

# The Girls' Brigade in Scotland

## GDPR PRIVACY NOTICE

The Girls' Brigade in Scotland is committed to ensuring any personal data is processed in accordance with the new GDPR legislation introduced on 25 May 2018. In whatever capacity you are involved with Girls' Brigade Scotland you will have provided some form of personal data and this privacy notice explains how we collect, process and store this. This notice aims to be as comprehensive as possible but if you have any questions please do not hesitate to contact the Data Protection Coordinator via [datacompliance@girls-brigade-scotland.org.uk](mailto:datacompliance@girls-brigade-scotland.org.uk) or by phone on 0141 332 1765.

### Definition of Personal Data

Personal data is defined as being data about a living individual which is used to identify the individual or data and other information which is in the possession of or is likely to come into the possession of the data controller (GBS) and could be used to identify the individual. Information about Girls' Brigade companies is not personal data.

### The type of information we may collect

- Name of member, Leader, Parent or Guardian
- Contact details, including address, telephone number and email address
- Date of birth
- Payment information (bank or credit card details) if you donate to us or buy from our the GBS online shop
- Records of your correspondence with us
- Records of your participation with us (including as a member or as a volunteer)
- Donation history and Gift Aid details
- Information you enter on our website
- Photographs, video or audio recordings
- Biographical information
- Any other information you share with us

In some circumstances we may also collect sensitive personal data about things like a person's racial or ethnic origin, their religious beliefs, their physical or mental health, their sexual life or if they have a criminal record. We normally only record this data where we have your consent. But sometimes we are permitted to do this in other circumstances, under data protection law. For more information visit the Information Commissioner's website - <http://ICO.org.uk>

## Why we collect and process your data

The data we collect and process is used in a variety of ways, including:

- Recruitment and retention of volunteer Leaders
- Training of members and volunteer Leaders
- Administration, including record keeping, attendance registers, etc.
- To manage Girls' Brigade activities at local and national level to ensure the correct and appropriate arrangements are in place for activities
- Health and safety which can include risk assessment, reporting of accidents, etc. which may include notifying GBS Insurers
- Updating Leaders on policies and procedures
- Communicating with Leaders via the GBS web-mailing service to provide updates, newsletters and other appropriate information
- Processing donations and claiming Gift Aid
- Investigating and responding to complaints, legal claims or other issues
- Processing online order for goods or services, including processing payment, delivery arrangements, etc.
- Marketing campaigns, such as membership recruitment or a campaign to promote items in the GBS online shop

Girls' Brigade Scotland will process personal data for the purpose for which consent is given. We aim not to collect information from you unless it is absolutely necessary and will do our best to keep such data up to date and accurate. To do this we need your help so if any of your contact details change please advise GB Headquarters so we can update our records. We will also take all reasonable measures to keep personal data safe and secure.

## Sharing data

Girls' Brigade Scotland will not share or sell personal information to third-party organisations for marketing, fundraising or campaigning purposes.

Girls' Brigade Scotland may share personal information with Divisional Commissioners in respect of an individual Leader's membership of the organisation to assist in managing and supporting the Leader in carrying out their duties and/or assisting them in wider participation within the organisation.

Girls' Brigade Scotland may also share personal information:

- Where we are required to by law, for example to law enforcement or regulatory bodies in respect of Safeguarding

- With data processors working on our behalf. For example, if you buy an item in the GBS online shop it is a third party which processes payments
- Where it is necessary to protect the vital interests of an individual
- If we have your consent, we may use third-party suppliers to manage events, campaigns or mailings for fundraising appeals or to carry out research surveys. Girls' Brigade Scotland will always seek specific consent to share this information before doing so. If you provide consent please note that these companies will only use the data in accordance with data protection legislation, under strict instructions from Girls' Brigade Scotland and in accordance with a data processing agreement.

### Any questions?

The Data Processing Table, pages 4 - 7, provides an easy reference guide about the personal information held by Girls' Brigade Scotland at local and national level.

If you have any questions about the information contained in this notice about how we handle personal you should contact the Data Protection Coordinator via:

The Girls' Brigade in Scotland  
11A Woodside Crescent  
Glasgow  
G3 7UL

Telephone: 0141 332 1765

Email: [datacompliance@girls-brigade-scotland.org.uk](mailto:datacompliance@girls-brigade-scotland.org.uk)

## Data Processing Table

Process	Description of Process	Data Processed	Lawful Basis	Reason to process	Retention of data
<i>Process to gather data</i>	<i>Full description of process</i>	<i>Examples of data collected for process</i>	<i>Lawful basis for processing data</i>	<i>Demonstrates justification for collection + retention of data</i>	<i>How long data is kept and why it is retained</i>
<b>Annual Enrolment/Consent Form (including general photo consent)</b>	Personal details of girl are provided by Parent/Guardian + Photo consent.	Name, address, telephone numbers, email address, emergency contact + essential health/medical information.	Legitimate interest and consent (in respect of photographs)	Leaders require access to current contact and health/medical details for girls in their care and to know about photographic permissions.	These forms should be retained securely for the full GB session and no more than 12 months until a new form is completed and then destroyed securely. If a girl leaves the Company the form should be destroyed at that time.
<b>Consent Forms for special activities (e.g. a day trip to Alton Towers or an overnight at the Science Centre)</b>	Personal details are updated by Parent/Guardian as the girl is participating in a special event or activity.	Name, address, telephone numbers, email address, emergency contact + essential health/medical information.	Legitimate interest	Leaders require specific permission from parent/guardian for the girl to take part in an activity and must have up to date medical information.	Retain completed forms securely for 6 months after activity has taken place, then destroyed. If safeguarding or accident issues arise GB HQ should be informed and forms sent to them.
<b>Parent/Guardian Holiday or Residential Experience Consent Form (this will give details of activities in which girls will participate during the holiday)</b>	Personal details of girl are provided by Parent/Guardian and specific consent given for girl to attend a holiday or residential experience which is insured by Girls' Brigade Scotland.	Name, address, telephone numbers, email address, emergency contact, up to date health/medical information. Specific permission is sought in respect of swimming abilities.	Legitimate interest	Leaders require specific permission from parent/guardian for the girl to take part in a holiday or residential experience and must have up to date medical information + about swimming activities/abilities.	Retain completed forms securely for 6 months after holiday has taken place, then destroyed. If safeguarding or accident issues arise GB HQ should be informed and forms sent to them.

