

**NFCC Fire Cadets
Fire Cadet Manager
Data Protection Impact Assessment (DPIA)**

The need for a DPIA

Fire Cadets are delivered by employees and volunteers supported by their local FRS. They engage young people between the ages of 13 – 18 with a vision of impacting young people and their communities by enhancing opportunities for further education, employment and training. Fire cadets also provide a range of wellbeing and development opportunities for adult instructors.

This assessment will focus on both the young people and adults who will be referred to as members. Young people by the nature of them being young people will be considered a vulnerable group.

The UK Fire Cadets (UKFC) want to make a version of the Online Youth Manager system available to all UK Fire and Rescue Services under the bespoke title of Fire Cadet Manager (FCM).

Fire Cadet Manager (FCM) is an online membership management platform that has been developed by Online Youth Manager (<https://www.onlineyouthmanager.co.uk/>) (OYM) Ltd specifically for use by UKFC and is licensed and provided free of charge to member services by the National Fire Chiefs Council (NFCC).

The platform has three separate stakeholder groups OYM, the UK Fire Cadets Executive Team (UKFCET) and local Fire and Rescue Services (FRS). For the purposes of GDPR OYM and UKFCET will be data processors and local FRS will be the Data Controllers. Local FRS refers to the service responsible for the unit which the member attends

The platform records personal data which includes:

- Name
- Address
- Email and telephone numbers
- Gender
- Date of birth
- Nationality
- Next of Kin/ Emergency Contact details
- Progress on Fire Cadet Award

This data processing has several risks which must be considered:

1. The platform will be managed by UKFC (As Data Processors) but operated by individual FRS who will allocate rights to staff and volunteers as Data Controllers.
2. The platform will record data on young people under the age of 18 years and hold information of the responsible person if young person is under 18.
3. The platform will have a high number of users able to access and amend data, this could affect data security.
4. This is a new system for UKFC and as such process and protocols, whilst tested elsewhere, have not been scrutinised in this environment.
5. Information will be held on 3rd party server.

A privacy statement will be available via the landing page or from the local FRS.

The nature of the processing.

How we collect the data:

Data will be collected by individual FRS, normally using a simple form, at time of registration. An email will then be sent to a responsible adult identified at the time of registration. The adult will then be able to create a log in and complete the information required for that child.

Fire Cadets Award data and other member achievements will be entered by employees or adult volunteers.

How we use the data:

The data is needed to monitor a member's progress whilst a member of Fire Cadets. It will be used to contact and inform the individual and/or responsible adult of upcoming events and activities that they may wish to participate in or in case of emergency.

Fire Cadets require this information to operate effectively, efficiently and safely however participation in FCM manager is voluntary and FRS could choose to provide an alternative storage format if members requested it. this would be at the discretion of the local service.

Who we share the data with:

A young person's personal information will only be shared if there is a wellbeing or safeguarding issue in which case the local FRS safeguarding processes will be followed. In some cases where a member wished to complete an award, attend an external event or moves to another FRS their name and relevant details will be sent to the awarding body or organising agency.

OYM and UKFC will be able to access anonymised data for evaluation and reporting purposes. Information is shared outside of individual FRS for text messaging, email providers and payment providers for the instances where users send text messages, emails, and when payments are collected via the payment providers and/or on the occasion that a young person moves from one FRS to another.

Retention periods:

There is no express legal provision for length of retention of personal data, however the main principle is that personal data should not be stored for longer than necessary. Data retention periods will be subject to individual FRS's Information Governance processes.

High risk screening criteria:

There is potential that due to the general vulnerability of young people that the data held could be high risk.

Storage of the data:

Data is replicated in two separate data-centres from separate providers in London to ensure that we can provide business continuity. We have off-site backups in a third location.

Access to the data:

Each individual FRS manages access to data relevant to them and this must be recorded locally in line with each services process. OYM and UKFCET will have access to anonymised data for evaluation and monitoring purposes.

