, e.g. cleanliness.
- 3. We handle information relevant to these matters concerning membership termination. This is done in our own legitimate interests. These are to ensure that any property is returned to us in a proper state and that all appropriate financial claims by either party against the other are correctly dealt with. These include our obligations in relation to the refund of any monies paid for future activities to comply with our contractual obligations between us.

Complaints

- 1. We operate a complaints procedure which may be informal. Although we will do all we can unfortunately sometimes things go wrong so complaints may arise.
- 2. Information handled concerning complaints which you may make or which may be made on your behalf. These will give rise to communications and records being compiled by us.
- 3. We handle complaints with a view to resolving these, although this might involve external intervention, e.g. by the Scout District, Scout Association and/or the courts.
- We handle complaints for contract performance. This is also done in our own legitimate interests. These are to protect ourselves against claims and to ensure that the complaints are properly resolved.

Health/disability

- 1. Importantly, this is sensitive personal information to which additional protections apply. We may be given information about your health (whether mental or physical) or disabilities.
- 2. Health information may be given to us to explain your absence from the group or as a reason why subscriptions have not been paid. You may wish us to have information about your health so that we are aware of how you may need assistance on occasion. This could also be information about health or disabilities affecting someone else which impacts on you.
- 3. We may be given information about your disabilities so that we can make particular arrangements for you, including any adaptations which may be required to make under disability discrimination legislation.
- 4. We handle information about your health or disability, and the health of others depending upon the circumstances to assist us in the management of the group and the property. This may be to protect your vital interests. It may alternatively be for contractual performance where it affects your ability to perform your obligations under the agreement. It will be in our own legitimate interests if we are told of any medical condition which affects you. This is so we are aware of possible impacts on you.
- 5. In regards to information concerning any disability, we handle this information to assist in the management of the group and the property. This may also be under a legal obligation where we are obliged by law to make provision to deal with your disability.
- 6. In addition, as this is special category data, additional legal requirements are imposed upon us about your health and/or disability and we may request your consent to handle this information.

CCTV and Audio

- 1. If we operate CCTV you will be given information about this. We may operate CCTV to cover common parts, the exterior of the premises or camp sites.
- 2. We may also hold audio recordings, e.g. messages from you on telephone answering machine or mobile phone.
- 3. Where CCTV is operated this is for the safety and security of the premises in question and for the prevention and detection of crime and anti social behaviour, as well as monitoring membership obligations. This is done in our own legitimate interests. These include the protection of our property and ensuring compliance with obligations as well as the safety and security of Members, children and neighbours.
- 4. We handle audio recordings to assist with accurate record keeping. This is done for contract performance or in our own legitimate interests. These are to ensure that we have reliable records of communications.

Correspondence etc

- 1. Correspondence includes all ways in which we receive communications from whatever source. This includes emails, text messages, social messaging and messages, letters and documentation. This can include photographs and other visual recordings.
- 2. We handle these communications initially relating to entering into a Member agreement and then for the management of the group and the property, as well as associated matters arising under the various categories of information referred to in this Table. This is done for contractual performance where applicable, to carry out any applicable legal obligations imposed on us, to protect your vital interests, or in our legitimate interests. These legitimate interests are to ensure that we have the necessary information relating to these matters and for accurate record keeping.

Websites and online platforms

- 1. Information about you is available in the public domain, often put there by you. This can be accessed by appropriate searches which allow for access to the websites which hold this information.
- 2. Information about you is also made available when you access online platforms.
- 3. We may handle this information to assess your suitability for membership and for the management of the group and the property. This is in our own legitimate interests to ensure that Members are suitable and that the group and the property are effectively managed. This can include ensuring that obligations are performed. These legitimate interests are to ensure that our property interests are protected and our rights are enforced.
- 4. We handle information received via our online platforms for contract performance, including arranging activities and entering into agreements.

Insurance

- 1. We insure the buildings and may insure contents belonging to us. We may also insure against public liability, including liability to you for injuries and membership insurance.
- 2. We handle information about you which may be relevant to our insurances to arrange cover, to administer insurance contracts, to renew insurances and to make claims. Contractually we are under certain duties, e.g. to disclose information to the insurers. We handle this information to protect our legitimate interests. These are to ensure that appropriate risks are adequately insured against and to recover any sums due to us under the policy as a result of claims.
- 3. It is your responsibility to insure your own contents/belongings. You may seek information from us relevant to arranging such insurance or making claims. We handle this information and will do so with your consent which is provided as part of your request for any assistance or information.

