

CAAT's Data Protection Policy

June 2013

This document illustrates how CAAT collects, records, uses and protects personal data used by staff, volunteers and Steering Committee. It sets out the principles which we will apply when collecting and handling individuals' personal information, what we will do if someone asks for information kept about them, and if there is a breach of security.

This is mainly an internal document, but will be sent out to people if requested.

Why does CAAT have a data protection policy?

- To follow good practice, and be transparent and trustworthy
- To protect supporters, staff, volunteers and other individuals
- To protect the organisation

The types of information / data collected by CAAT includes:

- contact details from supporters;
- details of actions taken, and events attended, by supporters;
- supporters included in photos and/or video footage from CAAT events;
- bank details from supporter donations;
- details from applications for paid jobs or volunteering roles;
- staff employment records;
- details of general involvement with CAAT

CAAT's Data Protection Principles

Personal information should always be:

- obtained fairly and lawfully;
- processed for the purposes which have been specified or explained;
- adequate, relevant and not excessive for the purposes of the organisation;
- as accurate, and kept up to date, as possible;
- not kept for longer than purposes require;
- processed in accordance with the rights of data subjects;
- kept secure, and deleted or securely destroyed when it has served its purpose

CAAT also has a Privacy Statement which you can read at:

www.caat.org.uk/about/terms_and_conditions.php

Collecting Data

CAAT's primary purposes in capturing personal data is to keep our supporters and other interested parties informed about our work, to promote campaigns, actions and events, and to carry out fundraising activities to support our work. Personal information is collected by CAAT from filled out campaign resources and donation forms (both as hard copies and online), from conversations over the phone, emails, from attending CAAT events and from applications for roles within the organisation.

On all CAAT campaign materials, online actions and appeals where personal data is requested there should always be a fair processing statement or direction to the CAAT fair processing statement, saying why CAAT is asking for the data and what we plan to do with it. This can be read at: www.caat.org.uk/about/terms_and_conditions.php

We should also make it clear and easy for supporters to let us know if they'd like to be removed from our database records, or inform us of any changes to their details - and their

request should always be acted upon promptly.

From the public domain

On occasion CAAT may decide to collect information on prospective donors or supporters from resources that are publicly available. If this is the case then CAAT should always; first check the mailing preferences of that data; provide the fair processing statement (mentioned above) to the individual; and offer the option to opt out from any further communication.

Recording and using data

Staff and volunteers at CAAT that have access to any personal information should be explained the confidential nature of the personal data collected when they are given training in accessing and inputting it, and taught to comply with the obligations set out in this policy.

Database

CAAT's database is a hugely valuable asset that is depended upon for most of its fundraising and campaigning activities. It is kept up to date, with new information in-putted daily by both staff and volunteers. When CAAT records personal data, the date and source of the data should be included on the database where possible to justify how we use it and to ensure it is used correctly.

If a supporter wishes all or part of their details to be removed from the CAAT database (because they have either requested to be removed, moved or died) then CAAT has a procedure to follow so they can't accidentally be contacted again and the correct information is deleted, or kept for the right reasons. Please see this procedure below in appendix I. We keep their record of involvement (activities and donations) as this is useful historical information for CAAT.

Photos and Video footage

If CAAT wants to publicise a photo or video taken by a supporter we should ensure that the individual who has taken the picture or footage has consented to this, and credit them if requested.

When CAAT takes photos or video footage of supporters they should be given the opportunity of opting out of anything that shows them participating in publicity material or attending events. CAAT should do this by putting notices up at the event or including a statement in a briefing hand-out, telling people that they may appear in event publicity and can opt out if they wish. Parents or carers will need to opt out on behalf of children under the age of 14.
(examples of such a notice can be found in appendix II below).

Marketing using email, SMS and telephone

CAAT should never make cold calls to an individual to solicit a donation. All marketing should clearly state that it is from CAAT and provide CAAT's contact details. When phoning the caller must identify themselves as from CAAT and keep a list of anyone who opts out from such calls so they are not called again.

When sending any unsolicited email or text to potential supporters, not initiated by the recipient, then as a matter of best practice they should include clear instructions for unsubscribing from future emails or texts from CAAT.

Emails

- When sending emails to groups, one person's email address should not be visible to other recipients, unless all the group agrees to this.
- Campaign actions, where a supporter can forward the action by email to friends, should clearly state that CAAT does not collect any personal data unless that person opts in.

Protecting Data

CAAT has a number of security procedures for keeping and backing up data:

- All office computers and laptops are password protected;
- Personal data stored on computers when working from home are also password protected;
- The CAAT database is password protected with only authorised staff and volunteers given access to passwords;
- Passwords should not be easily guessed;
- When away from their desk staff and volunteers should ensure that monitors do not show confidential information;
- Cupboards holding hard copies of personal financial information are kept locked;
- Forms from supporters with credit card information on should be in-putted as soon as possible once they are received and then shredded immediately afterwards;
- Human Resources information that includes personal data are kept in an office safe;
- Personal data of unsuccessful job applicants should be deleted 6 months after the post has been filled;
- Personal data of unsuccessful volunteer applications should be deleted 18 months after initial enquiry (this is longer than paid positions because volunteer vacancies occur more often and we sometimes like to get back to people if we couldn't offer them a position first time round);
- Personal employment details of staff should be kept for up to 6 years after the end of their employment, and volunteer details are only kept for up to 3 years;
- The CAAT shared network files should be backed up onto a separate hard drive every weekday night;
- One back up drive is attached to the server, one is kept in the office safe and one is kept off-site at a member of staff's home;
- All back up drives are encrypted;
- All paper documents that contain personal data should be shredded when not needed any more;
- Personal data (usually relating to attendance at a CAAT event) should not be left on the laptop, or as a paper copy, without staff or volunteer supervision;
- Personal data is only transferred if absolutely necessary, and always in a secure manner. i.e. using registered post or a courier, secure online storage, or password protected or encrypted emails.
- CAAT does use external companies to help campaign, fundraise and carry out HR duties, including Paypal, Artezglobal, Rapidata and iParl. Selecting these companies is done on the provision of sufficient guarantee of their security measures used in relation to processing personal data.
- CAAT does not share supporter personal data with any other organisation.

