

Griffins General Data Protection Regulation

The society acknowledges its responsibilities in complying with general data protection and specifically the GDPR (general data protection regulation) that comes into force on 25 May 2018.

What do we mean by privacy?

Privacy, in its broadest sense, is about the right of an individual to be let alone. It can take two main forms, and these can be subject to different types of intrusion:

- Physical privacy - the ability of a person to maintain their own physical space or solitude.
- Informational privacy – the ability of a person to control, edit, manage and delete information about themselves and to decide how and to what extent such information is communicated to others. Intrusion can come in the form of collection of excessive personal information, disclosure of personal information without consent and misuse of such information. It can include the collection of information through the surveillance or monitoring of how people act in public or private spaces and through the monitoring of communications whether by post, phone or online and extends to monitoring the records of senders and recipients as well as the content of messages

Consent (explicit consent for sensitive personal data) is one of the conditions the DPA provides to legitimise processing. The Data Protection Directive on which the UK's DPA is based defines 'the data subject's consent' as:

'any freely given specific and informed indication of his wishes by which the data subject signifies his agreement to personal data relating to him being processed'.

(From PIA – code of practice from the information commissioner)

It is not a legal requirement of the DPA (Data Protection Act) to carry out a PIA (Privacy Impact Assessment), but we have looked at the principles of assessing the activities of the society in deciding what actions we need to take to be compliant with the GDPR regulations (see end of document for the eight Principles re GDPR).

PIA – Privacy Impact Assessment:

Data the society collects:

The fellowship applications process:

Expressions of interest in Griffins Fellowships: the contact details (email, phone, postal) for any individual contacting the society directly expressing interest in becoming a fellow, will be held for the purpose of managing the society's applications process and for communicating about the activities of the society.

All e-mails sent from the society include an opt-out in the signature that allows the recipient to opt out from receiving any further communication from the society.

Fellowship Application form requires personal data to be recorded as part of the fellowship application process. A notice is included on the fellowship application form stating that completion and submission of the form implies permission being given to the society by the person applying, to hold their personal data recorded on the form for use by the society in the managing of its affairs.

A further distinct 'opt out' option with regard to being added to the society's general **Contacts database** (mailing list – see below) is also given at the bottom of the form.

Information shared with other organisations (third parties): personal information (in the form of applicant CVs) is shared with Griffins partners for purposes of the interviewing process.

Deletion of information held: Our partners (academic and funding) who are part of the interview panel and in receipt of CV information for interview candidates, will be required to delete that information supplied for those interviewees who are unsuccessful in their bid to become fellows, within two months of the confirmation of the outcome of the interview date and confirm by e-mail to the society that they have done so.

General e-mail communication (to/from the society):

The signature included at the bottom of all e-mails sent by the society includes a link to e-mail the society (research@thegriffinsociety.org) with a request to opt out from receiving any further contact from the society.

Contacts database (held by the society): will be updated to show where/when an ‘opt out’ has been received.

Deletion of information held: Any request to opt out will be dealt with within one month of receipt and an e-mail confirming the deletion of contact information, sent to the individual concerned. Once this has been done, the database will be updated, noting the date of removal and the specific contact information (e-mail, phone and/or postal) for the individual concerned will be deleted from the database. Only the individual’s name (no contact information) and the date of the request to remove their contact details and when complied with, will be retained.

The Griffins Society Website:

GDPR statement: the following statement has been included on the ‘About us/Governance’ page of the website (on the site from 21st March 2018):

The Griffins Society is registered with the Information Commissioner’s Office (ICO) as required by the Data Protection Act 1998. Any personal information collected about you will be used by the Griffins Society to fundraise and promote the interests of the charity; maintain our own accounts and records; and to supply you with information concerning the society’s activities. You have the right to ask for a copy of the information we hold, to have any inaccuracies corrected, and to tell us in writing if you do not wish to receive further correspondence from us. For all requests please contact: research@thegriffinssociety.org

Footer on web pages: The site footer on all pages provides contact details in the form of postal address, e-mail and mobile phone for the society which implicitly gives the public ‘permission’ to contact us.

The ‘**Contact us**’ links/forms on the website provide our e-mail address to contact the society. Anyone using the form to contact the organisation has chosen to do so in expectation of a response from the society. The information on the forms is held securely in the site database and user responses are e-mailed directly to the society.

User permissions: There are user permissions set up on the society’s website that only allow specific site users to access the data that is stored within the site. There are also access controls in place on the server, as well as a layer of security which limits access to the data stored there.

Cookies and Privacy Policies: our policy on cookies and also terms and conditions for using the website, can be found in the footer on every page of the website.

Any e-mail sent in response to a request for information will ask explicitly whether the individuals details can be retained for future use (notionally, name, e-mail address, and

where those details are given, phone number and details of employment). Any request not to retain such personal information will be dealt with within one month of receipt.

Use of marketing and communications software - Mailchimp:

The database within mail-chimp used for e-bulletin and other marketing communications:

All **Mail-chimp e-bulletins** have an opt-out built in to the bottom of the bulletin. Anyone who opts out of receiving the e-bulletin, their details are automatically removed from future mailings.

When the database was first constructed, an e-mail was sent to all those not already directly associated with the society (board members, fellows and supervisors, partners), to ask if they wished to receive the e-bulletin and giving the option to request 'opt-out'.

All potential new subscribers will be e-mailed and asked in the first instance, if they wish to receive communications from the society, which will necessitate holding details of their name and their choice of e-mail address.

Type of Information held directly by the society:

Contact and other information for Fellows and Supervisors – their contact details (home and work, phone, e-mail and postal addresses) and CV. Held in perpetuity unless requested otherwise so they can be updated on the activities of the society.

Secondary contact information – provided by fellows, of contacts details of interested parties for their research for report distribution purposes and seminar audience invitation and only held for the purpose of our own legitimate interests.

Professional contact details – these are only held for the purpose of our own legitimate interests.

Any initial contact made by the society will be on a generic Griffins e-mail which includes the ability to opt out of receiving e-mails from the society.

Holding of research subjects' personal data from research by fellows:

All fellows (explicitly not the society) are individually responsible for adopting appropriate processes for the (ethical) collection, holding and disposing of raw data generated by their research and will not hold onto data longer than is appropriate for the completion of the research or by separate agreement where appropriate to the research being carried out.

Principles

Principle 1:

Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless it is in the legitimate interests of the society.

Principle 2:

Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

Principle 3:

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Principle 4:

Personal data shall be accurate and, where necessary, kept up to date.

Principle 5:

Personal data processed for any purpose or purposes shall not be kept for longer than necessary for that purpose or those purposes.

Principle 6:

Personal data shall be processed in accordance with the rights of data subjects under this Act.

Principle 7:

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Principle 8:

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

ENDS