

## Privacy Information Notice Accident and Incident Reporting via JotForm

### 1. Purposes of Processing

Scouting Ireland processes Accident and Incident information for the following purposes:

- To record details of accidents or incidents that occur during Scouting related activities, events, camps etc.
- To carry out follow-up checks after an incident
- To assess any ongoing risks, review trends and improve safety practices
- To support insurance claims and reporting requirements
- To comply with legal and safeguarding obligations

### 2. Personal data processed

Depending on the nature of the incident, we may collect:

- Name, Date of Birth, and contact details of the individual involved
- Parent/guardian contact details (where applicable)
- Date, time, and location of the incident
- Description of the incident
- Nature and full extent of injuries
- Names of witnesses involved
- Name of Person in charge and position held
- Name of person who incident was reported to
- Name of trained first aider

In some cases, photographs of an injured person may be added to the form. If a person can be identified in a photograph, consent will be obtained before it is included

### 3. Lawful Basis

We process personal data relating to accident and incident reports on the basis of our **legitimate interests**, namely, to ensure the safety and wellbeing of participants, to maintain appropriate records of incidents, and to meet our obligations to insurers and insurance brokers, including supporting the handling and defence of any claims.

Where we process **special category data** (such as information about injuries or health), we rely on the following additional conditions:

- **Establishment, exercise or defence of legal claims**, to ensure we can appropriately manage and respond to any current or future insurance or legal claims
- We process this under **Article 9(2)(g)** condition of the EU and UK GDPR because it is **necessary for reasons of substantial public interest**, namely to comply with legal obligations for the safeguarding and wellbeing of children and young people, the duty of care of our volunteers and those who attend Scouting related activities, events and camps. We ensure all such data is handled securely and only used for the purposes of welfare checks and incident management.
- For those in Northern Ireland an additional condition for processing required under the DPA 2018 UK is schedule 1 Part 2, paragraph 18 (1)(a) The processing is necessary to protect the physical, mental or emotional wellbeing of an individual and / or paragraph 18 (1)(b) the individual is aged under 18, or aged 18 or over and at risk.

#### 4. Third-Party Processor

We use **JotForm**, a secure online form service, to collect and store accident and incident reports. JotForm acts as a **data processor** on our behalf and **does not use the data for their own purposes**.

Data submitted through JotForm is stored securely in the EU and access is restricted to **authorised staff** within Scouting Ireland.

#### 5. Data Retention

Accident and Incident Report Forms are retained for the following:

- **Youth members or another young person:** the A&I form is retained until they reach their 21<sup>st</sup> birthday plus 3 months. Those under 18 can make a claim up until they are 21 years of age, we add in the additional 3 months to allow time for a claim to be submitted.
- **Adult volunteers or another adult:** retained for 7 years from the date of the accident. This allows time for legal claims, insurance investigations etc.

Noting for both of the above if a case is opened and continues past the retention period, the data may be retained until the case is closed.

#### 6. Data Sharing

The accident and incident report form will be shared with the Insurance broker as well as the relevant Provincial Support officer (PSO) for a follow up check with the injured party.

The form where relevant will also be shared with the National Scouts Centre Manager in relation to accidents / incidents occurring on the National Scouts Centre or network sites.

#### 7. Your Rights

Under the General Data Protection Regulation individuals have a number of rights in relation to their personal data, including the rights to:

- Request access to their personal data
- Request correction of inaccurate data
- Request erasure of data
- Request restriction of processing
- Data Portability
- Object to processing

Some of these rights may be limited where data processing is necessary for legal claims such as insurance claims.

If you have concerns about your personal data collected via the Accident and Incident Report form please contact the Data Protection Officer ([dataprotection@scouts.ie](mailto:dataprotection@scouts.ie)).

#### 8. Contact Details

If you have any questions about this processing or your personal data is handled, please contact Scouting Ireland's Data Protection Officer ([dataprotection@scouts.ie](mailto:dataprotection@scouts.ie)) or 01 4956300.

#### 9. Supervisory Agencies

If you believe that your data protection rights have been infringed, you have the right to lodge a complaint with a supervisory authority.

In Republic of Ireland the supervisory agency is the Data Protection Commission (DPC). You can

Reg. No. 397094, Charity No. CHY3507, Reg. Office - National Office, Larch Hill, Dublin 16.  
Scouting Ireland is a company Limited by guarantee exempt from using the word "Limited".

contact the DPC via the following:

**Online:** [www.dataprotection.ie](http://www.dataprotection.ie)

**Phone:** 01 765 0100 or 1800 437 737

**Postal Address:** Data Protection Commission, Pembroke Row, Dublin 2, D02 X963, Ireland

For those based in Northern Ireland the supervisory agency is the Information Commissioners Office (ICO). You can contact the ICO via the following:

**Online:** [www.ico.org.uk](http://www.ico.org.uk)

**Phone:** 0303 123 1113

**Postal Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF