

UK Fire Cadet Manager

Privacy Statement and Terms of Use

Privacy Statement

Overview

Fire Cadet Manager (FCM) is an online membership management tool that has been developed by Online Youth Manager (OYM) Ltd specifically for use by UK Fire Cadets and is licensed and provided free of charge to member services by the National Fire Chiefs Council (NFCC). It is maintained and developed by OYM but operated by the UKFCET on behalf of the NFCC.

The Purpose of FCM is to support Fire and Rescue Services (FRS) to effectively and efficiently administer their Fire cadets by providing a secure method for them to register relevant information and improve communication.

FCM has four separate stakeholder groups OYM, the UK Fire Cadets Executive Team (UKFCET), individual FRS and FCM users. All OYM, UKFCET and FRS are committed to fulfilling their requirements under the Data Protection Act 2018 by:

- Complying with both law and good practice
- Respecting individuals' rights and complying with requests where possible and in line with legislative guidelines
- Being open and honest with individuals whose data is processed
- Providing training and support for staff who handle personal data, so that they can act confidently and consistently and reduce the risk of data breaches
- Ensuring retention and disposal of personal data is adhered to
- Implementing appropriate technical and organisational security measures to safeguard personal data
- Ensuring all data is processed in the UK
- Having processes in place to monitor the quality of personal data.

The data held on the site is created and managed by individual FRS and all access to FCM is tightly controlled through customisable permissions, ensuring only the right people have access to the data held in FCM. FCM is Data Protection Act 2018 compliant, and for added reassurance, FCM is penetration tested by an external company.

FCM records personal data which means any information about a living individual who could be identified. FCM only collects the information required and it will only be used for the purpose that it has been collected for. This includes name, address, other contact details (e.g. email and telephone numbers), gender, date and place of birth, nationality, family details. The processing of personal data is covered by the Data Protection Act 2018.

The lawful basis for processing this data is based upon initial consent from the user/responsible adult representing the user. This consent will be valid for the duration of the end user participating in the fire cadet scheme. Fire Cadets are operated as part of a FRS and have a commitment to meet their Fire Safety requirements. As such, FRS legal obligation under their devolved Fire and Rescue Services legislation further supports the continued processing of this data under public task.

Role of Stakeholders

OYM

OYM is responsible for the development and maintenance of FCM, this requires that some of their employees and contractors have access to the systems that store and process your data. Their employees and contractors are prohibited from using this access to view your data unless absolutely required.

Their employees undergo periodic data, security and privacy training, and they are bound by Non-Disclosure Agreements.

OYM will report to FRS via UKFCET and Information Commissioners Office should there be a data breach.

UKFCET

UKFCET operate the system on behalf of NFCC. UKFCET staff are employees of UK FRS and as such fall under their respective services policies and procedures. Under normal operational conditions they will only have access to anonymised data for the purpose of providing statistical information relating to UK Fire Cadets (UKFC). This may be provided to an external organisation for the purpose of furthering the objectives of UKFC, for example when seeking grant funding. UKFCET staff may, only with prior agreement with relevant FRS, access all data relating that FRS to provide support with an issue. This will be time limited and will be logged and controlled by FCM.

Access will only be provided to FCM to nominated representatives from each FRS.

Individual FRS

For the purposes of the Data Protection Act 2018 individual FRS will be the data controller for their section of FCM and are responsible for the data held within their section and will have full control over the type of data and access to that data. As data controllers FRS Data Protection officers must be contacted for DP issues and Users should contact individual FRS for data protection concerns.

In addition, FRSs:

- Are responsible for retention and deletion of records they control in line with their local service Privacy Policy.
- Must comply with Safeguarding legislation and share relevant data if someone is at risk.
- Must provide users to their section of FCM with access to their organisational privacy policy.
- Must have included in their Privacy Policy an appropriate process to respond to a data breach following notification by OYM.
- Must adhere fully to the FCM Terms of Use and failure to do so may result in access being suspended or denied.

FCM Users

FCM Users have a responsibility in both providing information and in keeping the data up to date.

In relation to data held they have the certain rights¹ which must be adhered to and users can access their own data through their FCM login. FCM users should contact their local FRS for any Data Protection related issues.

Further information can be obtained by contacting the Information Commissioners Office². FRS privacy policy will be available to users from the relevant FRS.

Security Features

Logging

Usage of FCM by FRS, UKFCET and OYM is logged. OYM track every login, including the time, device details, IP address and a fingerprint of the device. This data is automatically purged after a period of six months.

Access Control

The following controls are in place:

- A password policy requiring passwords to be at least 8 characters with two different types of characters, and that the password is not in the top 10,000 commonly used passwords. Passwords are stored using a non-reversible method.
- A compulsory secondary layer of authentication that requires all users to enter certain characters from an answer to a security question when they logon on a new device (if they aren't using Two Factor Authentication). The available security questions are obscure and are unlikely to be known by others.
- If users forget their credentials, they can only reset their password after receiving an email with a time-restricted link. If they have forgotten their security answer, they can only reset their password after a text message/phone-call with a verification code.
- Users can opt to use Two Factor Authentication that provides them with a code that expires in 60 seconds.
- Users are automatically logged out of the system after a period of inactivity.
- Users who attempt to login with invalid credentials too many times will be temporarily blocked from the system.
- Users are encouraged to periodically review their access control lists to ensure fellow users have the right access.

