



Online Scout Manager and The Scout Association Partnership

We're very excited to announce how the first phase of our partnership between The Scouts and Online Scout Manager (OSM) will work. This document provides the detailed background to the project: a high level summary and FAQs are already posted on scouts.org.uk/OSM

Most Scout Groups have been using Online Scout Manager for years so they will already be aware of the benefits it brings at a local level – volunteers frequently tell us that OSM has helped them deliver better programmes and open up more sections..

You may be aware that Online Scout Manager is used by other similar national associations around the world (e.g. Scouts, Guiding, Boys' Brigade, Girls' Brigade etc). Volunteers in those associations see all of the benefits of the OSM that you receive, and they also receive many other benefits as OSM is their official system. For example, manual processes such as the census are fully automated.

This first project together will explore two areas:

- For Groups that opt-in, the safeguarding team may access specific personal details (name/DOB/contact details) of members in OSM as a last resort if the information cannot be obtained through the usual channels or in the event of an emergency. This is only accessible by the safeguarding team, used to protect children, and their access will be logged within OSM's audit trail for you to see.
- Gaining important real time insights into Scouting nationally that we can use to improve the support provided for local Scout Groups and increase external funding of Scouting. Authorised staff at The Scouts will be looking at anonymous data in OSM, which is not personally identifiable. This will be general membership data (numbers, ages, postcodes, genders, groups) to report on national trends and not at local group level.

Groups will opt-in to being part of the pilot - we hope everyone will consent so that we can move to a more permanent partnership that will allow even more out-the-box functionality to be enabled in OSM to help Scouting at all levels.

Districts and counties will not have access to any new data/functionality within OSM through this project, although we may share some aggregated statistical data to enable them to support you.



As with any partnership between 2 organisations it is essential that the interactions between them are understood and agreed. This is especially true when considering any personal data that may be shared between the 2 organisations.

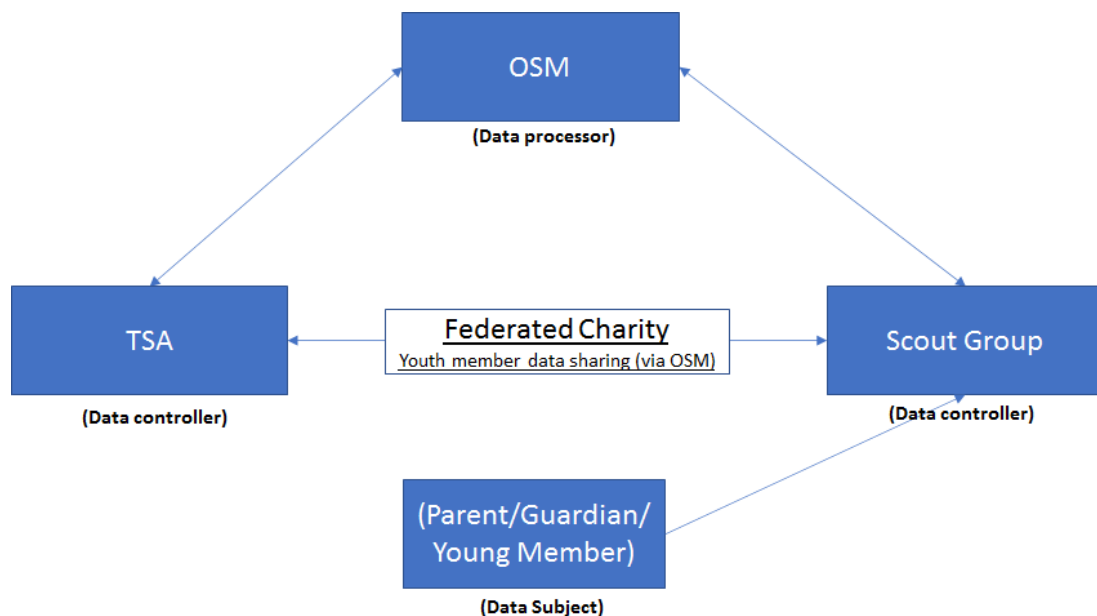
The sensitivity of the access to this type of data and the complexity of The Scouts federated charity structure has been assessed thoroughly. We have had extensive consultations with multiple experts including the ICO and have considered multiple potential ways of moving forwards before developing this detailed project plan.

Part of that due diligence was the creation of this guide for local Scouting and the Executive Committees to provide transparency on the formal assessment processes adopted by The Scouts and to assist you in your obligations under the Data Protection Act 2018 as data controllers.

