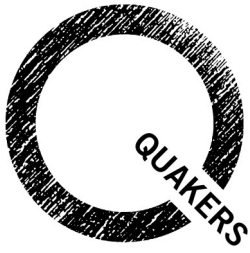


**THE RELIGIOUS SOCIETY OF FRIENDS
(Quakers) IN BRITAIN**

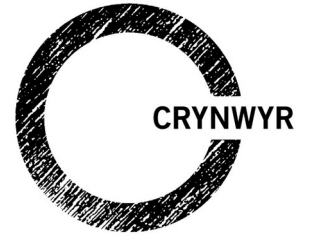


**THE SOUTHERN MARCHES AREA QUAKER MEETING
CYFARFOD CRYNWYR RHANBARTH Y GORORAU DEHEUOL**

Address: 2 Llangenny Lane, Crickhowell NP9 1AN

Email address: amcorrespondence@smquakers.org.uk

Registered charity number: 1134528



The object of Southern Marches Area Quaker Meeting is the furtherance of the general religious and charitable purposes of the Religious Society of Friends (Quakers) in Britain in the area of Southern Marches Area Quaker Meeting and beyond.

DATA PROTECTION POLICY

Date Agreed by Area Meeting Trustees 25 March 2018

Accepted by Area Meeting 12 May 2018 Minute AM/43

Date for Review May 2021

Southern Marches Area Quaker Meeting (SMAQM) is committed to protecting all information, both in digital format and written, that we handle about Friends, and to respecting people's rights around how their information is handled. This policy explains our responsibilities and how we will meet them. (There is a Glossary of Terms at the end of this document.)

1. Policy statement

1. **SMAQM** is committed to protecting personal data and respecting the rights of our data subjects; the people whose personal data we collect and use. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and adopting good practice.

We process personal data to help us:

- a) maintain our list of Members and regular attenders;
- b) provide pastoral support for members and others connected with us;
- c) safeguard children, young people and adults at risk;
- d) recruit, support and manage staff;
- e) maintain our accounts and records; this includes the processing of donations and the reclaiming of Gift Aid.
- f) respond effectively to enquirers and handle any complaints.

2. This policy has been approved by the **SMAQM** Trustees who are responsible for ensuring that we comply with all our legal obligations. It sets out the rules that apply whenever we obtain, store or use personal data.

2. **Why this policy is important**

- 2.1. We are committed to protecting personal data from being misused, getting into the wrong hands as a result of poor security or being shared carelessly, or being inaccurate, as we are aware that people can be upset or harmed if any of these things happen.
- 2.2. This policy sets out the measures we are committed to taking as an organisation and what each of us will do to ensure we comply with the relevant legislation.
- 2.3. In particular, we will make sure that all personal data is:
- a) processed lawfully, fairly and in a transparent manner;
 - b) processed for specified, explicit and legitimate purposes and not in a manner that is incompatible with those purposes;
 - c) adequate, relevant and limited to what is necessary for the purposes for which it is being processed;
 - d) accurate and up to date;
 - e) not kept longer than necessary for the purposes for which it is being processed;
 - f) processed in a secure manner, by using appropriate technical and organisational means;
 - g) processed in keeping with the rights of data subjects regarding their personal data.

3. **How this policy applies to you & what you need to know**

- 3.1. Before you collect or handle any personal data as part of your work for **SMAQM**, it is important that you take the time to read this policy carefully and understand what is required of you, as well as the organisation's responsibilities when we process data..
- 3.2. Our procedures will be in line with the requirements of this policy, but if you are unsure about whether anything you plan to do, or are currently doing, might breach this policy you must first speak to the Data Protection Officer

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- 3.3. Our Data Protection Officer is responsible for advising **SMAQM** and its Members about their legal obligations under data protection law, monitoring compliance with data protection law, dealing with data security breaches and with the development of this policy.

Any questions about this policy or any concerns that the policy has not been followed should be referred to them- the details of the Data Protection Officer are in the current **List of Friends**.

- 3.4. As a **Data Subject** of **SMAQM** we will handle your personal information in line with this policy.
- 3.5. As a Member or Attender processing personal information on behalf of **SMAQM**, you are required to comply with this policy. If you think that you have accidentally breached the policy it is important that you contact our Data Protection Officer (as listed in the current **List of Friends**) immediately so that we can take swift action to try and limit the impact of the breach
- 3.6. As a Clerk of a Local Meeting you are required to make sure that any procedures that involve personal data, that you are responsible for in your Meeting, follow the rules set out in this Data Protection Policy.

4. **Training and guidance**

- 4.1. We will provide general training as required to raise awareness of our obligations and responsibilities, as well as to outline the law.
- 4.2. We may also issue procedures, guidance or instructions from time to time.

5. **What personal information do we process?**

- 5.1. We collect and process information (personal data) about Members and regular Attenders. This data is collected from forms completed by Members and Attenders in December of 2017 and by new Members and Attenders when they first request to be included in the **List of Friends**. Information is also processed by the Membership Clerk from forms relating to the transfer of Membership from an Area Meeting into or out of **SMAQM**.
- 5.2. When Friends apply for Membership and report is made by the visitors appointed by the Area Meeting. This report is presented to the gathered Area Meeting and it then at

- 5.3. tached to the Minutes and stored securely. When the report has been accepted the visitors are required to destroy any copies.
- 5.4. We collect information relating to Disclosure and Barring Service (DBS) checks relating to those working with Young Friends. We will not hold information relating to criminal proceedings or offences or allegations of offences unless there is an overarching safeguarding requirement to process this data for the protection of children and adults who may be put at risk in our Meetings. This processing will only ever be carried out on advice from the Area Meeting Safeguarding Team. Issues involving Safeguarding matters will take precedence over Data Protection guidelines.
- 5.5. The Trustees of **SMAQM** will apply this Data Policy to all information gathered in the process of assessing candidates for any role as an employee of **SMAQM** and will delete all data acquired when no longer relevant.
- 5.6. Other data may also be considered 'sensitive' such as bank details, but will not be subject to the same legal protection as the types of data listed above.