Car registration

- 1. We hold records of car registrations for vehicles which you keep at or in the vicinity of the property.
- 2. We handle this information to manage the property for contract performance.
- 3. We also handle this information in our own legitimate interests and those of others such as neighbours in order to monitor and regulate parking. This is to protect our own property interests and rights and those of others such as neighbours who may be affected by parking issues.

Part 2 – Sharing Information

Introduction

We share your information with various persons, organisations and public authorities as necessary. This involves us either transferring your information to others or collecting it from them, depending upon the circumstances. This Part of the Table gives you details about this. It can be a two-way traffic between us and others. In some instances, we may collect information about you from someone else following a request by us to them to provide this information.

Where we collect information from others (third parties) we have to tell you the source of this information, whether or not it is publically accessible, the nature of the source (i.e. whether it is publically or privately held) and the types of organisation from whom the information is obtained. Where possible we need to name the source as well but often this cannot be done. The required details appear in this Part of the Table.

Where information is received from a private person/body or a public authority, this information will not normally be publicly accessible, however in some instances it will be. Information which will be publically accessible will be information available in public registers, e.g. registers of births and other available public registers.

We share identity and contact details with all persons, organisations/authorities referred to below. This category of information is linked with the other information in every category for the purposes and under the legal gateway specified under each of the other categories of information. This is to ensure that you are correctly identified and, if need be, can be contacted.

A - Sharing of certain categories of your information

We share certain categories of your information (both transferring it to them and collecting it from them as necessary) with private persons/organisations and public authorities as necessary.

In Section B we go onto explain that, as necessary, certain private persons/organisations and public authorities can share any of your information (irrespective of its category).

Table 1 below identifies the different categories of your information and specifies the private persons/organisations/public authorities with whom these different categories of your information are shared as necessary. This Table should be read in conjunction with Table 2 (private persons/organisations) and Table 3 (public authorities). Tables 2 and 3 explain why we share your information with these persons/organisations/public authorities and the legal gateway which allows this to happen.

Depending on the category of data concerned you should also refer to that category under Part 1 above because the purposes set out for which we handle data and the legal gateway for doing so also usually apply when we share data with others.

Table 1 – Data categories and who they are shared with

Data category	With whom we share the data
Personal/background information	Other scout groups/sections/campsites; next of kin etc.; insurers;
	banks, DBS etc.
Bank details	Our bank, credit reference agency; DBS, taxation authority
Membership details	Other scout groups/sections/campsites, taxation authority
Subscriptions and other payments	Bank, taxation authority, insurers, other scout groups / sections /
	campsites
Recovery of arrears, claims and	taxation authority; insurers; Other scout groups/sections/campsites;
complaints	courts
Breach agreement/nuisance etc.	educational institution, neighbours, other residents etc., insurers
Termination of membership	Other scout groups/sections/campsites, educational institutions
	taxation authority, bank, etc.
CCTV/audio/ recording table	next of kin etc.
Correspondence etc.	Depending upon the applicable category of information relevant
	correspondence etc. is shared with any of the
	persons/organisations/authorities listed in Section A.
Online platforms	
Insurance	Insurers, banks etc.

Table 2 – Private persons/organisations

Categories of persons	Purpose and legal gateway
/organisations	
Other scout groups / sections /	To obtain references. This is to ensure suitability for a Member in
campsites	our own legitimate interests. These interests are to ensure that
	Members are reliable suitable people. We also provide information
	to these persons/organisations to assist in the moving of Members
	to different groups/sections or to enable the Members participation in
	activities.
Contractors / tradespeople /	Assisting in carrying out our responsibilities under the membership
service suppliers	and for the management of the group and the property for
	contractual performance. In certain cases, this is also to comply
	with our legal obligations in relation to health and safety, e.g. gas,
	electrical and fire alarm maintenance and inspection. On occasion
	we will arrange for inspections in our legitimate interests. This is so
	that we can deal with complaints and pursue/defend claims.
Utility companies and service	Arranging for utilities/services and establishing liability for payment
providers, e.g. Broadband	along with administering their supply in our own legitimate interests
	and those of the provider. This is to ensure utilities/services are
	provided and that liability is correctly established. Utility companies
	also have certain statutory obligations to perform, e.g. metering
	Otherwise, they are in the legitimate interests of the utilities/service
	providers to ensure that they can effectively carry out their various
	activities.
Credit reference agencies	We request and consider credit and other referencing relating to
	deciding on the suitability of applicant for membership as a Member.
	This is in our own legitimate interest to ensure that we enrol reliable
	Members
Debt collects/tracing agents	To trace you or make a claim in our legitimate interests. These are
	to enforce our legal rights.
Next of kin etc.	To make contact with them in the event of an emergency to protect
	your vital interests.
Insurers	To arrange public and other liability insurance and membership
	insurance and to make claims. This is in our legitimate interests and
	the insurers' legitimate interests. These are making sure that
	appropriate insurance is arranged and the policies are correctly
	administered. Under the terms of policies, we are required
	contractually to provide information to insurers.
Banks and lenders	Where we have loans, information regarding membership may be

