



London West Area Meeting

Policy on Data Protection

Approved November 2022

1. Our policy is to treat personal data in accordance with the European Union ('EU') General Data Protection Regulation ('GDPR') and other relevant laws applied in a proportionate manner. It may be helpful for the following general principles to be set out. They are subject to any more detailed provisions of EU and UK law.
2. Clerks to Local Meetings are expected to be the data controllers for data relating to members and attenders worshipping at their Local Meetings. AM trustees expect them to comply with this policy. They should keep records which enable them to demonstrate that they comply with this policy and to explain the reasons for any departure from it.

Data protection principles

In relation to personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect personal data only for reasons that we find proper for the legitimate administration of the Area Meeting, volunteering, or the course of employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- keep it secure.

Criminal conviction data

We may only use information relating to criminal convictions where the law allows us to do so (such as for DBS checks). This will usually be where such processing is necessary to carry out our obligations.

Less commonly, we may use information relating to criminal convictions where it is necessary relating to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

London West Area Meeting

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We may also process such information about volunteers, employees, or former employees in the course of legitimate business activities with the appropriate safeguards.

We will only collect criminal conviction data where it is appropriate given the nature of any volunteering or employment role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your volunteering or employment. We use criminal conviction data to meet our legal obligation to undertake DBS checks for certain volunteering or employment jobs (those involving working with vulnerable adults or children), where required.

In most cases, we do not anticipate processing criminal conviction data about you.

3. It is important for clerks and other Quaker individuals and groups to have the means of communicating with members and regular attenders. For that reason, clerks need to keep personal data which makes possible the use of reliable means of communication. The keeping of that information regarding members is justified by GDPR Article 6 (1) (b) interpreted in a purposive way. The keeping of that information for regular attenders is justified only by express written consent under GDPR Article 6 (1) (a). Such consent must be given by parents or guardians in respect of those under 16. Other personal information may need to be kept to prevent the recurrence of crime, protect people's health or to respect the vulnerability of minors (Article 6(1) (c-e)).
4. Preferably LM clerks should have postal and electronic addresses and telephone contact numbers. It is usually helpful to have a cross-reference in lists of members and attenders to relationships with other members and attenders who have different surnames (e.g., To a life partner who goes by a different name).
5. It is good practice and our policy that both members and attenders should be asked to consent in writing to the keeping of personal data. They should be asked to consent to that information being shared with any Quaker individual or group that LM or AM clerks consider appropriate. LM Clerks should keep a hard copy register (signed by members and attenders) of such consents.
6. LM clerks should decide what information should be sought. Especial sensitivity is needed in respect of some matters such as sexual orientation. Individuals should decide what level of information is in fact to be included in such lists (e.g., re., life partners—in respect of which both partners need to give consent). The above registers should include any restrictions on the use of such information that

individuals wish. Such lists should be as simple as possible. Individuals are asked to exercise restraint in imposing such restrictions and remember that the basis of our Quaker life involves mutual trust.

7. LM and AM Clerks and others in possession of such personal information should not disclose it in breach of any such restrictions or to outside organisations, whether on payment or otherwise. They must take care to ensure that it is securely stored (for example locked).
8. LM and AM Clerks should inform anyone of any personal information appertaining to her which is kept. Clerks should be willing to correct or delete on request by any person any records of personal information appertaining to him. Clerks should respond to such requests promptly and in any event within one month.
9. LM clerks and others should be wary of deleting information which might be a useful historic record. The GDPR does not apply to those who are dead.
10. Where LM clerks or others are in doubt as to the requirements of the GDPR or other relevant law they should seek guidance from the Clerk to AM Trustees or from such person as the Clerk to AM Trustees identifies as appropriate.

Your rights in relation to your data

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- **the right to be informed.** This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- **the right of access.** You have the right to access the data that we hold on you. To do so, you should make a subject access request which you should address to the Data Privacy Officer (see below).
- **the right for any inaccuracies to be corrected.** If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- **the right to have the information deleted.** If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it

- **the right to restrict the processing of the data.** For example, if you believe the data, we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- **the right to portability.** You may transfer the data that we hold on you for your own purposes to another party.
- **the right to object to the inclusion of any information.** You have the right to object to the way we use your data where we are using it for our legitimate interests.

11. Making a complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO. If you have a concern or complaint, you are strongly encouraged to contact our Data Privacy Officer in the first instance.

12. Data Controller

Named as data controller rather than data protection officer, to distinguish this from the legal role of data protection officer. A small organisation would not need a data protection officer. The Data Controller could be one of the trustees.

The Area Meeting's Data Controller is Jane Dawson, Clerk of AM Trustees. She can be contacted on trustees@londonwestquakers.org.uk, the administrative tasks associated with this role, are undertaken by the Administrator, who can be contacted on office@londonwestquakers.org.uk.

13. This policy will be reviewed by AM Trustees from time to time as the development of the law and experience makes it appropriate and, in any event, each year at their first meeting after the start of Ninth Month.

Approved by London West AM

Quaker Trustees Minute 2022/63

14th November 2022