Data Protection Policy - Scouting in Worthing Youth Join System

Last Updated: November 2025   **Policy Version:** 1.0

1. Introduction

This Data Protection Policy explains how Scouting in Worthing ("we", "us", "our") collects, uses, stores, and protects personal data through our Youth Join online enquiry system. This system allows parents and carers to submit joining requests for young people aged 4-17 years old.

We are committed to protecting your privacy and handling your personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Scouts Association's data protection policies

2. Data Controller

Each Scout Group within the Scouting in Worthing federation operates as an independent registered charity and acts as a separate data controller for the personal data it processes.

Contact Information: If you have questions about how your data is processed, please contact your allocated Scout Group directly, or email: `dpo@worthing-scouts.org.uk`

3. What Data We Collect

We collect the following personal information when you submit a joining enquiry:

3.1 Young Person Information

- Full name (first and last name)
- Gender
- Date of birth
- Home address (line 1, line 2, town/city, postcode)

3.2 Primary Contact Information

- Full name (first and last name)
- Relationship to the young person (e.g., parent, carer, guardian)
- Email address
- Phone number
- Home address (shared with young person)

3.3 Enquiry Preferences

- Available evenings for Scouting activities
- Whether the young person is currently a member of another Scout Group
- Preferred Scout Groups within Worthing

- Groups you would **not** consider

3.4 Technical Data

- IP address (for security and fraud prevention)
- Browser type and version
- Device information
- Timestamps of form submissions
- Cloudflare Turnstile verification tokens (for bot detection)

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4. How We Collect Your Data

Data is collected through:

1. **Online Form Submission** - You enter information directly into our web form hosted on Azure Static Web Apps

2. **Email Verification** - You can optionally request a "magic link" sent to your email to save progress

3. **Automated Technical Collection** - IP addresses, browser data, and security tokens are collected automatically

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5. Legal Basis for Processing

We process your personal data under the following legal bases:

Data Type	Legal Basis	Purpose
Young person & contact details	Consent	You provide explicit consent when submitting the enquiry form
IP address, security tokens	Legitimate Interest	Preventing fraud, abuse, and automated bot submissions
Draft save data (magic link)	Consent	You opt-in to receive the magic link email

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6. How We Use Your Data

Your personal data is used for the following purposes:

6.1 Primary Purposes

- **Processing your joining enquiry** - Matching young people with appropriate Scout Groups based on age, location, and preferences
- **Contacting you** - Via email and SMS to progress your enquiry (up to 3 contact attempts as per our 3-2-1 contact policy)
- **Waiting list management** - Recording your preferences and availability for future placement

6.2 Security & Integrity

- **Fraud prevention** - IP address validation, rate limiting, and replay attack detection
- **Bot protection** - Cloudflare Turnstile verification to prevent automated spam
- **System monitoring** - Logging errors and performance metrics (anonymized where possible)

6.3 Draft Saving (Optional)

- If you request a "magic link", we temporarily store your partial form data for 30 days to allow you to resume your enquiry

7. How We Store Your Data

7.1 Data Storage Locations

Data Type	Storage System	Location	Encryption
Submitted enquiries	Online Scout Manager (OSM)	UK/EU (hosted by OSM)	HTTPS in transit, encrypted at rest
Draft enquiries (magic links)	Azure Table Storage	UK South (Microsoft Azure)	HTTPS in transit, encrypted at rest
Rate limiting & replay protection	Azure Table Storage	UK South (Microsoft Azure)	HTTPS in transit, encrypted at rest
Application logs	Azure Application Insights	UK South (Microsoft Azure)	HTTPS in transit, encrypted at rest
Confirmation emails	Microsoft Graph API	UK/EU (Microsoft 365)	HTTPS in transit, encrypted at rest

7.2 Data Retention

Data Type	Retention Period	Deletion Method
Submitted enquires in OSM (not placed)	Until 3 contact attempts have been made	Manual deletion by Waiting List administrators
OSM membership record (when placed with a group)	As per individual Scout Group policies when placed	Manual deletion by Scout Group administrators
Draft enquiries (magic links)	30 days from creation	Automated deletion via Azure Table Storage TTL
Rate limiting tokens	10 minutes	Automated deletion via Azure Table Storage TTL
Replay protection hashes	5 minutes	Automated deletion via Azure Table Storage TTL
Application logs	90 days	Automated retention policy in Application Insights
Email records (Graph API)	As per Microsoft 365 retention policies	Managed by Microsoft

8. Who We Share Your Data With

Your personal data may be shared with the following parties:

8.1 Scout Groups

- Your enquiry is submitted to **Online Scout Manager (OSM)**, which is accessible by authorized volunteers from the Scout Groups you selected
- Each Scout Group will see your enquiry details to assess suitability and availability

8.2 Third-Party Service Providers

Provider	Purpose	Data Shared	Location
Microsoft Azure	Hosting, storage, logging	IP address, form data, technical logs	UK South
Online Scout Manager (OSM)	Member management system	All form data (young person, contact, preferences)	UK/EU
Microsoft 365 (Graph API)	Email delivery	Email address, names	UK/EU
Cloudflare	Bot protection	IP address, browser fingerprint, Turnstile token	Global CDN
Ordnance Survey	Address lookup (optional)	Postcode, house number	UK

All third-party processors are required to comply with UK GDPR and have appropriate data protection agreements in place.

