

GDPR Policy and Procedure

Policy Purpose

1. This policy is a formal acknowledgment that GDPR (General Data Protection Regulation) within the County is the responsibility of the County Trustees (County Executive Committee).
2. The Executive Committee is committed to maintaining data in accordance with the Scout Association GDPR Policy. The aim is to ensure that Northamptonshire Scouts effectively manages all personal data regardless of the medium.
3. This policy and procedure encompass data held at County level including the Sir John Lowther Centre.

Policies that should also be referred to

4. Scout Association Data Protection Policy
5. Scout Association Data Retention Policy

Procedure to be taken in the event of a potential or actual data security breach

6. The procedure detailed in Annex 1 should be followed for all actual or potential breaches of the GDPR.

Trustee Responsibility

7. To have undertaken the Scout Association GDPR mandatory training.
8. To be aware the County Data Protection Officer is the County Secretary
9. To report any suspected breaches of GDPR using the following procedure.

Amendment History

Date	Detail
23/02/2023	Initial draft
06/03/2023	Second draft, minor amendments
13/04/2023	Approved by County Executive

Suspected Data Protection Breach Procedure

This procedure is limited to the steps required to record a suspected breach of the GDPR.

First Steps – by the individual reporting the breach

1. If a potential breach of the GDPR is suspected, complete the County reporting form, <https://northantsscouts.org.uk/data-protection-breach-recording/> (or the paper version at Annex 2).
2. If the potential breach involves paper records:
 - a) Photo the paper in situ (not a close-up) to give context to where it was found and the potential risks.
 - b) Post the paper to the County Data Protection Officer.

Subsequent Actions – by the County Data Protection Officer

3. The County Data Protection Officer may get in contact to gain more information.
4. The County Data Protection Officer will convene the County's Data Protection Group and follow the Scout Association's Step 12: Responding to a Breach
5. Once the breach has been investigated and classified, it will be brought to the attention of the full County Executive.

Suspected Data Protection Breach Report

Please complete this form and forward it to the County Data Protection Officer, (County Secretary),
Lowther Adventure, Rushton Road, Glendon, Kettering, Northamptonshire NN14 1QF

Name of person reporting	
Email	
Phone Number (optional)	
Date breach first noticed	
Date and time of incident (if known)	
Data Breach type	• Paper Records • Electronic Records • Other
Information relating to	• Young people (< 18) • Adults • Young people and Adults
Is the person responsible known	• Yes • No • Not sure
Location of the breach (building, room, online etc)	
Details of breach (continue on separate sheet if needed)	
Paper Records only: Date paper sent to Data Protection officer	
Photo available of scene	Yes / No

Signed Date