

# STOURBRIDGE HF RAMBLING CLUB

Local Group of HF Holidays Ltd



[www.shfrc.org.uk](http://www.shfrc.org.uk)

## DATA PROTECTION POLICY

### SCOPE OF THE POLICY

This policy applies to the work of Stourbridge HF Rambling Club (hereafter 'SHFRC'). The policy sets out the requirements that the SHFRC has to gather personal information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the SHFRC Committee Members to ensure that the SHFRC is compliant. This policy should be read in tandem with the SHFRC's Privacy Policy.

### WHY THIS POLICY EXISTS

This data protection policy ensures that the SHFRC:

- Complies with data protection law and follows good practice.
- Protects the rights of members.
- Is open about how it stores and processes members data.
- Protects itself from the risks of a data breach.

### GENERAL GUIDELINES FOR COMMITTEE MEMBERS

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members of the SHFRC.
- Data should not be shared informally or outside of the SHFRC
- The SHFRC will provide induction training to committee members to help them understand their responsibilities when handling personal data.
- Committee Members should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Personal data should not be shared outside of the SHFRC unless with prior consent and/or for specific and agreed reasons.
- Member information should be reviewed and consent refreshed periodically via the membership renewal process or when policy is changed.

### DATA PROTECTION PRINCIPLES

The General Data Protection Regulation identifies 8 data protection principles.

#### **Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner**

The SHFRC requests personal information from potential members and members for the purpose of sending communications about their involvement with the SHFRC. The forms used to request personal information will contain a privacy statement informing potential members and members as to why the information is being requested and what the information will be used for. Members will be asked to provide consent for their data to be held and a record of this consent along with member information will be securely held. SHFRC members will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once a SHFRC member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken.

#### **Principle 2 - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.**

Members will be informed as to how their information will be used and the Committee of the SHFRC will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about the SHFRC's events and activities

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- Communicating with members about their membership and/or renewal of their membership.
- Communicating with members about specific issues that may have arisen during the course of their membership.

The SHFRC Committee will ensure that only appropriate communications are made. Inappropriate communication would include sending SHFRC members marketing and/or promotional materials from external service providers.

**Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.**

Members of the SHFRC will only be asked to provide information that is relevant for membership purposes. This will include:

- Name.
- Postal address.
- Email address.
- Telephone number(s).
- Emergency contact.

Where additional information may be required, this will be obtained with the specific consent of the member who will be informed as to why this information is required and the purpose that it will be used for.

Photographs may be taken on rambles and at SHFRC social events for inclusion, without names, on the club website, social media or calendar. Photographs which show children will not be published without the consent of parent or guardian.

There may be occasional instances where a members' data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or the SHFRC in these instances where the SHFRC has a substantiated concern then consent does not have to be sought from the member.

**Principle 4 – Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.**

The SHFRC has a responsibility to ensure members' information is kept up to date. Members will be informed to let the membership secretary know if any of their personal information changes. In addition, on an annual basis the membership renewal forms will provide an opportunity for members to resubmit their personal information and reconfirm their consent for the SHFRC to communicate with them.

**Principle 5 – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.**

The SHFRC will delete/destroy personal data within 12 months of membership ceasing unless there are insurance or legal reasons for retaining. The SHFRC may store photographs and programmes indefinitely in its archive/website.

**Principle 6 - Personal data must be processed in accordance with the individuals' rights.**

The SHFRC will ensure that members' information is managed in such a way as to not infringe an individual members rights which include:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.

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**Principle 7 - Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.**

The committee members of the SHFRC have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee Members using strong passwords.
- Committee Members not sharing passwords.
- Restricting access of sharing member information to those on the Committee who need to communicate with members on a regular basis.
- Using password protection on laptops and PCs that contain or access personal information.
- Using password protection or secure cloud systems when sharing data between Committee Members.
- Shredding of hardcopy documents before disposal.

**Principle 8 - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.**

## Accountability and Governance

The SHFRC Committee are responsible for ensuring that the SHFRC remains compliant with data protection requirements and can evidence that it has. For this purpose, those from whom data is required will be asked to provide written consent. The evidence of this consent will then be securely held as evidence of compliance. The SHFRC Committee shall ensure that new members joining the Committee receive an induction into how data protection is managed within the SHFRC and the reasons for this. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

## Subject Access Request

SHFRC members are entitled to request access to the information that is held by the SHFRC. The request needs to be received in the form of a written request to the Membership Secretary of the SHFRC. On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. The SHFRC will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

## Data Breach Notification

Were a data breach to occur action shall be taken to minimise the harm by ensuring all Committee Members are aware that a breach had taken place and how the breach had occurred. The Committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Committee shall also contact the relevant SHFRC members to inform them of the data breach and actions taken to resolve the breach.

If a SHFRC member contacts the SHFRC to say that they feel that there has been a breach by the SHFRC, a Committee Member will ask the member to provide an outline of their concerns. If the initial contact is by telephone, the Committee Member will ask the SHFRC member to follow this up with an email or a letter detailing their concern. The concern will then be investigated by members of the Committee who are not in any way implicated in the breach. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Policy review date: 14 May 2018