Special category information being processed:

Equal opportunities monitoring data, which may include racial and/or ethnic origin, Health and Medical

Security Measures:

For security measures and GDPR statement of OYM as third- party providers, see link below:

<https://fcm.firecadets.org.uk/security.html>

The scope of the processing:

Nature of personal data:

The platform records personal data which includes:

- Name
- Address
- Email and telephone numbers
- Gender
- Date of birth
- Nationality
- Next of Kin/ Emergency Contact details
- Progress on Fire Cadet Award

Sensitivity of the personal data:

Some of the data relates to young people who are recognised as a vulnerable group.

Duration of the processing:

Data will be subject to frequent processing, potentially on a weekly basis, by up to 43 FRS giving a total of 350 staff and volunteers for as long as the subject remains a member of Fire Cadets.

Geographical area covered:

FCM is available to all UK FRS.

Extent and frequency of the processing:

The system will be accessed by various users on daily basis. This will be to complete registers and update achievements, send communications carry out statistical reports.

Number of data subjects involved:

It is expected that in the system will hold details of 5,000 members. Each FRS will be responsible for managing the data relevant to their service this will include keeping it up to date and the deletion of data no longer required.

The context of the processing

Nature of our relationship with the individual:

Members will be either young people who have voluntarily joined Fire Cadets, Adult Volunteers who have voluntarily joined Fire Cadets or employees of local FRS. They will provide the data on a voluntary basis.

Extent to which individuals are likely to expect the processing:

Members will be informed of the processing when they join their local Fire Cadets and will be fully aware that the data is being held and purposes of processing.

Are there prior concerns over this type of processing or security flaws:

Concerns over this type of processing or security flaws include:

1. The platform will be managed by UKFC but operated by individual FRS who will allocate rights to staff and volunteers.
2. The platform will record data on young people under the age of 18 years.
3. The platform will have a high number of users able to access and amend data.

4. This is a new system for UKFC and as such process and protocols, whilst tested elsewhere, have not been scrutinised in this environment.

Current issues of public concern:

No issues of public concern have been identified.

Compliance with GDPR codes of or GDPR certification schemes:

For GDPR compliance see the attached OYM Security and GDPR statement.

Individuals and nominated responsible adults will be able to log on and view their personal data at any time and have the right to ask for amendments.

GDPR and DPA 2018 has been considered and will be complied with. As the service providers OYM have an important role to play in this and their security and GDPR statement can be found here:

<https://fcm.firecadets.org.uk/security.html>

Extent to which individuals have control over their data:

Any information retained is accessible by the individual or their parent/carer if appropriate. Users will be able to update their own data. As part of the enrolment the individual or their parent/carer if appropriate are asked to complete the registration process, they will be informed at this point that they can revisit this to update any data. FRS will have designated person responsible for ensuring that data is up to date UKFCET will require annual conformation from services that this is in place.

Inclusion of children or other vulnerable groups:

Yes, children under the age of 18 years. The processing of information will be relevant to vulnerable groups/children such as completed application forms and information described in the scope of the processing

Source of the data:

Users or their parent carer, where appropriate will provide the data.

Compliance with relevant codes of practice:

Compliance with relevant codes of practice has been considered as not relevant to an organisation of this size.

Previous experience of this type of processing:

The information being processed is not new and is currently held in hard copy. This is the first time it has been held and processed in this format.

Our partner OYM are an expert in the provision of this platform and work with organisations worldwide.

The purposes of the processing:

Legitimate interests:

The information will be processed to enable a safe, efficient and effective experience for each member and will reduce the administrative burden on adult instructors enabling more time to be spent on face to face delivery. The platform will improve on existing paper-based systems by having security processes built in and quality assured. It will enable a standard system across the UK reducing the risk for individual services by improving the quality of the data being held, building corporate knowledge of what is being held and ensuring that this is captured by FRS data management processes.

Local FRS require this information to be able to engage effectively and safely with members and support the m to maximise the safety of the wider community. The programme offered by Fire cadets will strengthen

and build on both local and national priorities to support the positive development of members, aligning with all Governments agenda and priorities.

Expected benefits for Fire Cadets or for society as a whole:

Fire Cadets will promote diversity and seek to see this diversity reflected in future years within the FRS as young people may consider a career in the service. FRS reputation will be enhanced through greater community engagement empowering young people to carry our key safety messages.

