



Data Protection Policy

1.0 Context and Overview

1.1 Key Details

1.1.1 Policy prepared by:	Malcolm Fellows
1.1.2 Approved by the committee on:	26/02/2021
1.1.3 Policy became operational on:	01/03/2021
1.1.4 Policy to be reviewed annually	

1.2 Introduction

- 1.2.1 The Pathfinders Club (Solihull) is a local voluntary club formed in 1996 for the purpose of facilitating various walks and social events for its members.
- 1.2.2 The Pathfinders Club (Solihull) is managed by an elected committee of 5 officers and up to 5 committee members.
- 1.2.3 The Pathfinders Club (Solihull) needs to gather and use certain information about individuals in order to operate as a walking club for the benefit of its members.
- 1.2.4 These can include the members which belong to the club and other people that the club has a relationship with or may need to contact.
- 1.2.5 This policy describes how this personal data must be collected, handled, processed and stored to meet the club's data protection standards and to comply with the current General Data Protection Regulations.

1.3 Why this Policy Exists

- 1.3.1 This GDPR Club Policy ensures that The Pathfinders Club (Solihull):
 - Complies with the General Data Protection Regulation and follow good practice
 - Protects the rights of its members and partners
 - Is open about how it stores and processes individuals' data
 - Protects itself from the risks of a data breach.

1.4 General Data Protection Regulation & Data Protection Law

- 1.4.1 General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new EU regulation intended to strengthen and unify data protection for all individuals within the European Union. The regulation was adopted on the 27th April 2016 and became enforceable on the 25th May 2018.

1.4.2 The government have confirmed that the UK's decision to leave the EU will not affect the commencement of the General Data Protection Regulation.

1.4.3 The GDPR replaces the directive 95/46/EC of 1995 including The Data Protection Act 1998 although much of this act still applies in the GDPR. The GDPR describes how organisations, including The Pathfinders Club (Solihull) must collect, handle, process and store Personal Data.

1.5 Exemptions

1.5.1 Unlike a business, The Pathfinders Club (Solihull) is a not-for-profit club and therefore is exempt from formally registering with the Information Commissioner's Office (ICO).

1.5.2 However, The Pathfinders Club (Solihull) is still required to adhere to General Data Protection Regulation and it is the Club's policy to comply with all aspects of the GDPR.

1.5.3 These rules apply regardless of whether data is stored electronically, on paper or on any other type of material or format.

1.6 Coverage

1.6.1 The General Data Protection Regulation covers manual data as well as electronic data if it is:

- A set of information relating to individuals which is not processed on a computer.
- A set of information held in a 'relevant filing system'.
- A filing system with a structuring/indexing mechanism that gives easy access to personal information.

1.6.2 This could include information held on computers, fax machines, microfiche, paper in filing cabinets, on desks, paper in archives, index cards etc.

1.6.3 To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

1.7 Definitions

1.7.1 **'The Pathfinders Club (Solihull)'** is the 'Club' to which this General Data Protection Regulation Policy applies.

1.7.2 **'Data Protection Policy'** is the policy the Club has constructed to ensure that the Club operates within the framework of the GDPR and is totally transparent to its members in the way it collects and processes their Personal Data.

1.7.3 **'General Data Protection Regulation' (GDPR)** Regulation (EU) 2016/679 is a new EU regulation intended to strengthen and unify data protection for all individuals within the European Union. The regulation was adopted on the 27th April 2016 and became enforceable on the 25th May 2018.

1.7.4 **'Data Protection Act 1998'** and the directive 95/46/EC of 1995 is the previous UK act which was superseded by the General Data Protection Regulation on the 25th May 2018.

1.7.5 **'Collecting'** is the method, either by electronic (email, online) or by hard copy by which the Club obtains Personal Data from the Data Subject.

- 1.7.6 'Processing'** is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.
- 1.7.7 'Storing'** is maintaining a semi-permanent record of Personal Data either electronically or on hard copy, but which can be Erased at some point if the Data Subject withdraws their Consent.
- 1.7.8 'Data Subject'** is an individual or entity, such as a Club Member, external person or organisation who has personal data which is held by the Pathfinders Club (Solihull).
- 1.7.9 'Data Protection Officer'** is the appointed person, who is a committee member, who is responsible for the protection of data subject's personal data.
- 1.7.10 'Consent'** is the permission freely given to the Club by the Data Subject to enable the Club to use the Data Subject Personal Data.
- 1.7.11 'Erased' & 'The Right to be Forgotten'** is the Data Subjects right to withdraw their Consent at any time and to have their Personal Data erased and essentially be Forgotten.

