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Version	Changes	By
3.0	Reviewed + reflect police vetting changes. (April 2016)	D Wraight
4.0	Updated for Lowland Rescue/GDPR requirements. (Nov 2018)	C Warburton/T Antell

Contents

1. Policy

1.1 Dorset Search and Rescue has to gather personal information in pursuance of its activities and in order to fulfil legal and ALSAR requirements.

1.2 Incumbent upon Dorset Search and Rescue is the responsibility to manage such information in a responsible manner and compliant with statutory requirements.

1.3 Dorset Search and Rescue has accommodation in the form of its HQ. However, some information in the possession of the group is retained at either the home or the workplace of the members of the Management Committee. Furthermore, all electronic equipment and data storage resources are not owned or managed directly by DorSAR.

1.4 The members of the Management Committee therefore undertake a responsibility to comply with this policy document when accepting their post, to ensure the privacy and protection of all personal information that they hold on behalf of Dorset Search and Rescue in pursuance of their specified duties

1.5 The following items shall be regarded as information provided for under this policy:

- Members Personal Details
- Missing Person Personal Details
- Operational Data (Other than that already in the Public Domain)
- Police Personnel Personal Details

- Supplier internal contact personnel details

1.6 Personal information shall be defined as any data that could directly or indirectly lead to the identification of an individual person, henceforth referred to in this policy as the "Data subject".

2. Data Protection Officer Post

2.1 Due to the nature of the records held by search and rescue organisations a requirement of ALSAR is the appointment of a Data Protection Officer Post (DPO).

2.2 The DPO shall be responsible for ensuring the team compliance with this data protection policy and the DORSAR Privacy Statement. The DPO shall report any incidents of nonconformance to the Chair. The DPO shall monitor the dpo@dorsar.org.uk email address.

3. Requirements for the Privacy & Protection of Personal Information

3.1 All personal data, regardless of medium, shall be stored in a secure location. When unattended, such data shall be held in locked conditions to prevent unauthorised access and wherever possible in an environment that ensures their preservation from the elements and extremes of temperature.

3.2 Automatic access to all personal information held shall be restricted to the members of the management committee. Disclosure of personal information beyond the management committee shall only be permitted on a "Need to know" basis to other members, suppliers, and press or in pursuance of criminal investigations and only with the full consent of the Data Subject.

3.3 Where appropriate duplicates of data stored shall be made and placed in a secured alternate location as a backup copy in case of catastrophic loss.

3.4 Members of the Management Committee shall be conversant with the security systems of all PC's used to hold personal data. Consideration shall be given to the risks of theft of hardware or access via Internet hack.

4. Requirement for handling personal Data including DBS and Police vetting Information

4.1 We are required by the police to process all members through the police vetting procedure every three years; this applies to all persons wishing to become members and those who are already members. Those members who currently hold an enhanced DBS certificate will be required to complete police vetting procedure three years after the DBS issue date.

4.2 General principles.

As an organisation, using the Police Vetting service to help assess the suitability of applicants for positions of trust, Dorset Search and Rescue (hereafter known as DorSAR) complies fully with IOC, (Information Commissioners Office) guidelines regarding the correct handling, use, storage, retention and disposal of police vetting applications.

4.3 Handling

In accordance with section 124 of the Police Act 1997, vetting information is only passed to those who are authorised to receive it in the course of their duties. Within DorSAR, this is any member of the Management Committee.

4.4 Usage

Police vetting information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

4.5 Retention

Once a recruitment (or other relevant) decision has been made, we do not keep police vetting applications for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

4.6 Disposal

Once the retention period has elapsed, we will ensure that any vetting information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, vetting information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopies of documents used to support the police vetting procedure, eg passport or driving licence. We will keep a copy of the email sent to DorSAR with the outcome of the vetting procedure; all applicants will receive an email from a member of the Management Committee with the police decision.

5. Incident Record Retention

5.1 For each callout for which DORSAR attends the search manager shall ensure copies of records (whether physical or electronic) relating to the incident are retained for 7 years and made available to the Police or other legitimate authorities on request.

6. Unauthorised Disclosure

6.1 Any unauthorised disclosure of information shall be subject to formal investigation and review by the Management Committee. Following the presentation of the documented findings, the committee shall decide if disciplinary measures are required.

7. Privacy Policy Statement

7.1 DorSAR's Privacy Policy Statement is detailed in Annex A to this protocol.

Annex A

Privacy Policy Statement

1. Introduction

1.1 We Dorset Search & Rescue (DORSAR) are committed to safeguarding the privacy of members, missing persons and their families and our sponsors, supporters and funders.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of members, missing persons and their families and our sponsors, supporters and funders; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 In this policy, "we", "us" and "our" refer to Dorset Search & Rescue (DORSAR). For more information about us, see Section 8.

2. How we use your personal data

2.1 In this Section 2 we have set out:

(a) the general categories of personal data that we may process;

(b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;

(c) the purposes for which we may process personal data; and

(d) the legal bases of the processing.