Collecting supporter information:

by print and online

If a supporter asks to know more about how we process data and how to opt out they should be advised to call the office on 0207 281 0297, or copied or forwarded to our 'fair processing statement' at: www.caat.org.uk/about/terms_and_conditions.php

by telephone

If during a phone call, we capture a name and address to send out information we should inform the individual that CAAT would like to use their information to send them further information or communications in future, and ask if this is OK.

Requesting Information held by CAAT

Supporters, and those who've worked, or applied to work, for CAAT (otherwise known in this section as 'data subjects') have a right to access any personal information about them that CAAT holds, subject to certain exemptions. A Subject Access Request (SAR) can only be made by or on behalf of a data subject. A relative of a data subject does not have the right to see the personal data that CAAT holds about that person, unless they can demonstrate that they are acting on behalf of the data subject. All requests must be made in writing.

Once CAAT has decided to respond to a genuine SAR it should pass on a copy of the personal data it holds about the person making the request and any information it has about where the information came from (if this is relevant). CAAT should also include an outline of the reasons why it holds the information and details of who else is likely to see it.

There must be sufficient information in the request to properly identify the data subject and to enable CAAT to comply with the request. CAAT should only accept requests in writing and is entitled to ask for proof of identity. i.e. a copy of the person's passport or driving licence. If CAAT responds to a SAR it should do so within 40 days from when CAAT receives the proof of identity from the data subject.

CAAT is not obliged to comply with the request if doing so would also disclose information relating to another individual, unless that individual has consented.

Procedure for data security breaches

Although the Data Protection Act does not require CAAT to report data security breaches, it is best practice to report serious breaches to the Information Commissioner's Office (ICO). In making the decision as to whether a breach is serious the following should be considered:

- the potential harm to data subjects which could arise from the breach;
- the volume of personal data lost, released or corrupted;
- the sensitivity of the data lost, released or corrupted.

When a breach has occurred CAAT should also consider whether the individuals involved should be notified. Notification should be made where there is a clear purpose for doing so. For example if it will enable individuals who may be affected to protect themselves (i.e. by cancelling a credit card or changing a password).

APPENDIX I

CAAT procedure for removing supporter details

When designing any supporter database query, always exclude 'died', 'gone away' and 'asked to be taken off'. If the query is for a mailing exclude 'don't bug me' too.

Died

- Tick 'died' and change to 'Non-active'
- In Activity Table put "Notified of death" in Record of Contact list
- Delete email address and phone number from their record

No longer at that address (post returned to sender)

- Tick 'Gone Away' and change to 'Non-active'
- In Activity Table in Record of Contact list put one of the following as appropriate
 - * Not at this address: emailed to find out new address
 - * Not at this address, no email: phoned to find out new address
 - * Not at this address, no email, no phone

Asked to be removed from "mailing list" (where it is unclear whether or not they still want to receive email bulletin etc)

- Change to 'Annual' and tick 'Don't bug me'

If we don't have an email address:

- pass details to the Office Co-ordinator who will phone / write to them (depending on the circumstances) asking if they'd like to just receive our emails and nothing by post

If we have an email address:

pass details to the Office Co-ordinator who will email asking if they'd like to just receive our emails and nothing by post

If they respond to our follow-up, and want to receive emails, mark up their record to show this.

If after five weeks they haven't responded, or have asked to be totally removed, mark as 'Non-Active' and 'Asked to be taken off', remove all contact details, and, if they are down to get the Email bulletin, untick that too.

Specifically asked to be removed from our 'database'

- Mark as 'Non-Active' and 'Asked to be taken off', and, if they are down to get the Email bulletin, untick that too.
- Pass details to the Office Co-ordinator, who will contact them, politely asking why they've chosen to leave (if not already stated)
- If after five weeks they haven't responded, or have asked to be totally removed, the Office Co-ordinator will remove all contact details (address, phone and email) from their record.

When removing email addresses, if they are ticked as getting one of our email bulletins pass the email address to Henry to be deleted from our PHP list.

APPENDIX II

- *Notice of photos and/or video footage being taken:*

Campaign Against Arms Trade (LOGO)
Unit 4, 5-7 Wells Terrace, London N4 3JU

(EVENT NAME & ADDRESS)
(EVENT DATE)

Photography/Filming/Recording opt out notice

Campaign Against Arms Trade (CAAT) wishes to use creative materials for its campaigning and fundraising activities which may include images or recordings of you taken today.

If you would rather CAAT didn't use video, audio, photographic or other recordings featuring you please contact the person co-ordinating this event (xxxxxx xxxxx), or email campaign@caat.org.uk or call 0207 281 0297.

For your reassurance, CAAT has a data protection policy which applies to all individuals data / images / recordings used by CAAT - a copy of which can be found on our website or posted if you contact our office.

Thank you