Key players

Today, local Scout Groups act as independent data controllers for youth membership data. This means you make decisions on the youth data you gather, how you use it, how you secure it, who you share it with and how you securely destroy it. In many cases this is carried out via the OSM platform as the primary youth membership system in use across local Scouting.

The relationship between OSM and The Scouts introduces a link between The Scouts and local Scouting with regards to the youth member data in OSM. As a result, it is key to understand what effect this relationship has on the data subjects (youth members and their parents/guardians) and how they should be informed of this change. The below diagram breaks this relationship down:



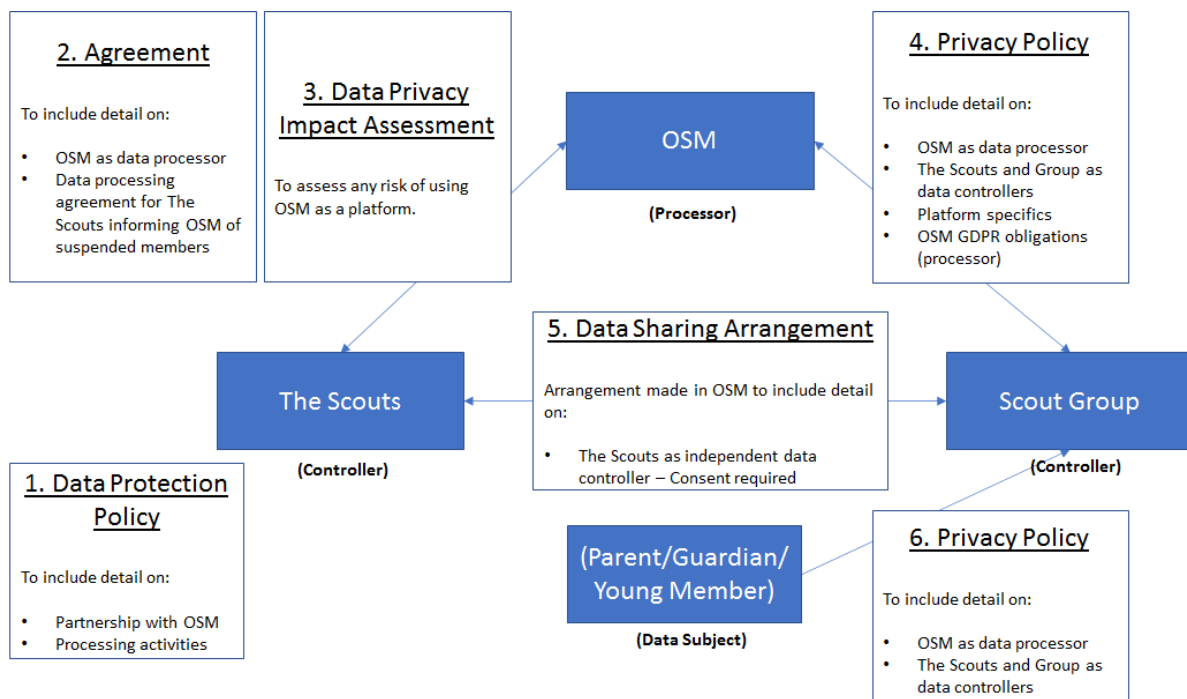


The diagram shows the following:

- **Scout Groups** Executive Committees are independent **data controllers** for youth membership data and that of their parents.
- **Online Scout Manager** are the **data processor** for youth member data and that of their parents/guardians as they manage the OSM platform where the data resides
- **The Scouts** will become an independent data controller of the member data that they take from OSM and put into their systems in the event of them using OSM to obtain the information, which will only be as a last resort or emergency for a specific safeguarding case. This is a subtle but important point as the member's name, contact details and date of birth will be added to their internal safeguarding systems, which will make them a data controller of that data too. This will not give them any rights to edit the data in OSM, and The Scouts will be liable for the security of the data in their systems.

How this will be achieved

The Scouts Information Governance team have been working closely with OSM and the Information Commissioners Office (ICO) to form an appropriate arrangement between all key players and to be transparent with the data subjects. Due to the complexity of The Scouts federated charity model it is important to understand how this arrangement has been formed. The below diagram details the individual parts of this arrangement:





The parts of the diagram above are explained in more detail below:

1. **Data Protection Policy** – policy that details The Scout's data protection stance. This will be updated to include detail on the OSM partnership and the data processing activities. No local action is needed here.
2. **The Scouts-OSM Agreement** – formal agreement between The Scouts and OSM. This will detail the terms of the arrangement and the data processing activities as part of this relationship. No local action is needed here
3. **Data Privacy Impact Assessment** – risk assessment of any data processing related risks there may be as part of this arrangement. This will include the mitigations to those risks. No local action is needed here
4. **OSM Privacy Policy** - policy that details OSM's data protection stance. This will be updated to include detail on The Scouts partnership and the data processing activities.
5. **The Scouts Data Sharing Arrangement** – arrangement between The Scouts and the Local Scout Groups so that The Scouts can gain access to OSM members personal data for the management of cases by The Scouts Safeguarding team as a last resort. This will only take place with the consent of the local Scout Groups.
6. **Local Scout Group Privacy Policy** - policy that details the local Scout Group's data protection stance. This should be updated to include detail on the use of OSM by the local Scout Group and the data sharing that will take place with The Scouts via the OSM platform. Local action needed here: details below.

The data processing activities that are accomplished as part of this arrangement are as follows:

1. **Transfer from The Scouts to OSM** - The transfer of personal data (name) from The Scouts to OSM on an ad hoc basis when The Scouts deem it necessary to inform OSM of individual members suspension from the Movement. The purpose is to inform OSM of users that should have access removed from OSM
2. **Accessing OSM data from The Scouts** - The accessing of OSM membership personal data via the OSM platform. This is to be restricted to the Safeguarding team and access is limited to only staff members that require it to assist in timely response to Safeguarding cases as a last resort. This is only accessible by the safeguarding team, used to protect children, and their access will be logged within OSM's audit trail for you to see.
3. **Gaining important real time insights** into Scouting nationally that we can use to improve the support provided for local Scout Groups and increase external funding of Scouting. Authorised staff at The Scouts will be looking at anonymous data in OSM, which is not personally identifiable. This will be general membership data



(numbers, ages, postcodes, genders, groups) to report on national trends and not at local group level.

This approach has been agreed by The Scouts Information Governance team, the OSM Data Protection Officer and the Information Commissioners Office as appropriate in accordance with the Data Protection Act 2018.

In addition, The Scouts will work with OSM to ensure the Scout Movement hierarchical structure in OSM matches the structure in The Scout's adult membership system, Compass.

What are we asking you to do?

The approach detailed in this document is dependent on local Scout Groups agreeing to the sharing of OSM youth member data with The Scouts. This is because the local Scout Groups are the data controller for the data within the OSM platform.

The arrangement from local Scout Groups will be acknowledged within the OSM platform itself with the ability to accept or reject the data sharing.

In order to ensure local Scout Groups are fully informed of this proposed arrangement and know what is required to achieve this, we have created the below checklist of activities that should be completed:

- Seek approval from the Scout Group Executive Committee to the Data Sharing Arrangement. This should be captured in the meeting minutes of the Executive Committee
- Update the local Scout Group privacy policy to inform data subjects of the Data Sharing Arrangement with The Scouts – the Scouts member site GDPR toolkit now includes an updated privacy policy template guide that can be used to assist this exercise: scouts.org.uk/privacypolicyguide
- Inform data subjects of the local Scout Group privacy policy update. This will include the youth members' parents/guardians.
 - If your Scout Group chose 'consent' as the lawful basis for processing youth member data in OSM then they would need to gain a further written consent from the parents/guardians in advance of agreeing to share personal data with TSA for this project. (NB: This only applies if you have used consent as the basis for maintaining membership records, not if you have sought consent for other areas like photography). Given the workload of doing this, and the ongoing discussions on future stages of the OSM partnership which may change these arrangements again, at this stage we would recommend that these Groups not participate in this project



Scouts

- Empower the local Scout Groups OSM admin to accept the Data Sharing Arrangement
- Accept The Scout Data Sharing Arrangement in 'Settings – Section Settings –The Scouts Pilot Partnership'. This will come with a requirement to map the Scout section to its hierarchy that has been generated as part of the mapping exercise between OSM and Compass

In the event that a Scout section does not accept the terms of the arrangement then there will be no personal data sharing between OSM and The Scouts. This option can be changed at a later date. We strongly recommend that Groups consent to this since it addresses a gap in our child protection capabilities that has been highlighted to us by the authorities.

Your Executive Committee needs to decide if it wants to consent to changes in the Data Sharing Arrangement. To make it easier for Executives to operate during the coronavirus pandemic we have changed some of our rules: scouts.org.uk/coronavirus

This includes arrangements for video conference meetings or for proposals to be adopted by email where 75%+ of committee members approve the decision.