

The Friends of Tewkesbury Abbey

Data Protection Policy

Purpose

As a member organisation The Friends of Tewkesbury Abbey ('The Friends') holds personal contact details and some financial information (e.g. Gift Aid or standing order) about its members. This policy sets out how The Friends will store and process this data to ensure compliance with Data Protection legislation. The most recent legislation is the General Data Protection Regulations which came into force on 25th May 2018. Data Protection regulations apply to all living persons.

Data Held

The Friends requests and holds the following data about its members:

- Name and title, with additional identifiers when provided (e.g. an unused initial, OBE, DL)
- Postal address
- Telephone number(s)
- Email address
- Connection to other member(s) e.g. spouse
- Role in a connected organisation e.g. PCC member, officer role, diocesan position
- Financial information may be held where this is used for the collection of subscriptions or to comply with HMRC requirements for Gift Aid declaration

Members are requested to keep The Friends updated with changes to any of the data held. This is prompted at the annual mailing in May each year, and via the occasional newsletters. All bulk e-mailings include a link for the member to update their contact details if required.

Data is held for former members only when this is required for an adequate history of the organisation to be maintained, or where there is a legal requirement (for example HMRC rules for Gift Aid donations).

Data Storage

Hard copies of data (e.g. a completed application form) are held securely by either the Administrator or the Treasurer at their home address.

Electronic data is held in the following ways:

- Internet server database software – this holds all data for all members on online secure servers within the cloud hosting arrangement. Access is limited to the Administrator, the Chair, the Vice-Chair, the Treasurer and the Young Friends Coordinator. Access logs are provided within the software. The Privacy Policies and Terms of Service for the webhost, content management system and database software, including server locations, are checked annually by the Administrator (or when an update is released) to ensure that they remain compliant with UK legislation. The data is backed up daily by the webhost and at least monthly using third party software.
- 'Mailchimp' – this holds basic contact information for all members who provide an email address and is accessed by the Administrator and the Young Friends Coordinator. No financial or connection information is held on this database. The Privacy Policy and Terms of Service are checked annually by the Administrator (or when an update is released) to ensure compliance with UK legislation.
- Personal computer systems of the Officers and Council Members of The Friends – communication between Officers and Council Members will necessitate simple contact databases to be maintained. It is the responsibility of the Officer or Council Member to ensure that this information is not accessed, used or made available to any third party individual or organisation.

Methods for Requesting Contact Information

The membership application form includes a specific request to assent to communication from The Friends by post, email, telephone or SMS message. The member is asked to tick the agreed methods, and to sign and date the form. The database records this information as a data field held within each record. Officers of the Friends refer to these tags in determining how a communication will be sent to a member.

All Mailchimp emails include the option to unsubscribe from the emailing list or to update communication preferences.

At the introduction of the GDPR changes in May 2018 the annual mailing requested explicit communication consent from all existing members. Electronic records were updated with the results of each return, and a record held of all for whom this information has not been provided.

Data Use

The Friends will only use Members' data in accordance with the stated purposes and objects of the Charity. Data will not be shared or made available to any Third Party. Where data sharing would facilitate the stated purposes and objects, permission will be sought in advance of any action.

Privacy Statements and Policy

The Friends agreed a Data Protection Privacy Statement in April 2018 and a Privacy Policy was drafted in July 2018 and approved by the Council in September 2018. The Privacy Policy was last reviewed and updated in September 2022. The Data Protection Privacy Statement is displayed on each email sent, at the foot of every page on The Friends' website, and is included in the Annual Report and Newsletters which are distributed in printed form. The Privacy Policy is a page on The Friends' website accessed via the site's menus.

Data Protection Requests from Members

The Privacy Statement, Privacy Policy and this Data Protection Policy may be requested by any member and will be sent by the Administrator in either electronic or paper format.

Any member may request a copy of all the data held about themselves. Requests should be addressed to the Administrator via post or email. No third party requests are permitted, including requests on behalf of a spouse etc, unless active Power of Attorney is provided. The Administrator will gather this information (from electronic sources, hard copy and by request to the Council members) and provide the data within one calendar month of receipt of the request.

Data Breaches

Should a data breach be notified or discovered, the Administrator and Chair will take whatever action is required to secure the data against further potential loss. A general notification may be made via the website as to the nature of the breach. Where particular individuals can be identified as having been subject to the breach, individual contact will be made to personally advise them of this.

This policy is dated: 22nd September 2018 Last Review: 10th September 2022

Signed: GRAHAM FINCH, CHAIR OF THE FRIENDS OF TEWKESBURY ABBEY, 10.09.22

This policy will be reviewed annually by the Chair and Administrator of The Friends.