Fire cadets aims cross cuts numerous governments, local authority and social agendas in terms of supporting and promoting citizenship, health and wellbeing and reducing inequalities. The programme will assist members to make positive choices; building their confidence, increasing skills and capacity for further learning and employability whilst contributing towards the drive for positive destinations as part of a wider social agenda. Social action and volunteering activities within the core programme syllabus will be created in partnership with young people, volunteers and local communities.

Outcome for individuals:

1. Members will have a practical understanding of the SFRS and play supportive roles in preventative community safety by developing positive peer relationships
2. Members will become successful learners, confident individuals, responsible citizens and effective contributors as well as being equipped with improved life skills
3. Members will have increased capacity for further learning, employment or volunteering.
4. Members will have improve health and wellbeing by providing a range of information and resources for young people (and adult volunteers)

Consultation process

UKFC is a collaborative approach to service deliver supported by the National Chief Fire Officers Association. It consists of 43 individual FRS all of whom have been given the opportunity to comment on the development of FCM and access support from subject experts within their own service.

FCM with requires support from local FRS Information Governance professionals.

OYM are an expert in the provision of this platform and work with organisations worldwide.

Necessity and proportionality

How our plans achieve our purpose:

Yes, the role out of FCM will further the objectives of UKFCET by:

- Reducing the administration required to run each unit thus freeing up instructor time to engage with the young people.
- Reduce the risk for FRS who may currently be using paper-based systems.
- Improve communication between the local units and their members enabling them to keep them updated on developments which many affect them.
- Provide a user driven process to ensure that data is relevant and up to date.
- Support a sense of belonging by promoting the idea of a national organisation.
- Provide efficiency savings for FRS by using a collaborative approach.

Lawful basis for the processing:

The lawful basis for processing this data is based upon consent from the user/ responsible adult representing the user. 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 processing of this data.

Ensuring data quality:

UKFC will provide training for service representatives that will be cascade within each service. Users play an active role in inputting their data into the system and keeping it up to date, this will contribute to avoiding any misinterpretation of data provided.

Individual FRS will be responsible for ensure the quality of data within their control and will be supported by a self-evaluation tool.

How we intend to provide privacy information to individuals;

Privacy information will be provided at the time of joining and will be available as a link on the platform.

Ensuring our processors comply:

The platform has a designed in logging process which monitors use supported by review meetings will ensure that processors comply with the systems. There is a hierarchy of control for providing access. Access is granted to UKFCET by OYM following a request in writing by the chair or national manager. The Chair or national manager will approve a service representative who will have management rights for that FRS's data. Each service representative will only be able to access their FRS data and will have responsibility to manage who is able to access information within their sphere of control. A set of terms of use will be used and UKFCET will require FRS's to confirm compliance with this on an annual basis.

Consideration of alternatives:

This is being developed as an improvement to the current paper-based system which requires more resources and has a higher level of risk for organisations. This is due to the platform being:

- more robust to manage and monitor access
- Increased flexibility for approved users to access and identify individual records, this includes remote access.
- Easier to keep up to date and delete data when a user's leaves.
- Storage of data is more robust for example risk to paper-based system from fire.
- More secure than paper-based systems which don't have comparable security measure built in.

Preventing function creep:

Changes to the system will be approved by the UKFCET and agreed with OYM. Local FRS will be informed of any changes.

We will prevent function creep by making a clear declaration of purpose and maintaining a policy for FRS to be able to report use of the system which is not aligned with the purpose.

Ensuring data minimisation:

FRS will be responsible for ensuring data minimisation in line with local processes and will be supported by a self-evaluation tool.

Implement & support individuals rights:

Members will be informed of their rights on joining the platform and by a link on the platform.

A set of terms of use will be used and UKFCET will require FRS's to confirm compliance with this on an annual basis.

