

# GENERAL SERVICE BOARD OF ALCOHOLICS ANONYMOUS (GREAT BRITAIN) LIMITED DATA PROTECTION POLICY – UPDATED MAY 2018

## Aims of this Policy

The General Service Board of Alcoholics Anonymous (Great Britain) Limited is committed to protecting the privacy and security of its staff, trustees and members personal information.

We need to keep certain information on its employees, trustees and members to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt in accordance with the General Data Protection Regulation (GDPR). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation, including how we collect and use personal information about you during and after your relationship with us.

By following good practice we can protect staff, members and trustees as well as protecting the charity as a whole.

This policy covers employed staff, trustees and sub-committee members.

## Definitions

In line with the General Data Protection Regulation (GDPR) principles, The General Service Board of Alcoholics Anonymous (Great Britain) Limited will ensure that personal data will:

- Be obtained fairly and lawfully and in a transparent way
- Collected only for valid purposes that are clearly explained and not used in any way that is incompatible with those purposes
- Relevant to the purposes collected for and limited only to those purposes
- Be accurate and kept up to date
- Kept only as long as necessary for the purposes it was collected for
- Kept securely

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.

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- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

### **Type of information processed**

The General Service Board of Alcoholics Anonymous (Great Britain) Limited processes the following personal information:

#### **Fellowship members' personal data**

- Names
- Email addresses
- Addresses
- Telephone numbers
- Copies of identification documents (trustees only)
- Date of birth (trustees and sub-committee members only)
- CVs (trustees and sub-committee members only)
- Bank details (trustees and sub-committee members only)

#### **Employees' personal data**

- Names
- Email addresses
- Addresses
- Telephone numbers
- Date of birth
- Copies of identification documents
- CVs
- Bank details
- Emergency contact details

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**Professional Contacts' personal data**

- Names
- Job Titles
- Email addresses
- Addresses
- Telephone numbers

Personal data is kept in the following forms:

**Electronic** – emails/computer files/telephone speed dial

**Paper** – letters/forms/business cards/minutes/meeting reports/directories

Groups of people within the organisation who will process personal information are:

- Employed staff
- Trustees
- Sub-committee members

**Responsibilities**

Under the General Data Protection Regulation, overall responsibility for personal data in a voluntary organisation rests with the governing body. In the case of the General Service Board of Alcoholics Anonymous (Great Britain) Limited this is the Board of Trustees.

All employed staff and trustees who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy may result in disciplinary proceedings.

**Policy Implementation**

To meet these responsibilities our employed staff, trustees and sub-committee members will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

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We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, trustee or sub-committee member, knows what to do;
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely.

**Training**

Training and awareness raising about the General Data Protection Regulation (GDPR) and how it is followed in this organisation will take the following forms:

**On induction:** a copy of this policy will be issued

**General training/ awareness raising:** all staff, trustees and sub-committee members will receive a copy of this policy and any updates as required. Ongoing training will be given as necessary.

**Gathering and checking information**

Before personal information is collected, we must ensure that we only request the minimum information to fulfil the task required.

We will inform people whose information is gathered how we intend to use their personal data.

To ensure that personal information kept is accurate anyone submitting it should be made aware how they can update and changes or request their data removed from our records.

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

**Retention periods**

The General Service Board of Alcoholics Anonymous (Great Britain) Limited will ensure that information is kept according to the following retention periods guidelines:

<b>GOVERNANCE</b>	
Board minutes	Archived
Sub-committee minutes	Archived
Annual Reports	Archived
Conference Reports	Archived

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European Service Meeting Reports	Archived
Trustee details	Archived
Trustee applications	Successful – until rotate Unsuccessful - deleted
Charity Annual Returns	Archived
General correspondence	Six months unless ongoing query/legal
<b>FELLOWSHIP</b>	
Group records	Archived
Group contacts	Archived
Intergroup records	Archived
Region records	Archived
European Service Meeting delegate records	Archived
Conference delegate records	Archived
Prison Postal Service details	Until stop using service
12 <sup>th</sup> Step list details	Until stop using service
Packing volunteers details	Until stop volunteering
Share Recorder details	Until stop volunteering
Telephone volunteers – Southern Service Office	Until stop volunteering
Patient details for hospital volunteers – Northern Service Office	Anonymised once volunteers in contact
Archives	Archived
Correspondence (email/mail)	1 year unless ongoing query/legal
Sub-committee member details	Archived
Sub-committee applications	Successful – Archived Unsuccessful - deleted
<b>STAFF</b>	
Contact details (+emergency contacts)	Archived
CVs	Successful – archived Unsuccessful - deleted
References	Archived
Appraisals	Archived
General correspondence	Archived
Contracts	Archived
Diary	Archived
Accident book	Archives

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<b>FINANCE</b>	
Bank details (staff/sub-committees/trustees/suppliers)	7 years (legal)
Supplier details	Archived
Gift Aid	7 years (legal)
Order details (mail/online)	3 years (legal)
Share subscribers	7 years (legal)
Roundabout subscribers	7 years (legal)
Annual accounts	7 years (legal)
Contributions – Groups/Intergroups/Regions/Personal/Conventions	7 years (legal)
Estate Legacies	7 years (legal)
In memoriam payments	7 years (legal)
<b>OTHER</b>	
Parliamentary event attendees list	2 years
Professional contacts	Until no longer used
Visitors Book	Archived
<p><b>Data Security</b></p> <p>The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:</p> <p><b>Physical Security</b></p> <ul style="list-style-type: none"> <li>• Premises are secured and accessed with pass cards</li> <li>• Alarms are installed in all offices as well as CCTV</li> <li>• All visitors are required to sign in</li> </ul> <p><b>Data Security</b></p> <ul style="list-style-type: none"> <li>• All staff and trustee emails are encrypted</li> <li>• All office laptops are encrypted</li> <li>• All office portable data sources are encrypted</li> <li>• Internet access for staff is through a secure service. Visitors access the internet through a separate service.</li> <li>• Any data transmitted by the office is encrypted</li> <li>• All office computers are secured with passwords and auto lock after one minute when unattended</li> <li>• Office desktop computers are connected to a closed network</li> <li>• Backup of office data is made through a secure encrypted server</li> <li>• All office filing cabinets/cupboards containing data are locked when not in use</li> </ul>	

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- No data is to be removed from the office unless encrypted

Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary proceedings.

Any unauthorised disclosure of personal data to a third party by a member or trustee may result in disciplinary proceedings.

### **Procedure in case of a breach**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. For example sending personal information to an unintended addressee or theft/loss of a laptop containing personal data.

In the event of a personal data breach please complete the attached form and pass it to the Office Manager at the General Service Office.

### **Individual Rights**

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong. They can also request their data be transferred to another party.

Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to

Sophie Wright  
Office Manager  
General Service Office  
PO Box 1  
10 Toft Green  
York  
YO1 7NJ

sophieperring@gsogb.org.uk

We may also require proof of identity before access is granted.

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Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request.

**Review**

This policy will be reviewed yearly (or as necessary) to ensure it remains up to date and compliant with the law.

**If you have any questions about this policy please contact the Office Manager at the General Service Office.**

**Declaration**

I confirm I have read and understood the General Service Board of Alcoholics Anonymous (Great Britain) Limited's Data Protection Policy and will act in accordance with it.

I am connected with this organisation in my capacity as a

- Member of staff
- Trustee
- Sub-committee member

Signature:

Print name:

Date:

Please return this form to:

Sophie Wright  
Office Manager  
General Service Office  
PO Box 1  
10 Toft Green  
York  
YO1 7NJ