

Friends of Anderton and Marbury (FoAM)

Data Protection Policy

Background

The Information Commissioner's Office has published a checklist highlighting 12 steps to prepare for the General Data Protection Regulation (GDPR), which applies from 25 May 2018.

Many of the GDPR's main concepts and principles are much the same as those in the current Data Protection Act, but there are new elements and significant enhancements.

FoAM Committee members have reviewed and are aware of the requirements under GDPR and have assessed the personal data held by the group against these requirements. In preparing this Data Protection Policy, the Committee notes that FoAM:

- does not hold the personal data which a FoAM Member or any other individual may supply to Cheshire West and Chester Council as part of the Council's volunteer induction program (such data is held by Cheshire West and Chester Council);
- has no employees, so does not hold any employment data;
- holds no 'sensitive personal data';
- holds no personal data concerning children;
- does not share personal data it may hold with any other organisation;
- is not a public authority, does not carry out regular and systematic monitoring of individuals on a large scale and does not carry out large scale processing of special categories of data, such as health records or records of criminal convictions. As such, there is no requirement for FoAM to formally designate a Data Protection Officer.

Data Held, its Use and Protection

- The personal data held by FoAM is very limited and is primarily a list of Members' names, addresses, email addresses and phone numbers.
- The data is used by the Group to contact members concerning membership renewal and to send newsletters and information about events and other activities to members.
- The data is held by the Membership Secretary, who has responsibility for its protection.

Informed Consent to Personal Data Use

There is no requirement to automatically refresh existing consents. However, to ensure that consent for personal data to be used for the above purposes is freely given, specific, informed and unambiguous, the Membership Application Form and Membership Renewal reminder will, from the date of this policy, contain a positive 'opt-in', rather than inferred consent. The Application Form and Renewal reminder will make clear that consent can be withdrawn by sending a request to the Membership Secretary.

Members who do not renew membership, will have their data removed from the Membership list no later than one year following failure to renew.

Privacy Notice

A Privacy Notice which sets out details of what personal data is held, how it is used and how it is controlled, will be issued to all members.

Data Breach

The limited nature of personal data held by FoAM means a data breach is unlikely to result in a risk to the rights and freedoms of individuals eg it is unlikely to result in discrimination, reputation damage, financial loss, loss of confidentiality or any other significant economic or social disadvantage. As a result, it is not envisaged that FoAM will have to report any data breach to the Information Commissioner's Office (ICO).