

# **London Guild of Weavers, Spinners and Dyers**

## **Data Protection Policy Statement**

This two-part document sets out how the London Guild of Weavers, Spinners and Dyers manages its obligations under the Data Protection Act 1998 (DPA) with regard to the information it holds on its members. Part 1 outlines how the Guild deals with its members' personal data with reference to the relevant DPA requirements; in Part 2 the key requirements of the Act are summarised.

### **Part 1: How the Guild deals with members' personal information**

#### **Purpose of collecting members' personal data**

The Guild collects and processes relevant items of personal data about its members, activity participants, invited speakers and contractors so that the Guild can operate effectively and provide appropriate services to its members (DPA Principle 2).

#### **Processing of members' personal data**

The personal data processed is that contained in the Guild's membership application and renewal form. This information is collected when a member joins, and, to ensure that it is up to date, is thereafter collected annually when the member renews (DPA Principle 4). The Guild membership year runs from 1 January to 31 December. Individual member's data may also be updated, to reflect changes, at other times during the year.

#### **The Guild's use of members' personal data**

The personal data contained in the membership application and renewal form are received by the Membership Secretary. The personal data of members who apply or renew online are also received by the Treasurer and by the Webmaster and website.

The Membership Secretary collates these data and produces a master list which is updated monthly to reflect any new members, resignations, and changes of contact details (DPA Principle 4). This master list is used to record, manage and analyse the Guild's membership.

Selected extracts of this master list are shared by the Membership Secretary with the following as necessary for their roles:

- every month with the Secretary for general communications to members;
- every month with the Webmaster for loading onto the website as a Contact List to facilitate communication between members;
- every month with the Treasurer to produce the sign-in sheet for Guild meetings;
- every quarter with the member(s) responsible for distributing Warp & Weft;
- from time to time with other Guild officers and members as necessary to further the Guild's constitutional objectives.

The Treasurer uses the personal data of those members who apply or renew online as evidence of payment. Single online payments by activity participants who are not Guild members are treated in the same way.

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For the purposes of the DPA, the Guild's Data Controller is the Executive Committee and any Guild member who uses any part of the personal data is a Data Processor (see Part 2).

Other Guild members may use members' personal data derived from the Contact List or directly provided by individual members, for purposes such as informing about the activities of the Guild's Interest Groups, events, workshops, outings and other activities relevant to Guild members.

Any paid-up Guild members who use personal data from any of these sources must follow the below procedures on storage, security and retention. Ex-members must destroy any personal data they hold. Personal data on Guild members must never be passed to non-members without the permission of the relevant member(s).

### **Storage of members' personal data**

The personal information of Guild members is held on various computers and in paper form.

#### **Computers:**

- The Membership Secretary's master list is held in a file on her computer. Subsets of this dataset are held in files on the Guild's website and on the computers of the above officers and members who are acting as data processors.
- Individual membership application and renewal forms which have been completed electronically are held on the Membership Secretary's computer.
- Individual membership application and renewal forms which have been completed as part of the online payment process are held on the Membership Secretary's computer, on the Treasurer's computer, on the Webmaster's computer and on the website.
- Other personal data which has been provided by members in connection with participating in and payment for Guild activities are held on other Guild members' computers from time to time.

#### **Paper:**

- Each year's individual membership application and renewal forms completed on paper are held in a file, which also contains printed copies of the forms completed electronically and as part of the online payment process for that year.
- There is a ledger, dating from 1951, which lists, consecutively, the names, addresses at time of joining, dates of joining, dates of leaving (where known) and 4-digit membership numbers of all past and present Guild members. This ledger is considered a historical record under DPA Principle 5.

### **Security of members' personal data (DPA Principle 7)**

The Membership Secretary's paper and computer files are held under normal domestic security arrangements. Similarly those officers and members who are acting as data processors hold the computer files under normal domestic security arrangements. All know it is necessary to treat the information securely and not allow any third party to view or access it. Password protection of individual files is encouraged.

The Contact List on the website is in the members-only area which can only be accessed by a password issued annually to members. Those members who at joining/renewal have requested that their details are withheld from this list do not appear on it. Members may request that their personal

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data are made available or removed from the Contact List on the website at any time, not just at joining or renewal.

### **Retention of members' personal data (DPA Principle 5)**

The Membership Secretary retains the individual membership application and renewal forms relating to each membership year, whether electronic or paper, for two years. The Membership Secretary retains the electronic master lists for two years. This is so that recent members can be contacted when appropriate. At the end of these periods the computer files for the relevant year are permanently deleted and the paper records shredded.

The Treasurer retains the personal information from individual membership application and renewal forms of members who pay online for one year, after which point the files are permanently deleted.

Auto-archived copies of previous website membership lists and the personal information from individual membership application and renewal forms of members who pay online are removed and destroyed by the Webmaster.

Those officers and members who regularly receive selected data from the master list from the Membership Secretary are required to permanently delete the previous computer file when provided with the latest one.

Officers and members who have created computer and/or paper files containing members' personal data and the data of any other activity participant, event speaker or contractor, solely for the purpose of involvement in Guild activities are required to delete / destroy them as soon as the relevant activity is completed.



## Part 2: Key aspects of The Data Protection Act 1998

### Definitions

The Data Protection Act 1998 regulates the processing of personal data. **Personal data** means data which relate to a living individual who can be identified from the data. **Processing**, in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data.

The Act protects the rights of individuals whom the data is about (**data subjects**), mainly by placing duties on those who decide how and why such data is processed (**data controllers**). Data subject means an individual who is the subject of personal data. Data controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. Data controllers must ensure that any processing of personal data for which they are responsible complies with the Act. **Data processor**, in relation to personal data, means any person who processes the data on behalf of the data controller.

### The eight data protection principles

Schedule 1 to the Data Protection Act lists the data protection principles in the following terms:

1. Personal data shall be processed fairly and lawfully
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.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
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.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

London Guild of Weavers, Spinners and Dyers

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