1.8 The Principles

1.8.1 The GDPR is underpinned by Six important principles. These say that personal data must:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Processed in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

1.9 The Personal Data Guardianship Code

1.9.1 The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The Pathfinders Club (Solihull) will seek to abide by this code in relation to all the personal data it processes:

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that the club 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 General Data Protection Regulation's six data principles 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 the club 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.

2.0 Data Subject Permissions

2.1 Consent

- 2.1.1 The GDPR defines “the consent of the data subject” as “any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she by statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.”
- 2.1.2 The Pathfinders Club (Solihull) will obtain written consent from each member that The Pathfinders Club (Solihull) can collect, handle, process and store the members Personal Data, in accordance and within the terms of the Club’s Data Protection Policy.
- 2.1.3 The Club’s new member application form will contain a separate section specifically to obtain written consent. The format of this consent requires that the new member actively opts in to consenting for the Club to process their Personal Data.
- 2.1.4 The type of Personal Data the Club intends to process is defined in section 3.1.2. The club member can consent to the Club collecting, handling, processing and storing their Personal Data either in its entirety or in part by informing the Club on the consent form.
- 2.1.5 The member can amend their consent at any time by contacting the Club in writing either by email or by hard copy document to the Committee.
- 2.1.6 In the case of Junior Members, defined as under 18 years of age, the Club will require written Consent from the Child Parents or Legal Guardian.

2.2 Withdrawing Consent

- 2.2.1 Individuals have the right to have their data ‘erased’ or ‘The Right to be Forgotten’ in certain specified situations - in essence, where the processing fails to satisfy the requirements of the GDPR. The right can be exercised against controllers, who must respond without undue delay (and in any event within one month, although this can be extended in difficult cases).
- 2.2.2 **When Data is to be ‘Erased’**
 - When data are no longer necessary for the purpose for which they were collected or processed e.g. when the data subject is no longer a member.
 - If the individual withdraws consent to processing (and if there is no other justification for processing).
- 2.2.3 On receiving notification from the Data Subject, The Club will notify, in writing, to the Data Subject that his/her Personal Data has been permanently erased from all the Club’s databases and documentation.

3.0. People, Risks and Responsibilities

3.1. Policy Scope

- 3.1.1 This policy applies to:
 - All members of the Club
 - The Committee Members of the Club
 - The Officers of the club

- All contractors, suppliers and other people with whom the Club has a relationship with
- 3.1.2** It applies to all data that the Club holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:
- Names of individuals
 - Postal addresses
 - Email addresses
 - Mobile telephone numbers
 - Land line telephone numbers
 - plus, any other information relating to individuals
 - any data which enables the identity of a data subject to be known

3.2. What the Policy does not Cover

3.2.1 The very nature of The Pathfinders Club (Solihull) often means that members become friends and, as such, often exchange their personal information between, one or more, fellow members. Obviously, this is outside the control of The Pathfinders Club (Solihull) and the scope of the GDPR. The member(s) must understand that while they may consider, this is an acceptable practice, the disclosure of any of their personal data and information to other members of the Club is made by the member at their own discretion and done so entirely at their own risk. They must consider the consequences of disclosing personal data to other members both in the short and long term. Under these circumstances, The Pathfinders Club (Solihull) cannot be held responsible for any loss of personal data or any of the consequences resulting from such a loss.

3.3. Data Protection Risks

- 3.3.1** This policy helps to protect The Pathfinders Club (Solihull) from some very real data security risks, including:
- **Breaches of confidentiality.** For instance, information being given out inappropriately.
 - **Failing to offer choice.** For instance, all individuals should be free to choose how the Club uses data relating to them.
 - **Reputational damage.** For instance, the Club could suffer if hackers successfully gained access to sensitive data.

3.4. Responsibilities

- 3.4.1** Every member of the Club has some responsibility for ensuring data is collected, stored and processed appropriately.
- 3.4.2** However, these people have key areas of responsibility:
- The **Committee** is ultimately responsible for ensuring that The Pathfinders Club (Solihull) meets its legal obligations.
 - The **Data Protection Officer**, is responsible for:
 - Keeping the committee updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Handling data protection questions from members and Anyone else covered by this policy.
 - Dealing with requests from members to see the data The Pathfinders Club (Solihull) holds about them (also called 'subject access requests').

