

## GDPR & Data Protection – A Guide for CLAPA Volunteers

This guide is not a legal document; it is a general overview of what you need to do to be compliant with CLAPA's new data protection policies. If you have questions about anything in this document, or about what you're allowed to do in a specific situation, please get in touch with your key contact at CLAPA, or CLAPA's Data Protection Lead (see end of document).

Please pay particular attention to the 'What This Means for You' section at the end of this document.

### **Definitions**

**GDPR:** General Data Protection Regulation, a new set of laws to replace the old Data Protection Act (1998). It focuses on what's best for individuals, so it puts much higher standards on the way organisations like CLAPA (and their volunteers!) can collect, store and use personal data.

**Confidential data includes:** anything labelled as or assumed to be confidential (such as notes on a Peer/Parent Support case), or information that people have a reasonable expectation of being kept private, such as personal disclosures.

**Sensitive data includes:** ethnic origin, political or other opinions, medical records, Parent/Peer Supporter records, information about under-18s, or broadly anything about someone's personal life.

**Personal data includes:** names, contact information, dates of birth, labelled photos, or any combination of the above that could identify an individual. This includes information which has been anonymised or uses a pseudonym if it's still relatively easy to link it to a specific individual.

**Data Breaches:** When personal, sensitive or confidential information is lost, stolen, used in a way that goes against our data protection policy, or in a way that violates an individual's rights under GDPR.

### **CLAPA's Data Protection Principles**

**As a volunteer, these apply to how we use your data and how you must use other people's.**

**Golden Rule:** We treat personal data like we'd want our own (or our children's) to be treated.

**Ethical:** We don't collect, store or use more information than we need, and we don't use people's information in ways they haven't agreed to.

**Transparent:** People should know what we're going to do with their information before they decide to hand it over; especially if we're doing something we think they might have a problem with, like sharing it with other people or tracking their activity. We'll help them make an informed choice.

**Fair:** We can't use someone's information for something they haven't explicitly agreed to. Just because they use our services doesn't mean they want to receive lots of marketing emails.

**Respectful:** When someone gives us their data, it's still theirs; we're just looking after it. They should be able to easily ask for it to be updated or removed, and to change their preferences at any time without explanation. They have a right to ask at any time for copies of every bit of information we have on them, including emails and messages concerning them, to make sure we're acting legally.

## **How CLAPA handles your data**

You are strongly encouraged to read our full **privacy policy** linked at the end of this document.

In brief, we collect and securely store any information you've given us (e.g. in an application form) which we need to provide you with a specific service you've asked for (e.g. attending an event), or to fulfil our obligations to you as a volunteer (e.g. making sure we don't contact you about volunteering if you've told us you need a break). Some information (e.g. from your web browser) is collected automatically, and we'll analyse this in bulk to improve our services, but unless you ask us to we won't use this to identify you personally.

We don't collect or store more than what we need, and respecting your privacy and the trust you place in us is always a top priority. We don't share your data with other organisations or individuals without your explicit consent, unless this is to provide a service you've asked for (like sharing your address with our mailing house if you've asked to receive CLAPA News), or if we have a legal or safeguarding obligation to do so.

## **What's changed?**

Your privacy has always been a priority for us, so we haven't had to change much about how we handle your data, but we have made our policies around this much clearer and more accessible.

In the past, we've assumed some people have consented to marketing emails (including e-newsletters and invitations to local events) when they signed up as volunteers or fundraisers, but this consent wasn't good enough under GDPR because we didn't explain this properly or give them enough control over this decision. That's why some of you have received emails asking you to 'opt-in' again.

After 25<sup>th</sup> May, over half of our e-mailing list will be removed because we don't think the way we signed these people up was good enough or gave them enough control. This is a good opportunity to make sure we're only getting in touch with people who really want to hear from us. If anyone isn't getting our emails and would like to, direct them to the 'CLAPA Community' button found at the top right of our website.

## **What This Means for You**

As volunteers, you have the same obligations as CLAPA staff when it comes to keeping personal and confidential data secure. These haven't changed much as a result of GDPR, but we want to take this opportunity to make them crystal clear. If you have questions or concerns about any of these, please get in touch with your key contact at CLAPA or the Data Protection Lead for clarification ASAP.

1. **If possible, let CLAPA staff handle any data on your behalf.** CLAPA staff are trained and have strict processes to follow, so if there's any way you can avoid accessing, collecting, storing or using personal data, please do. Contact us if you need support with this.
  - o **Note:** Some volunteers who have previously had access to Eventbrite will now be removed from CLAPA's account to reduce the risk of data breaches. Your key contact will be in touch about this if necessary.

