

# Data Protection and Privacy Policy

February 2021



## Data Protection, Confidentiality and Privacy Policy

### Who is this for and what does it apply to?

This policy provides for good management of personal data in Teams and also in compliance with the Data Protection Act 2018 and GDPR. Data Protection (DP) regulations were updated in May 2018 to be consistent with European legislation known as the General Data Protection Regulation (GDPR). Data Protection regulation applies to all organisations that hold any information that identifies living people.

In Teams, Data Protection applies to all membership information held by any person with responsibility whether at a Team, Sector, Region or other level. It applies to information gathered from the website including cookies, submission from webforms. It applies to information gathered for all events organised by regions or sectors. It does not apply to incidental naming of people in, for example, minutes of meetings or action lists.

### Policy application

The policy will apply, after agreement of the Trustees to the processing of all data by persons in the Province of Great Britain. All people with responsibility will be asked to commit to observing this policy.

### Formal Contact

Teams of our Lady - Great Britain is the Data Controller. The formal contact is: The Treasurer

TeamsGB processes personal data using paper and digital systems. It works with partner data processors including Google, Microsoft, MailChimp and Dropbox. TeamsGB has determined that the partner organisation data processing on its behalf is compliant with GDPR as far as it can assess.

### The Legal Basis of our Data Processing

TeamsGB is an unincorporated religious charity. Its members are married couples, widows, priests and religious. TeamsGB may also process data of helpers and benefactors.

To achieve the purposes of the charity we process data **for our legitimate interests**. This includes processing for the purposes of:

- Administration of the membership
- Governance
- Safety and safeguarding
- Fundraising and Public /Community Liaison
- Statistical reporting to the worldwide movement

It also includes processing by holding paper and electronic records, processing with the facilities of our data processing partners and sending communications by paper and electronic means.

We process data **for legal reasons**. This includes for the purposes of:

Compliance with charity law

- maintaining accounting records as required by HMRC and charity regulation

We process data by reason of **data subjects' consent**. This includes for the purposes of:

- Providing information to members
- Providing communications relevant to governance, administration and fundraising

## **Special Categories of Personal Data**

While Teams is a religious organisation, there is no specific reason to process data about members religion; however membership itself infers a religious affiliation.

Information about criminal records will be processed only when necessary for compliance with safeguarding policy for specific events to inform recruitment decisions for carers but will not be kept. (disclosure of all criminal convictions and cautions and the provision of an enhanced certificate from the Disclosure and Barring Service is required for all adults in relevant childcare roles, this being in compliance with the relevant legislation about filtering and rehabilitation of offenders. If and when this is required the data on convictions would not be held on file, only the decision to recruit or not and who were members of the recruitment group.)

The personal data of members and adult helpers we process will include full name and contact details. Relevant records will be kept for the management of Safety, Safeguarding and Personnel.

Website information will be kept for the effective management of the website and statistical purposes.

Financial information about bank accounts, payment of membership and activity fees, donations, the processing of gift aid and the maintenance of records is processed as required by regulations.

## **Sharing of Personal Data**

It would be shared to comply with legal requirements when necessary or to others when we have consent.

It would be shared with medical services to protect vital interests

It would be shared when relevant to the good administration of the charity and security of our processes.

It will be processed by partner data processors including cloud-based services for the good administration of the TeamsGB and achievement of its charitable purposes.

Personal data may be transferred outside the UK and European Economic Area (EEA) through the use of cloud computing systems. The use of these systems has been considered for their data security compliance; their use is approved by the Trustees.

## **Confidentiality**

Teams GB is a dispersed organisation with nearly 1,000 members in over 100 teams across GB. People in each team take responsibility for liaison with the wider organisation and may have access to personal information. All persons with responsibility and access to personal data are required to maintain complete confidentiality of the data.

## **Use of Images**

The possibility of taking of images (photographs or video) at events will be notified to attendees on arrival or in advance if that is possible. Use of such images of adults or children in literature, website or other media will only be used with the person's permission. Parents will be asked for permission for children – anyone under 18 years of age.

## Subject Access

Any person, who is the subject of personal data held by TeamsGB, may make a subject access request by contacting the Treasurer. The request will be processed in accordance with current regulation.

## Not Registered with ICO

TeamsGB is not registered with the Information Commissioners Office (ICO) as it only processes members information for the good administration of its membership.

## Rights under Data Protection Regulation

People's (Data Subjects) rights are as follows:

- **To be informed** about how personal data is processed: this Data Protection and Privacy Policy seeks to provide that information
- **To have personal data corrected** TeamsGB requests all members to notify any changes and will update information without delay.
- **To object to processing:** TeamsGB will comply with all requests as far as possible, some records are maintained for the formal administration of the charity, for safety and for safeguarding purposes when retention of records will be required.
- **To restrict processing:** TeamsGB will comply with all requests as far as possible,
- **To have personal data erased:** TeamsGB will comply with all requests as far as possible.
- **To request access:** TeamsGB will comply with current regulations
- **To move, copy or transfer** personal data: TeamsGB will comply with requests as far as possible.