- Checking and approving any contracts or agreements with third parties that may handle Clubs sensitive data.
- Arranging data protection advice for people covered by this policy.
- Approving any data protection statements attached to communications such as emails and letters.
- Addressing any data protection queries from journalists or media outlets like newspapers.
- Where necessary, working with other members to ensure marketing initiatives abide by the data protection principles.
- Ensuring all systems, services and equipment used for storing data meets acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.
- Evaluating any third-party services, the Club is considering using to store or process data. For instance, cloud computing services.

3.5 General Member Guidelines

- 3.5.1** The only people able to access data covered by this policy will be The Pathfinders Club (Solihull) Committee Members who need it for the administration of the Club's affairs.
- 3.5.2** Data should not be shared informally.
- 3.5.3** The Pathfinders Club (Solihull) should ensure that each committee member understands their responsibilities when handling data.
- 3.5.4** Committee Members should keep all data secure, by taking sensible precautions and following the guidelines below.
- 3.5.5** In particular, **strong passwords must be used** and they should never be shared.
- 3.5.6** Personal data **should not be disclosed** to unauthorised people, either within the Club or externally.
- 3.5.7** Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- 3.5.8** Committee members **should request help** if they are unsure about any aspect of data protection.

4.0 Data Storage

- 4.1** These rules describe how and where data should be safely stored.
- 4.2** When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.
- 4.3** These guidelines also apply to data that is stored electronically but has been printed out for some reason:
- 4.3.1** When not required, the paper or files should be kept in a locked drawer or other securely locked place.
- 4.3.2** Committee members should make sure paper and printouts are not left where unauthorised people could see them.
- 4.3.3** Data printouts should be shredded and disposed of securely when no longer required.

- 4.4** When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:
- 4.4.1** Data should be protected by strong passwords that are changed regularly and never shared with unauthorised people.
 - 4.4.2** If data is stored on removable media (like a CD, DVD or memory stick), these should be kept locked away securely when not being used.
 - 4.4.3** Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
 - 4.4.4** Data should be backed up frequently. Those backups should be tested regularly.
 - 4.4.5** Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
 - 4.4.6** All servers and computers containing data should be protected by approved security software and a firewall.

5.0 Data Use

- 5.1** Personal data is of no value to The Pathfinders Club (Solihull) unless the Club can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft.
- 5.1.1** Personal data should not be shared informally.
 - 5.1.2** Personal data should never be transferred outside of the European Economic Area.
 - 5.1.3** Committee members should not save copies of personal data to their own computers except when the data is required for the administration of the Club, for instance, completing a mail merge. The data must be securely kept and not kept for longer than necessary to complete the required tasks.
 - 5.1.4** Personal data should not be included in the main body of any email.
 - 5.1.5** When sending 'Group' emails, for instance, to more than one member, the email address must be entered on the 'bcc' section on the email address bar. This avoids the recipients of the emails seeing the other recipients email addresses.
- 5.2** The Club requires various types of personal data from its members in order to make available to its members, information regarding the walks and social activities the Club facilitates. The Club also requires members personal data to keep accurate records within the Club for the purpose of administering the Club on a day to day basis. Processing of Personal Data is maintained on the basis of 'only what is absolutely necessary' and is kept to a minimum at all times.
- 5.3** The Club will collect the following types of personal data from its members:
- Full Name
 - Full Postal Address (including post code)
 - Land Line Telephone Number
 - Mobile Telephone Number
 - Email Address
 - Membership Number
- 5.4** How long does the Club keep Personal Data?
- 5.4.1** The Club will keep the members Personal Data for as long as the member remains a paid up member of the Club, where the member renews their membership of the club annually.
 - 5.4.2** or, until the member amends their level of consent previously. given, and completes a new consent. The previous consent will be destroyed, and the new consent becomes the current valid consent.

5.4.3 or, until the member completely withdraws their consent.