2. **Stay secure.** If you need to hold and use personal information, ensure it is password protected, carefully anonymised, and/or only accessible by you. Keep your devices up to date and make sure you have adequate antivirus protection. Think about who might be able to overhear a private conversation, or see what's on your laptop screen.
3. **Don't record, store or use more personal data than you need for a specific purpose which someone has agreed to.** If you don't need to use full names, don't. If you can fulfil someone's request without taking all their details, do so. If someone gave their data for one particular reason, don't use it for a different reason.
  - Make sure you're only storing and using what they've offered you. Don't 'fill in the gaps' with things you've learned from their social media accounts or in private, unrelated conversations. Think about how you would feel if you found out someone was collecting, storing and/or using this kind of information without your consent.
  - Think about what would happen if you lost the data or sent it to the wrong person. Are you confident in explaining why you had it in the first place and what you were using it for? Could you justify your actions to an official investigator?
  - E.G. If you need a printed list of names for an event, don't include unnecessary information like addresses, or medical information like which attendees were born with a cleft. If the worst happens and you lose this list, you'll know you did what you could to minimise the impact for the people on the list.
4. **Never share information without explicit consent.** This includes with other volunteers.
  - If you're running an event, it's fine to share necessary information with the venue if you need to. People signing up to this event can reasonably expect you'll do this.
  - If in doubt – ask people! Make sure you explain exactly what you'll do and why, and let them make an informed decision.
  - There are exceptions if you have a safeguarding concern. Read our full Data Protection Policy (linked below) for more information.
5. **Under no circumstances should you send marketing emails on behalf of CLAPA.** Marketing emails include invitations to events, general newsletters, and anything else you might get if you're on a mailing list. We have strict policies and procedures in place around this, so please let our staff handle this side of things for you – we're happy to help!
  - E.G. If a family comes to one of your events and asks for more information, you can send a follow-up email about how to sign up to the CLAPA Community, but you can't just add them to a mailing list and keep sending them information indefinitely.
  - **Exception:** Social media, including CLAPA's Facebook Groups, are free from these restrictions. You may advertise events and opportunities on here as usual.
  - **Exception:** If it's very clear you are acting as an individual and not as part of CLAPA, you can send 'marketing' communications to other individuals and organisations, e.g. forwarding on an e-newsletter to an interested contact, or approaching a potential supporter and asking for help in your capacity as a volunteer.

6. **Delete or destroy any records you shouldn't still have.** We've asked volunteers in the past to make sure they're not holding on to old Branch databases, event attendee lists, confidential or sensitive emails they no longer need, or any other pieces of confidential, sensitive or personal information recorded in their capacity as a CLAPA Volunteer. If for whatever reason you still have these, now is the time to securely destroy or delete them (including from your Recycling bin, 'deleted items' email folder, or any equivalent). Please get in touch immediately if you need any support with this.
  
7. **Report any (real or suspected) data breaches to CLAPA immediately.** Even if you follow all the rules and take every precaution, bags or devices can still be stolen or lost, or your emails could be hacked. That's why it's vital to minimise the chances of a breach by keeping things secure, and minimise the impact by not keeping or using more data than you need to. If this ever happens, CLAPA needs to know right away so we can fulfil our legal obligations to report what's happened to both the government and the people affected.
  
8. **Report any concerns you have around CLAPA's collection, storage or use of data immediately.** We do everything we can to be transparent and treat people's data with the respect it deserves, because we want everyone in our community to feel confident in trusting us with your information. However, as one of our data subjects, you'll know best if we're succeeding. Please help us improve our policies and communications by letting us know if anything is unclear or gives you any cause for concern.

## **More Information**

**Privacy Policy:** <https://www.clapa.com/privacy/>

CLAPA's plain English privacy policy explains exactly what data we collect, store and use, and why. When people are prompted to give us any personal information (e.g. through a website form), important sections of this policy are highlighted to help them make an informed choice.

**Data Protection and Confidentiality Policy:** <https://www.clapa.com/wp-content/uploads/2018/05/Data-Protection-and-Confidentiality-Policy-JAN18.pdf>

Our formal Data Protection Policy is the basis for other related policies listed here. It explains how we fulfil our legal and ethical requirements to the people we hold information on. **Sections 7-12** concern the sharing of personal data.

**Subject Access Policy:** <https://www.clapa.com/privacy/subject-access-requests/>

The policy and process by which anyone can formally request a full copy of any and all data CLAPA holds on them.

## **Contact**

Talk to your key contact at CLAPA and/or the Data Protection Lead if you have any questions or concerns about how GDPR might impact your role as a volunteer, no matter how small.

The current **Data Protection Lead** at CLAPA is Anna Martindale. Contact Anna at [anna.martindale@clapa.com](mailto:anna.martindale@clapa.com) or call the office on 020 7833 4883.