¹ Web: <https://ico.org.uk/your-data-matters/>

² Web: <https://ico.org.uk/global/contact-us/>

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Terms of Use

FCM is made available to individual FRS based on these Conditions. By registering to use FCM via the Website, you agree to these Conditions, which will bind you.

NOW IT IS HEREBY AGREED as follows:

1. Acknowledgements

- 1.1. These Conditions apply to FCM and any and all the services accessible through FCM, including any updates or supplements to the same.
- 1.2. We may change these terms at any time by notifying you of a change when you next log onto FCM. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of FCM.
- 1.3. By using FCM, you acknowledge and agree that internet transmissions are never completely private or secure. You understand that any message or information you send via FCM may be read or intercepted by others, even if there is a special notice that a transmission is encrypted.

2. Use of FCM

- 2.1. FCM is made available free of charge but is only made available to you when you are authorised by us or your Fire and Rescue Service to use FCM. The authorisation for your use of FCM may be withdrawn from time to time without reason, and without prior notice, including but not limited to in circumstances where you have failed to comply with these conditions.
- 2.2. We do not guarantee that FCM, or any content on it, will always be available or be uninterrupted. Access to FCM is permitted on a temporary basis. We may suspend, withdraw, discontinue or change all or any part of FCM and/or its functionality without notice. We will not be liable to you if for any reason FCM is unavailable at any time or for any period.
- 2.3. We, and OYM as our third-party website hosting provider, are entitled to monitor your usage and use of FCM from time to time, and without notice to you.

3. Responsibility of each FRS

- 3.1. To have in place appropriate data management processes in line with each services policies and procedures.
- 3.2. To co-operate with the UKFCET in all matters relating to FCM.
- 3.3. To make all arrangements necessary for staff to have access to FCM.
- 3.4. To ensure that staff or volunteers who are granted access to FCM are aware of these conditions and other applicable terms and conditions, and that they comply with them.
- 3.5. To only use FCM for the purpose that it has been designed to record and store information relating to UK Fire Cadets.
- 3.6. To ensure that staff and volunteers understand the need to set a robust password and to keep this confidential.

- 3.7. To ensure that staff and volunteers have an awareness of the requirement to protect data relevant to individuals and restrictions on sharing such data.
- 3.8. Only to upload content which they have the right to do so and that does not infringe on any other persons intellectual property rights, or of their right to privacy.
- 3.9. To be responsible for any data they download from FCM.
- 3.10. Complete the annual Self-evaluation and declaration process. See Appendix A.

4. Acceptable use restrictions

FRS must not:

- 4.1. Use FCM in any unlawful manner, for any unlawful purpose, or in any manner inconsistent with these Conditions, or act fraudulently or maliciously, for example, by hacking into or inserting malicious code, including viruses, or harmful data, into FCM or any operating system.
- 4.2. Infringe our intellectual property rights or those of any third party in relation to your use of FCM, including the submission of any material (to the extent that such use is not licensed by these Conditions).
- 4.3. Transmit any material that is obscene, indecent, pornographic, seditious, defamatory, offensive, threatening, liable to incite racial hatred, menacing or otherwise objectionable in relation to your use of FCM.
- 4.4. Use FCM in a way that could damage, disable, overburden, impair or compromise our systems or security or interfere with other users.

**NFCC UK Fire Cadets
Fire Cadet Manager
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Declaration**

Individual services only have access to information relevant to their service, are responsible for the data held within their section and will have full control over the type of data and access to that data. They are responsible for retention and deletion of records they control in line with their local service policy. However, the UK Fire Cadets Executive team, on behalf of NFCC, are required to evidence that services are complying with the Privacy Statement and Terms of Use. To assist us with this please complete the questions below.

Name of Fire and Rescue Service: _____

	Yes	No
1 Have you read and understood the Privacy Statement and Terms of Use?	<input type="checkbox"/>	<input type="checkbox"/>
a) Has this been made available to all Fire Cadets staff and volunteers that will use the platform?	<input type="checkbox"/>	<input type="checkbox"/>
b) Does your FRS comply with the Privacy Statement and Terms of Use?	<input type="checkbox"/>	<input type="checkbox"/>
2 Have all your staff and volunteers accessing FCM had safeguarding checks appropriate to their role and relevant legislation?	<input type="checkbox"/>	<input type="checkbox"/>
3 Does each person logging on have an individual user email and login?	<input type="checkbox"/>	<input type="checkbox"/>
4 Does your FRS have a Privacy Policy that complies with relevant legislation?	<input type="checkbox"/>	<input type="checkbox"/>
a) Do your policies and procedures for the use of FCM comply with this?	<input type="checkbox"/>	<input type="checkbox"/>
5 Have staff and volunteers had training on the need for effective data management and GDPR?	<input type="checkbox"/>	<input type="checkbox"/>

Completed by: _____

Position: _____

Email: _____

Telephone: _____

Signature: _____ Date: _____

Please return to UKFireCadets@nationalfirechiefs.org.uk by the end of June . Failure to do so may result in access being suspended or denied.