6. Making sure processing is fair and lawful

- 6.1. Processing of personal data will only be fair and lawful when the purpose for the processing meets a legal basis, as listed below, and when the processing is transparent. This means we will provide people with an explanation of how and why we process their personal data at the point we collect data from them, as well as when we collect data about them from other sources.
- 6.2. Processing of personal data is only lawful if at least one of these legal conditions, as listed in Article 6 of the General Data Protection Regulation **GDPR**, is met:
- a) the processing is necessary for a contract with the data subject;
 - b) the processing is necessary for us to comply with a legal obligation;
 - c) the processing is necessary for the protection of children and adults;
 - d) the processing is necessary for legitimate interests pursued by **SMAQM** unless these are overridden by the interests, rights and freedoms of the data subject.
 - e) If none of the other legal conditions apply, the processing will only be lawful if the **data subject** has given their clear **consent**.
- 6.3. If personal data is collected directly from the individual, we will inform them in writing about our identity, contact details and those of the Data Protection Officer, the reasons for processing, how long the data will be stored and the data subjects' rights. This information is commonly referred to as a 'Privacy Notice' and this information will be given at the time when the personal data is collected.

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7. When we need consent to process data

Where none of the other legal conditions apply to the processing, and we are required to get consent from the data subject, we will clearly set out what we are asking consent for, including why we are

7.1. collecting the data and how we plan to use it. Consent will be specific to each process we are requesting consent for and we will only ask for consent when the data subject has a real choice whether or not to provide us with their data. **As an example, consent must be acquired before individual Friends are added to any email circulation list and be removed when asked to do so.**

7.2. Consent can however be withdrawn at any time and if withdrawn, the processing will stop. **Data Subjects** will be informed of their right to withdraw consent and it will be as easy to withdraw consent as it is to give consent.

8. Data will be adequate, relevant, accurate and not excessive

8.1. We will only collect and use personal data that is needed for the specific purposes described above (which will normally be explained to the data subjects in privacy notices). We will not collect more than is needed to achieve those purposes. We will not collect any personal data “just in case” we want to process it later.

8.2. We will make sure that personal data held is accurate and, where appropriate, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on.

9. Keeping data, amending and destroying it

9.1. We will not keep personal data longer than is necessary for the purposes for which it was collected.

9.2. Information collected by the Data Consent Forms, completed by Friends in December 2017 will be retained until we are requested to amend or delete by the Friend concerned. Requests to amend or delete the information relating to email information should be made to the List Editor, as detailed in the current List of Friends. Requests to amend or delete other information should be made to the Membership Clerk, as detailed in the current List of Friends. The Data Protection Officer will ensure that these requests are carried out.

9.3. The Data Protection Officer will keep records of all requests to amend or delete data.

10. Security of personal data

- 10.1.** We will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage.
- 10.2.** We will implement security measures which provide a level of security which is appropriate to the risks involved in the processing. Measures will include technical and organisational security measures.
- A. The Data Consent Forms will be held securely by the Membership Clerk and only used for the specific purpose they were collected for.
 - B. The List Editor will use the data from the Data Consent forms for the purpose of updating the annual List of Friends and for maintaining the list of personal email addresses. The email addresses will be uploaded to the mail server which has a security certificate and is password protected - the user name and password known only to the Data Protection Officer and the Domain Registration holder. The compiled **List of Friends** will be sent securely to the printer when required and then all relevant data files will be stored on a detached Hard Drive or USB pen drive, with no external access.
 - C. Data relating to DBS checks will be retained in secure storage by the Safeguarding Team.
 - D. Friends in possession of the **List of Friends** will be reminded, via written guidance in the List and also by reminders via the Area Meeting Clerk, of the duties and responsibilities of holding and using the List of Friends.
 - E. The effectiveness of these security measures will be checked on a regular basis. The Data Protection Officer will, on an annual basis, contact the all the relevant Role Holders in the Area Meeting and all Local Meeting Clerks to remind them of their duties under the General Data Protection Regulation and to confirm that they are in compliance. This will form the basis of an annual report to both the Trustees and to the Area Meeting. The LM Clerks will also be required to remind their Meetings of the individual's responsibilities under this Data Protection Policy on an annual basis.

11. Dealing with data protection breaches

- 11.1.** Where Friends think that this policy has not been followed, or data might have been breached or lost, this must be reported immediately to the Data Protection Officer.
- 11.2.** We will keep records of personal data breaches, even if we do not report them to the Information Commissioners Office (**ICO**).

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11.3. We will report all data breaches which are likely to result in a risk to any person, to the **ICO**. Reports will be made to the **ICO** within 72 hours from when someone becomes aware of the breach.

11.4. In situations where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the **ICO**), inform data subjects whose information is affected, without undue delay. This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

This policy was accepted by the Trustees of SMAQM on 25th March 2018

_____ Clerk to the Trustees

Accepted by Southern Marches Area Quaker Meeting on 12 May 2018 (AM 18/43)

_____ Clerk to Area Meeting

Glossary of Terms:

Data Subject - the individual who is named in the data in question.

List of Friends - the booklet produced annually listing the Area Meeting Role Holders and details of all Members and Attenders at each Local Meeting.

GDPR - The **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU).

ICO - The Information Commissioner's Office in the United Kingdom, is a non-departmental public body which reports directly to Parliament and is sponsored by the Department for Digital, Culture, Media and Sport (DCMS).

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