5.5 The Club will, at the annual membership renewal time, (during March) when the Club distributes the new membership cards, for each member, review the following:

5.5.1 Level of Consent

5.5.2 Accuracy of Personal Data currently on the Club's Data bases

5.5.3 Contact methods

5.6 Photographs of Members

5.6.1 The Club will occasionally post pictures of club walks and events on its website and other social media. As part of the GDPR consent, the Club will collect the appropriate permission from each member to 'Allow' or 'Not Allow' any photograph which contains their image to be used on the Club's website and social media.

5.6.2 The member can amend their consent to the use of their image at any time without detriment to their membership.

5.7 The membership of The Pathfinders Club (Solihull) is a participant walking club and therefore relies on distributing various information and documentation to enable its membership to make informed decisions regarding their level of involvement. The Club will communicate with members by any or all of the following methods:

- Email
- Post
- Mobile telephone
- Land line telephone
- Text message

5.8 The Pathfinders Club requires that certain essential Membership Documents, i.e. Annual Membership Cards need to be distributed directly to the members home address by post. The club reserve the right to deliver Membership Documents by post, irrespective of the Level of consent given regarding communication by post, unless the member makes arrangements to personally collect these documents.

5.9 The Pathfinders Club (Solihull) will distribute the following types of data and information to its membership:

5.9.1 Walks programme, this is a 2-monthly document outlining the forthcoming club core walks on Sundays and Wednesdays, which have been organised, and will be led by a club member.

This document will contain the email address and telephone number of the leader arranging that walk.

This information, and the details of the walk itself, is requested by the committee on the "Walk Request Form".

The club member must give his consent to this personal data being disclosed which is necessary to facilitate the walk, for instance, should a member require more information on the walk or, they have problems finding the location. This information is only included on the walk programme distributed to members. It is not included in the public domain such as the Club Web Site or Social Media.

5.9.2 Newsletters, documents informing members of club news.

5.9.3 Club information, documents informing members of club related items.

5.9.4 Long distance walks information

5.9.5 Walking holiday and short walking breaks, including accommodation and travel details and arrangements

5.9.6 Social events, barn dance, quiz nights etc.

5.9.7 Membership cards and membership renewal details

- 5.10** When a member resigns from the Club, that member's personal data will be deleted and disposed of from all Club databases and paper copies will be shredded in accordance with (section 2.2) 'Withdrawing Consent' and 'The Right to be Forgotten'.
- 5.11** However, if the resigning members would like to retain links with the club to be included in the social events they may elect to remain on the mailing list. Under these circumstances, the Club will preserve the members' personal data as a member within the scope of The Pathfinders Club (Solihull) Data Protection Policy until the member notifies the club that they no longer wish to participate at which point (section 2.2) 'Withdrawing Consent' and 'The Right to be Forgotten' will be implemented.
- 5.12** The Pathfinders Club (Solihull) maintains a policy of non-disclosure to any third party, by whatever means, and in relation to direct marketing by any third party. This policy also includes our affiliate partners, such as Ramblers, HF Holidays and Cotswold Outdoors. The personal data of all our members stays exclusively within The Pathfinders Club (Solihull) except when the following clause applies:
- (Clause 1) The Club will, from time to time, book on behalf of its members, various activities, for instance walking holidays, which may involve a third party organisation such as, for instance, HF Holidays, or other agents. The third party may request personal details of the club members as part of their booking protocol. Under these circumstances, the club member, by agreeing to participate in the activity organised by the Club, consents to the Club disclosing the personal data of the Club member, the third party has requested. The Club will only disclose the absolute minimum personal data and only what is necessary.
- 5.13** We will, from time to time, distribute to the membership, marketing material from our partners, where the club feels it may be of benefit to the membership. The Pathfinders Club (Solihull) will receive the marketing material from the organisation concerned and the Club will then distribute it to the membership via its own distribution network. This is the only way that the club membership will receive such material.
- 5.14** The only exception to this policy of non-disclosure to third party organisations is where the General Data Protection Regulation allows for disclosing data for other reasons. This is detailed in: section 9 (of this policy) 'Disclosing Data for Other Reasons'.
- 5.15** When a prospective applicant applies for, and is accepted for, membership of The Pathfinders Club (Solihull) and the applicant/member freely completes the General Data Protection Regulation Consent Form, the applicant/member agrees to give their consent to the Club to use their personal data within the scope of The Pathfinders Club's '**Data Protection Policy**' and the **General Data Protection Regulation**.
- 5.16** The Club Finances & That of Its Members
- 5.16.1** The Club maintains its finances through accounting software called Sage. This enables the club to control all aspects of its finances in a secure manner.
- 5.16.2** Only the Treasurer and Club Chairman have access to Sage and to the Club Bank Accounts
- 5.16.3** Within Sage, the club maintains a database of its members and their financial activities associated with the Club.
- 5.16.4** The Personal Data contained within Sage is as follows:
- Member Name
 - Member Home Postal Address
 - Email Address