	provided to arrange and administer loans. This is in our own
	legitimate interests to finance our activities. Contractually they are
	not entitled to your information; this would be in the form of
	numerical data. In the case of banks information about you can be
	shared for the purposes of administering subscription and other
	payments for contractual performance. Your information can also be
	shared for the purposes of preventing and detecting money
	laundering and fraud. This is in our own legitimate interests and
	those of the bank in order to detect crime. Contractually we may be
	required to provide information regarding insurance cover to banks
	etc. providing us with loans. This is in our legitimate interests to
	ensure compliance with the loan conditions and in the interests of
	the bank etc. to see that appropriate insurance cover is in place.
Neighbours, other tenants and	The management of the group and the property. This includes
residents	information relating to complaints including alleged breaches of the
	membership agreement and anti social behaviour, as well as
	damage to the property. It can include car registration information.
	This is in our own legitimate interests to protect our property rights
	and to enforce compliance with the terms of the membership. It is
	also in the legitimate interests of neighbours for their enjoyment of
	their own properties and to protect their property, interests and
	rights.
Web sites, portals etc.	Undertaking searches and obtaining publically available information
	relevant to your suitability as a Member and relating to the
	management of the group and the property. This is undertaken in
	accordance with applicable data protection law and guidance and
	subject to data protection principles. In connection with your
	application for a membership, we may receive information via any
	online portal involved for contractual performance.

Table 3 – Public Authorities

Educational institutions	Information relating to breach of membership terms, nuisance or anti
	social behaviour may be shared with educational institutions where
	you are studying. Educational institutions can operate complaints
	schemes in conjunction with others. This can include information
	about membership terminations. This is in our own legitimate
	interests to protect our property interests and our rights and in the
	interests of the educational institution concerned to oversee the
	conduct of their students.
Taxation authorities	These are HM Revenue and Customs and local authorities, as well
	as any other public authority having power to levy taxes or charges.
	We are required by law to make appropriate returns to comply with
	legislation imposing taxes etc. In the case of Council Tax this is
	required where statutory notice to that effect is served on us.
	Otherwise, we share information with the local authority relating to
	Council Tax in our own legitimate interests to ensure that Council
	Tax is correctly administered and in the legitimate interests of the
	local authority to collect information for the same reason. Your
	information could also be shared with HM Revenue and Customs in
	the processing and claims for Gift Aid.
	1

B - Private persons/organisations/public authorities with whom any information is shared

As necessary, we share all of your information (irrespective of its category) with certain private bodies/organisations/public authorities. This includes transferring your information to them and receiving it from them. These are

Category of	Purposes and legal gateway
person/organisation/public	
authority	
Professional advisers	Assistance and advice regarding the management of the group and
	the property for contractual performance. Where we handle your
	information under some other gateway and a professional adviser
	assists or advises this will for the same purpose and under the
	same legal gateway. If it is in the legitimate interests of ourselves or
	someone else then those interests will be the same. These are to
	ensure that we act appropriately and properly as well as according
	to the law.
Police/law enforcement agencies*	Prevention/detection of crime and anti social behaviour in our and
	their legitimate interests. This is to protect our property and enforce
	our rights and to enforce the law.
Regulatory authorities*	To carry out their functions in their legitimate interests. These are to
	enforce legal requirements. On occasion, we may be under a legal
	obligation to provide your information, particularly if a notice to that
	effect is served on us. This can include an ombudsman or
	accreditation or similar scheme of which we are a member. It also
	includes water companies, utility providers who are exercising their
	functions as statutory undertakers.
Courts*	The administration of Justice in our legitimate interests. These are
	to pursue and defend claims.

* These are public authorities

Names of persons/organisations/public authorities with whom information is shared

Where we are able we have to provide you with the identity of the persons/organisations/authorities which are referred to in Tables 1, 2 and 3 above.

Email provider: TSOHosts.com Paragon Internet Ltd
Website provider/host (if any): TSOHosts.com Paragon Internet Ltd
Accountant: Gavin Hathaway
Group's bank:
Group's insurance:
Building insurance: Vehicle insurance:
public liability:
Other professionals:
Local authority for the group property:
Blackpool Borough Council
Water Company:
United Utilities
Service providers (e.g. Broadband, membership services):