

PRIVACY NOTICE FOR CADETS IN THE COMBINED CADET FORCE AND THEIR PARENTS OR GUARDIANS

*For cadets in Royal Navy, Royal Marine and Army Sections, and
for personal data held for administrative purposes on Westminster for RAF section cadets*

The Combined Cadet Force (CCF) takes our responsibility to manage and store your personal data very seriously. This document tells you what we need to do under the Data Protection Act 2018 (DPA18) and the General Data Protection Regulations (GDPR), and explains your rights as a cadet, and as a parent or guardian of a cadet in the CCF. Personal data is anything that can be used in combination to identify you as an individual. This note will tell you about what we collect, how we use it and store it.

The Ministry of Defence (MOD) is the **Data Controller** (the organisation responsible for making sure we keep your data safe and use it properly) for all personal data held by the ACF. The MOD **Data Protection Officer** is located at MOD Main Building and can be contact by:

Address: MOD Data Protection Officer, Ground Floor, Zone D, Main Building, Whitehall,
London, SW1A 2HB

E-mail: cio-dpa@mod.gov.uk

How we collect personal data

When you apply to join the CCF through your school, we will ask the school to share your personal data with us. The school will have made sure that they are happy that we will use and store your personal data properly. This data will be added to or amended as you progress through the CCF. We will also collect data about the activities and courses that you attend.

Why we collect and process personal data

The new law says that we can collect and use your personal data so that we can deliver CCF activities and training safely. To do this, we will only collect and use the minimum amount of personal data possible. This allows us to correctly identify and manage all the cadets and volunteers in the CCF. It also helps us in protecting other young people in the organisation. When you give us your personal data, we will tell you why we need it and what we will do with it. We will always look at what personal data we need to carry out this role and to make sure we only collect the minimum level possible to do this properly.

The personal data we will collect and process

The minimum level of personal data we will collect and process is:

- **Name and date of birth.**
- **Address information** such as a known contact address to direct official letters to.
- **Contact information** such as next of kin names and telephone numbers that would be used in an emergency.
- **Medical and dietary information**, but only where relevant to participation in cadet activity or where it could help save life.

If you do not agree to the CCF collecting or processing your basic personal data listed above, you will not be able to join or be a member of the organisation, because we will not be able to identify or manage you properly in the organisation, or be sure that we can properly protect other young people in the CCF.

We may ask for personal data for reasons such as e-mails for newsletters. When we do this we will provide a clear request for consent distinguishable from other matters using clear and plain language.

Sharing of personal data

The CCF may share your personal data with the police or other legal authorities where the law requires us to do so, or where there is an issue that puts the safety of cadets, volunteers or staff at risk.

We may also share your personal data with supporting organisations where they provide an activity or service for us on your behalf, such as providing you with a qualification. We will make it clear when we do this and why. At the time of writing, these organisations are:

- The school, college or academy that hosts the CCF
- The Combined Cadet Force Association (CCFA)
- The Council for Cadet Rifle Shooting (CCRS)
- CVQO

We will not share any personal data with other organisations and we will not sell on any personal data we hold. We may process your personal data to generate statistics of interest to the CCF. In this case the data will be anonymous and no one will be able to identify you from it.

Sharing of personal data by the school

When you join the CCF, we will ask the school to provide the minimum level of personal data we need to correctly identify and manage you in the CCF. We will hold this data on Westminster (for all cadets) and Bader (for cadets in CCF RAF sections only). We will work with your school to show them that we hold your personal data securely and only use it for the purposes it was intended.

Automated decision making

We do not use automated decision making in the CCF.

Training

All volunteers and staff in the CCF understand the importance of protecting personal data and must complete a mandatory training course at least every three years. Where there is a significant change in the law, then they will be given training to make sure they understand their responsibilities.

How we store personal data

All your digital personal data is held on Westminster or Bader¹ Cadet Management Information Systems. These are MOD approved secure IT systems. All CCF cadets, regardless of CCF section, are recorded on Westminster for the purposes of administration and assurance. Where we need to keep paper copies, these are stored in a securely locked filing cabinet. Only those individuals who need access to these files will be able to see them. Where we share your data with anyone else, we will insist that this is held securely as required by the new law.

Retaining personal data

We keep your data for as long as it is needed while you are a member of the CCF. The law tells us how long we need to keep some of this data, this is called a retention period. This is because we may need to provide this information later to answer requests for information or to help government organisations with inquiries. We will tell you when we must do this.

¹ For CCF RAF Section cadets and volunteers only.

Deleting or destroying personal data when no longer required

We will only keep your personal data for as long as we need. Once we no longer have a need to hold your personal data, we will delete or destroy it securely in line with the MOD policy on data destruction.

Your rights under the Data Protection Act 2018

Under the new law you have the following individual rights with regards to your personal data:

- The right to be informed about the collection and use of your personal data
- The right to access your personal data and supplementary information
- The right to have inaccurate personal data rectified, or completed if it is incomplete
- The right to erasure (to be forgotten) in certain circumstances
- The right to restrict processing in certain circumstances
- The right to object to processing in certain circumstances

Further information about your rights can be found on the ICO website.

Accessing the personal data we hold on you

If you want to find out what personal information the CCF holds on you or you want to make any corrections, you can make a request to see it. This is called a subject access request or SAR. Information about how to make a Subject Access Request (SAR) can be found at - <https://www.gov.uk/government/publications/mod-subject-access-request-form>

Very rarely there will be time when we do not have to give you the information you have asked for, but we will explain when this is the case. This is normally where it might be part of an investigation into something.

Information for cadets in CCF RAF sections only

HQ RAFAC has also issued a privacy notice for cadets in the CCF RAF sections that should be referred to for data held on Bader Cadet Management Information System. This is available via the Bader SharePoint.

How do I make a complaint if I'm not happy?

If you are unhappy with any aspect of this privacy notice, or how your personal information is being processed, you can contact the **MOD Information Rights Team** at:

Address: Ground Floor, Zone D, MOD Main Building, Whitehall, London SW12 2HB

Email: cio-dpa@mod.gov.uk

We aim to acknowledge your complaint within 5 working days and send you a full response within 20 working days. If we can't respond fully in this time, we will write to you and inform you why.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Address: Information Commissioner's Officer, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AL