



# Scottish Mountain Rescue General Data Protection Regulation

## Data Retention Policy

Scottish Mountain Rescue (SMR) is a membership organisation whose members are the independent MRTs that choose to affiliate. Affiliation is voluntary, free and brings the teams certain benefits in terms of representation, communication and ability to influence by attendance at facilitated meetings that guide the national and UK wide work of SMR.

It is the individual teams that respond to incidents in the wild places of Scotland, SMR is an administrative organisation with an office at Glenmore Lodge and a small staff team that works to a voluntary Executive elected from the member teams. In addition there are a number of trainers (employed and contracted) that deliver bespoke MR specific courses to MRT members.

### What personal information do we collect?

We collect the following personal information

| From                                 | Data collected   |
|--------------------------------------|--|
| Executive members                    | Personal data to allow administration of Executive including name, contact information and for the purposes of reimbursing legitimately incurred expenses, bank account details.   |
| Staff (office and employed trainers) | Personal data to allow administration of payroll, pension etc., including name, contact information, NI numbers and bank account details.  |
| Representatives of teams             | Member teams are represented by individuals and in order to provide services to the teams we collect personal data to allow administration of the membership of SMR. Including name, contact information, team the person(s) represent.  |
| Trainers (contracted)                | Personal data to allow administration of training courses and payment for their work delivering courses. Including name, contact information, UTR numbers, and bank account details.   |
| Trainers (volunteer)                 | A number of people that deliver training for us do so on a voluntary basis taking no payment. We collect from these people personal data to administer the training course on which they are working, including name and contact information.  |
| Trainees on our courses              | We collect personal data of MRT members who book on and attend courses that SMR deliver. This includes, name, MRT that they belong to, gender, contact information and dietary preferences. We also request (but do not require) that people inform us of any relevant medical issues that may affect their attendance |

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|  | at the course. We use anonymised data for purposes of statistic related to our courses.  |
| Team Opiates Servants                              | SMR holds an opiates license from the Home Office that requires us by law to hold and provide to the Home Office personal contact of people responsible for Opiates in those MRTs that hold Opiates. These people are known as Team Opiate Servants.   |
| Donors and correspondents                          | Private individuals from time to time send us unsolicited donations or correspondence to our publicly available contact addresses; email or postal. People also sometimes send us messages using social media channels; Facebook messenger, Twitter etc. By this means their personal data (name and contact information) comes in to our possession   |
| Donors using third party interfaces eg Just Giving | Third party interfaces eg Just Giving provide us with contact information of people who have created accounts to donate to SMR or occasionally individual team or teams.   |
| Media contacts                                     | We have and process personal contact information for a small number of freelance journalists that use a personal email address. We use this contact information to issue, from time to time media releases.  |
| Website users                                      | We use a contact form on our website that enables people to send us queries or other communications which are administered using a piece of software known as Flamingo.<br>The site contains onward links to google forms which we use to collect bookings for the training courses we run.<br>The 'Donate' page contains template sponsor and Gift Aid forms which may be voluntarily filled in by donors and supporters and forwarded to SMR either digitally or postally. |

### **How long will we keep personal data?**

We keep personal data for the minimum time possible that allows us to fulfil the business purpose for which that data is held.

Unless we are required by legislation, regulation, guidance from OSCR, our own constitution or other authority we will delete personal data from our systems as soon as practicably possible after the correspondence, interaction or query is complete.

We comply with any and all relevant legislation applicable to charities in Scotland which on occasion has implications for data retention eg

- Accounting legislation which requires related data to be held for 6 years.
- Retention of accident books recording medical treatments given by our staff or volunteers, legislation requires that this information is held for 7 years.

Our constitution requires (clause 53) that our Secretary retains “full name and address of each person who is (or was within the preceding 5 years) an Executive Officer or Non-Executive Officer.” SMR will therefore retain names and contact information of people who have stepped down from Executive for 5 years after they have stepped down before deleting that information from our records. The exception to this is where an individual has stepped down from Executive but continues to be active in a team role that requires SMR to retain personal data for the purposes of fulfilling that role, at that time the personal information data will be held under relevant processes and privacy notice.

### **Exceptions and variations**

Media contacts: we retain these contacts indefinitely as we believe there is a reasonable expectation on the part of the individual person that we will include them when we issue media releases. Any time we receive replies, automatic or otherwise, to the effect that the address is no longer accurate or the individual has moved on, we remove old information from our address lists immediately.

Training courses; as a matter of policy, we retain information on people (trainers and trainees) who attend our courses for a minimum of 3 years. Data is deleted at or about the turn of financial year which next occurs three years after the relevant course.

### **What rights does the individual have?**

For most personal data we hold the individual may

- Change their communication preferences or restrict processing of their personnel data in relation to specific purposes.
- Request amendments to the data we hold if they believe it is inaccurate or incomplete
- Request that we delete personal data
- See the personal data we hold by making a “subject access request.”

Exceptions occur if we are obliged by law to process data in particular ways for example provision of Team Opiate Servant information to the Home Office or retention of data in our accounts. People whose personal data is treated in this way do **NOT** have some of these rights.

To make any of these changes or to make a subject access request people can email us on [info@scottishmountainrescue.org](mailto:info@scottishmountainrescue.org), call us on 01479 861370 or contact us in writing at SMR, Glenmore Lodge, Glenmore, Aviemore, PH22 1QZ.

If you have cause for concern about how we handle data, you have the right to raise a complaint with the Information Commissioner’s Office [www.ico.org.uk](http://www.ico.org.uk)