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<b>External Event/Activity Consent Forum</b>	A form required by an external activity or event provider which must be completed by a girl's Parent/Guardian .	Name, address, telephone numbers, email address and health/medical information.	Legitimate interest	External event/activity providers may require their own consent or health form to be completed by a girl's Parent/Guardian in order to allow them to participate in the activity.	The activity/event provider should retain the form for the duration of the event and this should then be destroyed.
<b>Roll book/register</b>	This records the attendance of a girl at all GB meetings and activities. A record should also be kept of all adult Leaders in attendance.	Name and DOB	Legitimate interest	Leaders are required to keep an attendance record of girls and adult Leaders at all meetings and activities.	These should be retained securely but indefinitely, even after the girl or Leader has left the organisation.
<b>Company Newsletters, paper and electronic</b>	Used to inform Parent/Guardian and members of Company news and activities.	Name, Address, Email address	Legitimate interest	Used to keep Parents/Guardians and members up to date about news and information at Company level and also to share opportunities from other sources.	This data should be kept while the girl is a member of the organisation. When they leave this should be destroyed securely.
<b>Donation Forms</b> (this includes Gift Aid forms)	Used to record donations received by the Company or individual members, donors and supporters.	Name, address and bank payment details	Legal obligation	Companies often benefit from donations from supporters of Girls' Brigade. Parents/Guardians may use Gift Aid to pay membership fees. Details are kept to allow donations to be processed and to thank and update donors of how their funds have been applied.	Records are retained on the basis that the legal requirement to keep financial records is 7 years (after the last donation has been received). Thereafter, details should be destroyed securely.

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<b>Trainee Leader Registration Form – Induction, Bronze, Silver and Gold</b>  <b>Note: Read in conjunction with RM1</b>	Adults who wish to volunteer with GBS complete this form to register their interest in undertaking training at the appropriate level.	Name, address, telephone numbers, email address plus details of name badge order	Legitimate interest	GB HQ requires personal data to begin the training process while awaiting completion of PVG and RM1 form	Forms retained indefinitely by GB HQ to ensure training records are maintained
<b>Registration &amp; Membership Forms (RM1)</b>	Form completed by volunteers who have undertaken Induction Training	Name, address, telephone numbers, email address, plus confirmation of PVG safeguarding process and declarations from Church and Division	Legitimate interest	GB HQ requires personal data for administration and communication purposes and also to ensure safe recruitment and Induction Training has taken place	Forms will be retained securely and indefinitely by GB HQ for administration, training and safeguarding purposes
<b>Annual Return Forms (AR1)</b>	Personal details of all Leaders are part of the annual return form which collects membership numbers in October each year. Every Leader should update personal data (if they haven't done so previously) and sign to say they have read and understood GBS Policies and Procedures	Name, address, telephone numbers, email address, rank, etc. are printed on the AR1 to allow Leaders to check and amend data as necessary	Legitimate interest	GB HQ requires to check and update data on an annual basis for administration and record keeping purposes	Annual Return forms will be retained securely and indefinitely by GB HQ for administration and safeguarding purposes
<b>Notification of claims to Insurers</b>	If the criteria for notifying insurers of a particular incident or situation are met the details will be passed to the Insurer	Name, DOB, Address, Telephone numbers, email address, details of situation, e.g. accident, medical treatment	Legitimate interest	GB HQ has a requirement to provide details of incidents, situations, etc. which meet the Insurers criteria	Notifications to insurers are retained indefinitely by GB HQ

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<b>Associate Members Application Form</b>	Individuals who wish to become an Associate Member of the organisation must complete this form	Name, address, telephone numbers, email address	Contract	Compliance with financial procedures and for communication purposes	The forms will be retained by GB HQ for 12 months after the last subscription fee has been paid. The form will be destroyed securely thereafter.
<b>GB Supplies Orders</b>	The purchase of goods through online orders	Name, address, telephone numbers, email address and payment details	Contract	To process and deliver goods ordered	Retained for 7 years based on financial requirements
<b>Staff Personnel Records</b>	Data held as part of recruitment process and in respect of the individual employee's personal development records	Name, Address, telephone numbers, period of service, health conditions, sickness records, maternity pay records, disclosure checks (if applicable to role).  Details of next of kin, bank account (for salaries to be paid, references, details of experience, qualifications, training, probationary, appraisal and disciplinary information.	Contract	As the employer, GBS is required to keep information relating to all members of staff who are employed by us.	Records will be retained for 6 years after employment has ceased.  Any records relating to unsuccessful applicants will be retained for 3 months following notification to candidates and then destroyed securely.