2.2 We may process data about your use of our website, databases and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system and internal database logging. This usage data may be processed for the purposes of analysing the use of the website and services, resolving bugs and creating an audit trail. The legal basis for this processing is our legitimate interests, namely managing our services, recording member qualifications and certifications and recording statistical information regarding searches and missing people.

2.3 We may process your account data ("**account data**") The account data will include your name and email address. The source of the account data is you, your team or DORSAR. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and organisation and managing DORSAR services, recording member qualifications and certifications.

2.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, telephone number, email address, profile pictures, gender, date of birth, photograph and team name. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is our legitimate

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interests, namely the proper administration of our website and organisation and managing DORSAR services, recording member qualifications and certifications.

2.5 We will process your personal data that is provided in the course of your membership of DORSAR ("**membership data**"). The data may include your name, telephone number, email address, profile pictures, gender, date of birth, photograph and team name as well as data relating to membership such as (but not limited to) qualifications, next of kin and medical history. The source of the data is you or DORSAR. It may also be generated from internal processes, databases and application logs or derived from ("**usage data**"). The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

- Some data may be passed to Lowland Rescue for processing for national registration of certifications, statistical analysis, scientific research or historical purposes.

- The legal basis for this processing is our legitimate interests, namely the proper administration of our website and organisation and managing DORSAR services, recording member qualifications and certifications.

2.6 We may process information for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and organisation and managing DORSAR services, providing historical, archival and statistical details of missing person searches.

2.7 We may process information that you provide to us for the purpose of subscribing to our email and/or text notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and organisation and managing DORSAR services and informing you when changes are made to your records.

2.8 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and organisation and communications with users.

2.9 We may process information contained in or relating to any PR, marketing or fundraising activity that you send to us ("**marketing data**"). The marketing data may include your name, address, email address and phone number. The marketing data may be processed for the purposes of sending you information about DORSAR and to raise funds by soliciting for donations or sponsorship. The legal basis for this processing is consent.

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2.10 We may process information gathered during the course of or after any incident ("**incident data**"). This data may include (but is not limited to) names, ages, dates of birth, location information such as grid references and addresses, medical conditions of missing persons or those in need of rescue.

- This data may be processed for managing Search & Rescue incidents, maintaining records of incidents for statistical and scientific research use. The legal basis for this processing is that of vital interests, where processing is necessary to protect the vital interests of the data subject or another natural person.

- In respect of the **incident data** containing medical conditions the processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

2.11 We may store and process data relating to persons who have received medical treatment from members of DORSAR ("**patient reporting data**") This data is classified as special category data (health). Our legal basis for this is Public Task, namely our responsibility for clinical governance practices and thus the in the exercise of official authority and where processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; or the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

2.12 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.13 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our organisation against risks.

2.14 In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.15 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

3.1 We may disclose your personal data to any member of our group of teams insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining

professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.3 We may disclose your personal data or the data relating to any search and Rescue operation to any legitimate request from a UK Police Service or other such statutory body insofar as reasonably necessary for the investigation of missing persons or other incidents, confirmation of the identity of legitimate search & Rescue persons and their qualifications.

3.4 Financial transactions relating to our website and services maybe handled by our payment services providers, such as PayPal, Vodafone Local Giving. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

3.5 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

4.2 The hosting facilities for our website and databases are situated in the EU, namely the United Kingdom and Ireland. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

4.3 The hosting facilities for our emergency messaging system (SMS Responder) are located within the EU, further information is available here http://sms-responder.com/content/smsr2-security.asp.

5. Retaining and deleting personal data

5.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 With regards to personal data of DORSAR team members or as it relates to records of search & rescue incidents, we will retain your personal data as follows:

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(a) Personal data relating to membership of DORSAR Teams and certification/qualifications will be retained for a minimum period of 7 years from the point that the member has left DORSAR.

(b) Personal data relating to search & rescue incidents will be retained for a minimum period of 3 years after which it will be fully anonymised before archival, subject to 5.4.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of **incident data** relating to missing person searches will be determined based on when the missing person was located which can sometimes be many months/years after the search itself.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We may notify you of changes to this policy by email or through the private messaging system on our website or database systems.

7. Your rights

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

(a) the right to access;

(b) the right to rectification;

(c) the right to erasure;

(d) the right to restrict processing;

(e) the right to object to processing;

(f) the right to data portability;

(g) the right to complain to a supervisory authority; and

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(h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

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7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 8.

8. Our details

8.1 Our website and database systems are owned and operated by Dorset Search & Rescue (DORSAR).

8.2 We are a registered charity in England and Wales under registration number 1121658, and our mail address is Dorset Search and Rescue (DORSAR), Po Box 5988, Dorchester, Dorset, DT2 9AF.

8.3 You can contact us:

(a) by post, to the postal address given above;

(b) using our website contact form;

(c) by email, using the email address published on our website from time to time.

9. Data Protection Officer

9.1 Our data protection officer is reachable at the following email address: dpo@dorsar.org.uk