## Questions about Data Protection or the use of Personal Data

Any questions or comments about data protection or this policy, notwithstanding personal rights above, should be addressed to the Treasurer.

## Data Breaches

Any loss of personal data, as described in the legislation, must be reported to the Treasurer including:

- Data being accessed by unauthorised person(s) either in TeamsGB or externally,
- Data or records being lost (or found)
- Systems failing their security including IT and hard copy files

The Treasurer will consider the seriousness of the data breach and if necessary report the matter to the ICO. The record of every Data Breach and the actions taken will be recorded in the DP Breach log. TeamsGB will cooperate with the ICO with all haste to respond to any matters.

The matter will be investigated and if possible, the root cause of the breach will be determined. Corrective action will be taken.

When people are affected by the data breach, this will be reported to them without delay so that they may take appropriate action. Breaches will be reported as a matter of routine to the Trustees.

## **Subject Access Requests**

Every person whose record is held by TeamsGB is entitled to a copy of their data. A Subject Access Request (SAR) should be sent to the Treasurer. It should be recognised that data processed is limited to membership and training records. The Treasurer will acknowledge the application and respond within the required time.

## **Administrative Procedures**

The personal data must not be shared outside TeamsGB without specific authorisation of the Trustees.

Personnel may process data on their home PC providing it is secure from possible unauthorised access. PCs must be protected by firewall and internet security. Data will only be placed on portable devices if the device maintains security by password.

When a PC or any other electronic device on which data is physically stored is disposed of then the data on the hard drive must be properly and fully erased or destroyed, not just deleted.

Paper based files used at home must be kept secure. If files are transported then the data security risk must be managed.

## **Directory**

The compilation of any local directory must have the approval of the Regional Couple. Members must give permission for inclusion and recipients must hold the directory as a confidential document with appropriate security. Paper copies must be marked requiring confidentiality and secure disposal. The directory must be kept up-to-date by a named person.

## **Retention of records**

Records will be retained for the good administration of TeamsGB as follows:

- For governance matters - **indefinitely**
- Attendance records for safeguarding purposes – **indefinitely**
- Membership, involvement and training records - **during membership**
- For financial accounting purposes - **6 years after the relevant year.**

## **Consent to mailings - unsubscribe**

Bulk electronic-mailings will be sent for notification of events, administration and governance. Anyone who wishes not to receive such mailings, providing it is not a duty, will be unsubscribed by replying as such to the email.

## **Use of Material by Teams**

Teams may use images, video, text, music or other work that could be subject to copyright or restricted use. Those responsible for developing material for websites, communication, gatherings or other events will ensure that they have checked, before use, that the use of all material is compliant with ownership and copyright rules.

**Communication of this Policy**

This policy is placed on the website, advertised in e-communications and discussed at 'Formation for Responsibility' meetings.

**Review of this Policy**

This policy will be reviewed periodically as any changes in regulations or best practice occur; this will be at least every 3 years.

**Agreed**

This policy was agreed by the Trustees on ..... 2021

Signed: .....Chairperson      Date: .....

Version 1.0



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## Appendix 1

### **Data Protection and Confidentiality Agreement**

All persons with access to personal data in TeamsGB are required to read the policy and confirm that they understand it and will comply with it. In the case of any doubt they must obtain advice from the Trustees.

This duty is maintained even when a member leaves Teams; else they may be subject to legal consequences.

## Appendix 2

### **Summary Data Protection and Privacy Statement**

TeamsGB is committed to compliance with UK Data Protection regulations and best practice in how it meets its duties. All members with responsibility and access to personal data are required to adhere to this policy.

TeamsGB is an unincorporated religious charity that supports and enables couples to develop their married spirituality. Personal information of members, helpers and donors is processed. TeamsGB is the data controller and the contact is the Treasurer.

The legal basis of this processing is **for our legitimate interests**, including administration of the membership, governance, safety and safeguarding, fundraising and public relations. We process data **for legal reasons** including maintaining safety and safeguarding records in compliance with regulations, and maintaining accounting records as required by authorities. We process data by reason of **data subjects' consent** including about providing information to members, providing communications relevant to governance, administration and fundraising and statistical reporting.

On the TeamsGB website, cookies and logging of IP addresses is used for statistical and web security purposes.

Personal information is only used and shared internally and, externally, as required by law. Personal data is retained as required for the good administration of TeamsGB and as required by law. Members' data may not be completely erased from the TeamsGB records for reasons of legitimate interest, including safeguarding.

Data subjects may make a subject access request by contacting the Treasurer. Data Subjects have rights in accordance with the UK data protection GDPR regulations. The full TeamsGB Data Protection, Confidentiality and Privacy policy is available on the website.

### **Brief Data Protection Statement for use in registration forms**

The personal data collected in this form is required for the administration of the event/ booking/ registration. The data will be kept securely. It will never be shared with any outside organisation.

## Appendix 3

### **Website Privacy Statement**

This website uses cookies and IP logging for statistical and security purposes. Data sent in webforms is used only for the declared purpose and will not be shared with any other organisation