8.3 No Third-Party Marketing

- We **never** sell, rent, or trade your personal data to third parties for marketing purposes
- We **never** use your data for automated decision-making or profiling

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9. Data Security Measures

We implement the following technical and organizational security measures:

9.1 Technical Security

- ✅ *HTTPS/TLS encryption* for all data in transit
- ✅ *OAuth 2.0 authentication* for OSM API access
- ✅ *Cloudflare Turnstile* bot protection
- ✅ *Rate limiting* to prevent abuse
- ✅ *Replay attack protection* (duplicate submission detection within 5 minutes)
- ✅ *IP address validation* for Turnstile tokens
- ✅ *Encrypted storage* for all data at rest (Azure managed encryption)
- ✅ *Application logging* with minimal PII exposure

9.2 Organizational Security

- ✅ *Access control* - Only authorized Scout Group volunteers can access OSM data
- ✅ *Role-based permissions* in OSM
- ✅ *Secure development practices*

- ✅ *Regular security updates* for all system components

9.3 Rollback Protection

- If any step in the OSM submission process fails, the system automatically **deletes** the partially created member record to prevent orphaned data

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10. Your Data Protection Rights

Under UK GDPR, you have the following rights:

Right	Description	How to Exercise
Right of Access	Request a copy of your personal data	(while in waiting list) Email dpo@worthing-scouts.org.uk (once placed) Contact your allocated Scout Group
Right to Rectification	Correct inaccurate or incomplete data	(while in waiting list) Email dpo@worthing-scouts.org.uk (once placed) Contact your allocated Scout Group
Right to Erasure	Request deletion of your data	(while in waiting list) Email dpo@worthing-scouts.org.uk (once placed) Contact your allocated Scout Group
Right to Restrict Processing	Limit how your data is used	(while in waiting list) Email dpo@worthing-scouts.org.uk (once placed) Contact your allocated Scout Group
Right to Data Portability	Receive your data in a machine-readable format	(while in waiting list) Email dpo@worthing-scouts.org.uk (once placed) Contact your allocated Scout Group
Right to Object	Object to processing based on legitimate interests	(while in waiting list) Email dpo@worthing-scouts.org.uk (once placed) Contact your allocated Scout Group
Right to Withdraw Consent	Withdraw consent at any time	Email dpo@worthing-scouts.org.uk

Response Time: We will respond to requests within **30 days**.

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11. 3-2-1 Contact Policy

To manage our waiting list effectively, we implement a **3-2-1 Contact Policy**:

- We will attempt to contact you **up to 3 times**
- Contact will be made via **both email and SMS**
- If we cannot reach you after 3 attempts, we will erase your data

This policy ensures we only store data for active, engaged enquiries.

12. Cookies and Tracking

12.1 Cookies Used

Our system uses **minimal cookies**:

Cookie	Purpose	Duration
LocalStorage (draft data)	Temporarily stores form progress on your device	Until you clear browser data or submit the form
Cloudflare Turnstile	Bot detection (does not track across sites)	Session only

We **do not** use:

- ❌ Analytics cookies (e.g., Google Analytics)
- ❌ Advertising cookies
- ❌ Third-party tracking cookies

12.2 Browser Storage

- *LocalStorage* is used to save your form progress locally in your browser
- This data *never* leaves your device unless you explicitly submit the form or request a magic link
- You can clear this data at any time by clearing your browser cache

13. International Data Transfers

Your data is primarily stored and processed within the **United Kingdom**.

Cloudflare (bot protection) operates a global Content Delivery Network (CDN), which may process your IP address and browser fingerprint through servers outside the UK/EU. Cloudflare is compliant with UK GDPR and has Standard Contractual Clauses in place.

14. Children's Privacy

Our system collects data about children aged 4-17 years old. We require **parental/guardian consent** before any data is submitted.

- Parents/carers must provide consent via the form checkbox
- We do not market directly to children
- All communication is directed to the parent/carer email and phone number

15. Data Breach Notification

In the event of a data breach:

1. We will investigate and contain the breach within **72 hours**

2. We will notify the **Information Commissioner's Office (ICO)** if required by UK GDPR

3. We will notify affected individuals if there is a high risk to their rights and freedoms

4. We will document the breach and our response

16. Changes to This Policy

We may update this policy from time to time. When we make significant changes:

- We will update the "Last Updated" date at the top of this document
- The latest version will always be available at: youthjoin.worthing-scouts.org.uk

17. Complaints

If you are unhappy with how we have handled your personal data, you can:

1. **Contact us directly** at: `dpo@worthing-scouts.org.uk`

2. **Lodge a complaint** with the Information Commissioner's Office (ICO):

18. Technical Architecture Summary

For transparency, here is the key components of our waiting list management:

- **Azure Static Web Apps**: Hosts the React/HTML form frontend
- **Azure Functions**: Serverless backend handling form submissions, validation, and integrations
- **Online Scout Manager (OSM)**: External member management system where enquiries are submitted
- **Microsoft Graph API**: Sends confirmation emails via Microsoft 365
- **Cloudflare Turnstile**: Bot protection and CAPTCHA verification
- **Azure Table Storage**: Stores draft enquiries, rate limiting tokens, and replay protection hashes
- **Azure Application Insights**: Monitors system health and logs errors
- **Ordnance Survey API**: Optional address lookup service

All connections use **HTTPS/TLS 1.2+** encryption.

19. Contact Information

For questions about this Data Protection Policy or how we handle your data:

Email: `dpo@worthing-scouts.org.uk`