STEP 5: Identify and assess risks

Describe the source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
		Remote, possible or probable	Minimal, significant or severe
Inability to exercise rights (including but not limited to privacy rights);	Remote	Minimal	Low
lack of informing data subject how their data is processed	Remote	Minimal	Low
not keeping data up to date	Remote	Minimal	Low
Inability to access services or opportunities;	Remote	Minimal	Low
Loss or control over the use of personal data;	Remote	Minimal	Low
Discrimination;	Possible	Minimal	Low
Identity theft or fraud;	Remote	Minimal	Low
Financial loss;	Remote	Minimal	Low
Reputational damage;	Remote	Minimal	Low
Loss of confidentiality;	Remote	Minimal	Low
Re-identification of pseudonymised data;	Possible	Minimal	Low
Data retention	Possible	Minimal	Low
Data security when held by 3rd party	Possible	Minimal	Low
unauthorised access	Possible	Minimal	Low
Local FRS standards may not meet the expectations of this DPIA	Possible	Significant	medium

Low Overall Risks	Summary of controls contained in the DPIA
Inability to exercise rights (including but not limited to privacy rights);	Information on rights, implementing them and how to raise a concern is contained in the privacy statement which will be available via the landing page or from the local FRS.
lack of informing data subject how their data is processed	Information on how their data is processed and how to raise a concern is contained in the privacy statement which will be available via the landing page or from the local FRS.
not keeping data up to date	Individuals and their responsible adult where appropriate will be able to log on to the platform and ensure contact information is up to date.
Inability to access services or opportunities;	Information on services or opportunities will be improved by the option to create group emails or text messages. Individuals and their responsible adult where appropriate will be able to log on to the platform and ensure contact information is up to date.
Loss of control over the use of personal data;	Individuals and their responsible adult where appropriate will always be able to log on to the platform and view their personal data.

Discrimination;	Equality and diversity training and codes of conduct carried out by individual SFR's will minimise the risk of discrimination.
Identity theft or fraud;	The platform has robust security measures in place to protect the data held.
Financial loss;	No financial information will be stored on this platform
Reputational damage;	The details set out in the Security and GDPR statement will minimise the risk of incidents that could cause reputational damage. https://fcm.firecadets.org.uk/security.html
Loss of confidentiality;	The details set out in the Security and GDPR statement will minimise the risk of loss of confidentiality. https://fcm.firecadets.org.uk/security.html
Re-identification of pseudonymised data;	All access to OYM is logged and any attempts to Re-identify pseudonymised data would be registered. Staff using pseudonymised data receive training on GDPR and are subject to vetting.
Data retention	Each FRS is responsible for controlling their own data and would retain this in line with local policies. Corporate knowledge of what is being held will ensure that this is captured by FRS data management processes
Data security when held by 3rd party	Data security with 3 rd parties is subject to a contract between OYM and NFCC. Staff within each receive training on GDPR and are subject to vetting. All access to OYM is logged and any attempts to access data inappropriately would be logged.
Unauthorised Access	There is a hierarchy of control for providing access. Access is granted to UKFCET by OYM following a request in writing by the chair or national manager. The Chair or national manager will approve a service representative who will have management rights for that FRS's data. Each service representative will only be able to access their FRS data and will have responsibility to manage who is able to access information within their sphere of control.

STEP 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5.

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated, reduced or accepted	Low, medium or high	Yes/No
Local FRS standards may not meet the expectations of this DPIA.	To monitor quality UKFCET will introduce an annual self-evaluation and confirmation process where local FRS provide UKFCET with conformation of standards.	Reduced	low	Yes

STEP 7: Sign off and record outcomes

Info Gov Manager advice provided:

Information Governance were consulted, and the document amended to reflect their advice.

Info Gov Manager advice accepted by: Alistair Macintosh UK Fire Cadets National Manager

Consultation responses reviewed by: Alistair Macintosh UK Fire Cadets National Manager

Comments:

Key Stake holders (OYM, Information Governance & Service users) have been engaged in the development of this DPIA

This DPIA will be kept under review by: Alistair Macintosh UK Fire Cadets National Manager

Review date: 31/03/2021

Measures approved by:

Name: STEVEN ADAMS **Signature:** 

Designation: COMPANY SECRETARY **Date:** 15.7.20

Residual risks approved by: No residual high risks