

Information Harvesting and Retention Policy

Overview

Under the provisions of the General Data Protection Regulation, effective from 25th May 2018, we are obliged to state our policy on data collection ('information harvesting') and retention. This should be read in conjunction with our accompanying *Privacy Statement*.

Scope and extent of data sought

We seek no more information that is necessary to communicate the nature of our work to our supporters and allied organisations. This extends to no more than contact name, address, telephone number, email, and brief description eg 'holds information', willing to volunteer' etc. We hold no sensitive or personal information.

We are an organisation that relies principally on electronic communications in the first instance but we recognize the possible future need for communicating with our supporters by telephone or post.

Method(s) of capture

General

In responding to enquiries we will henceforth routinely include in our response:

- * details of our Privacy Statement on how we deal with information
- * a 'permissions and consent' form for completion by the recipient, with a view to adding to our database.

We will not accept permissions and consents verbally - all will either be by electronic means or hard copy, recorded on our database as 'E' or 'H'. Preferred methods of communication will also be shown as 'email', 'phone' or 'post'. A 'date of birth (if under 18)' will assist our future compliance with any child protection issues that may arise. Our requirement for this feature will be reviewed periodically.

Electronic

Electronic consents will be held by that database holder on a secure system as described in our Privacy Statement and accessible only by the database holder or his/her nominated deputy.

Hard copy

Hard copy consents will be scanned in and the originals destroyed securely once the scanned copy has been checked.

Outside events

Data obtained at outside events (eg fairs and shows) may be captured initially on hard copy using our standard form that will also usually include a signature of the data donor. It will then be transferred to our database and the hard copy destroyed.

Data entered directly into a database at such events, eg via a laptop computer, will be undertaken in the presence and view of the donor and a record kept of such entry and permissions.

Data collectors

Data collectors from BGF or acting on its behalf will be fully appraised before any data is obtained at an event as to the need for security, ie:

- * forms will not to be left unattended
- * forms will not to pass to the hands of unauthorised third parties
- * forms will not be left on open display with the possibility of others viewing them
- * forms will be put into an envelope of cardboard folder which is marked *BGF Only*
- * verification of electronic capture, where applicable, will be collated
- * hard copy will be handed to the database controller for action as above a.s.a.p

Business cards

It is common practise for data to be captured by participants being invited to offer their business cards into a collection, often in return for some form of prize or reward but almost inevitably as a means on obtaining contact details.

BGF does not routinely use this method but should it do so then clear and unambiguous signage will be placed on and around the collection point and that potential donors will be *given 'adequate notice of intent'* before and during the event. This may be, for example, by stating as such on any admission ticket. Each case will be judged on its merits and a decision taken by the Trustees as to best practise, with such decisions being recorded openly in their meeting minutes.

Business Cards will be scanned in and destroyed securely once the scanned copy has been checked.

Other methods as yet unidentified or not routinely used

As above, each case will be judged on its merits and a decision taken by the Trustees as to best practise, with such decisions being recorded openly in their meeting minutes. The principle of *honest and reasonable belief* as to compliance will be paramount.

All other communications than those described, for example responding to unsolicited letters and other communications, should be accompanied by a 'permissions and responses' request together with details of, or where to view, our Privacy Statement.

Retention of data

Our procedures for amending and reviewing data held on our database are clearly expressed in our *Privacy Statement*. In essence:

- * we only seek such data as is necessary to fulfill our purpose
- * we never divulge data to third parties
- * data is reviewed *ad hoc* on a regular basis
- * data will be formally reviewed typically every 2 – 3 years
- * we respect the 'right to be forgotten' and will remove data on request
- * hard copy material will be destroyed once it has been scanned onto the system

- * we do not record telephone calls
- * we do not contact supporters by sms (text)
- * we do not knowingly use 'cookies'
- * data will be accessed and used only by the person with responsibility for its use or his/her nominated deputy
- * our database and records are open to inspection at any reasonable time
- * our database and records can be amended, updated or deleted by the data donor at any reasonable time
- * data will not be sent outside of the organisation
- * data will not be exchanged via USB pen, disc or other means.

Data will be removed from the computer system as soon as the data subject requests that they no longer wish to hear from the BGF or if they do not respond to an email asking them to confirm they wish to continue hearing from us.

Recording changes

Our agenda for the meeting of BGF Trustees will henceforth routinely include an item of update on data protection matters. In this way we can openly demonstrate we are self-monitoring our DP activity even if there is on occasions 'nothing to report'.

Other than for minor or technical amendments, our database contributors will be kept informed of any changes to policy and procedure by means of our database information procedures, website updates and other promotional/communication material.

Miscellaneous provisions

BGF will ...

- * act at all times in accordance with existing legislation and other provisions
- * be pro-active in our compliance with data protection and allied requirements
- * seek professional advice when required to assist us in our deliberations
- * keep our supporters informed of all substantive changes to policies and procedures
- * continue to demonstrate and promote its *bona fides* in handling personal data

GF@BGF
www.britishglassfoundation.org.uk
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