- Land Line Telephone Number
- Mobile Telephone Number
- Club Membership Number

- 5.16.5** In addition to the Personal Data detailed (*in section 5.9.4*) a record of all financial transactions with the Club are maintained within the members database.
- 5.16.6** The Club does not maintain a record of members bank details on the Sage Database. However, a member's bank details may be required where certain monies (e.g. a refund for an event) need to be transferred from the Club's bank account to the members bank account. In this case the members bank details are held on the Clubs Bank (Santander) database. The member has the option of either keeping their bank details on the bank's database (for future transactions) or their bank details can be deleted as soon as the transaction has been made.
- 5.16.7** The Club operate a Direct Debit system through a third party called 'GoCardLess' to enable members to pay their annual subscription fees by Direct Debit. Members sign up directly through GoCardLess and receive confirmation emails directly from GoCardLess for any amendments the member makes.
- 5.16.8** Club members can request, at any time, a Statement detailing their financial transactions with the club.
- 5.16.9** Written consent (*as in section 2.1*) will be requested when a new member joins the club so that the Club can use their Personal Data within Sage.
- 5.16.10** The right to 'Withdraw' consent and 'To be Forgotten' (*as in section 2.2*) applies to all Personal Data held within Sage.

6.0 Data Accuracy

- 6.1** The law requires The Pathfinders Club (Solihull) to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort The Pathfinders Club (Solihull) should put into ensuring its accuracy.
- 6.2** It is the responsibility of the committee who work with the data to take reasonable steps to ensure it is kept as accurate and up to date as possible.
- 6.3** The Pathfinders Club (Solihull) will, on an annual basis, when renewing a member's membership, check with the member that the personal details that the Club holds for that member is accurate and to inform the member to notify the committee of any change to their personal data.
- Data will be held in as few places as necessary. Committee members must not create any unnecessary additional data sets.
 - Committee members should take every opportunity to ensure data is updated.
 - The Pathfinders Club (Solihull) will make it easy for data subjects to update the information The Pathfinders Club (Solihull) holds about them.
 - Data should be updated as inaccuracies are discovered. For instance, if a member can no longer be reached on their stored telephone number, it should be removed from the data base.

7.0 Subject Access Requests

- 7.1** All individuals who are the subject of personal data held by The Pathfinders Club (Solihull) are entitled to:
- Ask what information the Club holds about them and why.

- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the Club is meeting its data protection obligations.

7.2 If an individual contacts the Club requesting this information, this is called a 'Subject Access Request'.

7.3 Subject access requests from individuals should be made either by email, addressed to the data protection officer at walking@solihull-pathfinders.club. or contact a Committee member directly to request the standard request form. The data protection officer can supply a standard request form, although individuals do not have to use this.

7.4 The data protection officers aim to provide the relevant data within 7 days.

7.5 The data protection officer will always verify the identity of anyone making a subject access request before handing over any information.

7.6 Contacting the Club

Members may contact the Club at any time with regards to their Personal Data. These reasons can include, but not limited to:

- Subject Access Requests
- Consent
- Amending Consent
- Withdrawing Consent

7.7 Methods of contacting the Club

Members can contact the Club by Email

7.8 Who to Contact:

The Club Secretary : walking@solihull-pathfinders.club

We aim to answer all requests within 72 hours.

8.0 What the GDPR Provides

8.1 The GDPR provides the following information:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

9.0 Disclosing Data for Other Reasons

9.1 In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

9.2 Under these circumstances, The Pathfinders Club (Solihull) will disclose the requested data. However, the data protection officer will ensure the request is legitimate, seeking assistance from the committee and any legal advisors where necessary.

10.0 Providing Information

10.1 The Pathfinders Club (Solihull) aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

10.2 The Pathfinders Club (Solihull) is committed to complete transparency and openness with its membership in all aspects of the way it handles, stores and processes personal data and adheres to the principles and scope of the GDPR.