

Avon Occupational Safety & Health Group (AOSH) Policy on Maintaining the Confidentiality of Membership Data

Purpose

- a) To comply with the General Data Protection Regulation (GDPR).
- b) To fulfil the commitment of AOSH as a Member of SGUK Groups that information will only be used for the administration of the affairs of the organisation.
- c) To nominate a controller who determines the purposes and means of processing personal data.

Arrangements

- a) The membership data is only to be used for the administration of the affairs of the organisation.
- b) In the absence of any other formal resolution of the Committee, and or AGM or EGM, for the purposes of GDPR the Controller shall be the Secretary of AOSH.
- c) Before membership contact data is released by the controller, the person requesting information is required to give a written undertaking that they will abide by this Policy and ensure that the information will be treated as confidential and not released to any other unauthorised person or organisation
- d) The controller shall obtain and record the written confidentiality agreements. In this context, agreement by e-mail is suitable and sufficient.
- e) Data should be retained for a maximum of 6 months after membership ceases, or contact with an interested party ceases, and contact details updated regularly.
- f) The information released shall be appropriate to meet the objectives of the request.
- g) The Committee, under the guidance of the Chairman, is responsible for monitoring, reviewing, and ensuring these arrangements are effective on an annual basis.
- h) This policy should be reviewed periodically by the Committee.

Scope

All AOSH committee officers have access to Contact Details, so all members of the committee are expected to give their formal agreement to maintain the confidentiality of membership data and an undertaking that it will only be used for the administration of the affairs of the organisation.

Anyone with access to contact lists must respect the confidentiality of the data and not pass it on for any unauthorised marketing purpose.

Evidence:

Evidence must be retained by the Secretary, Chairman, Treasurer or designated controller that permission to use the data has been provided. This is usually by means of a signed form or an electronic statement.

Statement:

AOSH operates on a voluntary basis. The ethos of the organisation is to provide a focal point for members and to disseminate information on appropriate topics.

AOSH is a 'not for profit' organisation which means that the group is exempt from registration with the Information Commissioner's Office.

We need to collect and use certain types of information about individuals, companies, and members who come into contact with us, in order to carry out our work.

This personal information must be collected and dealt with appropriately – whether on paper, on a computer or recorded on other material – and there are safeguards to ensure this under the General Data Protection Regulation and any future legislation that may arise.

AOSH currently holds information on the following people:

- Individuals who have contacted the organisation.
- Individuals who are the designated contacts for member companies, along with officers of those companies.

- Individuals who work in the field of Health and Safety and therefore by the nature of their role may be seen as potential members, and visit the various meetings, exhibitions and conferences where representatives of the organisation may be present.
- Individuals who have responded to information published regarding meetings or conferences.

AOSH may make contact with individuals in the future:

- Following discussions with our representatives at events.
- By invitation.
- By circulating electronic communications that includes interested third parties.

SGUK currently holds the personal information relating to contacts, in full or in part:

- Full name and surname.
- E-mail address (work and/or personal).
- Workplace name.
- Telephone numbers.
- Personal or company postal addresses provided by these contacts in order to supply essential information
- Addresses, and other personal details of elected committee members and officers.

A designated person is nominated to control this information and advise anyone who processes such information.

Personal Information is held in order to:

- Contact individuals on the activities of AOSH.
- Invite individuals to various meetings.
- Promote regional and national Health and Safety Events.
- Provide up to date information relating to Health and Safety issues.

AOSH does not request nor store sensitive information about members or interested parties, such as details of:

- Racial or ethnic origin.
- Political opinions.
- Religious or similar beliefs.
- Trade union membership.
- Physical or mental health.
- Sexual orientation.
- Criminal record, unless this prevents a person becoming a trustee or senior manager of a charity.

AOSH stores information by electronic and written means as follows:

- E-mail addresses are stored in various electronic address book/contact lists held by the Chairman, Secretary, Treasurer and Co-ordinator.
- Individual names, workplace, e-mail address (and signature) are stored on hard copy attendance lists and later transferred to an electronic document.
- Individual names of attendees will be taken from any attendance lists to produce electronic communications.

Information is protected by members of the Committee by the following measures:

1. Information held by electronic means i.e. PCs/computers:

- Passwords are used on computers to prevent unauthorised access.
- Passwords are not shared.
- Selected passwords are changed at regular intervals.
- Computers are closed down when left unattended in areas where access may be gained.
- Information is transferred to others or between computers, when necessary, by e-mail or secure sharing programs e.g. Dropbox, WeTransfer, MailBigFile etc.
- Portable USB sticks may be used for transferring documents to other computers or people.

2. Information held by manual means (i.e. handwritten; printed hardcopy):

- Written information is stored safely in a secure location when not in use.
- Information will not be left in an open environment.
- When written information is transferred between locations, it will not be left unattended during transfer
- Information will not be shared with third parties for marketing purposes.
- Information will only be shared with necessary people relating to group activities, such as access to attendance lists.

In advertising AOSH events, confirming places at various events, etc., the BCC option (blind carbon copy) will be used for sending multiple contact information by an e-mail message.

Communication amongst more than five persons will normally be undertaken using the Bcc option to help minimise data collection by computer robots.

In some situations however, e-mail addresses may be shared with voluntary bodies with aims and ethos that align with our own, such as Safety Groups UK or RoSPA.

Under no circumstances will e-mail addresses, names and workplaces be shared with third party marketing companies, external individuals or external companies.

In the event that a third party wishes to make contact with a member of the group, the following safeguards will apply:

- E-mail addresses will not be provided to third parties by members of the Committee or the Co-ordinator without the explicit permission of the member concerned.
- The e-mail address/contact number of the enquirer and reason for the request shall be noted.
- A member of the Committee will contact the group member by e-mail and outline the nature and reason of the enquiry, with the enquirer's contact details, and invite the member to contact the enquirer direct.
- The individual will therefore make the decision whether to make contact or not.

Unfortunately, we are unable to prevent third parties or robots extracting such details from our website or from publications issued at exhibitions or events that allow local groups to be contacted with marketing information.

There are expectations that anyone supplying such contact information will be confident, given the information in this statement, that personal information will be stored securely and used appropriately for AOSH business only.

Removal of information:

AOSH appreciates that some individuals may decide that they do not want their information held on any contact database or, on some occasions, to be shared by e-mail transmission with other members.

Members therefore, have the option of requesting that their information is removed from the database and no further contact, on behalf of the organisation is made.

If any individual wishes to have their details removed from the various databases in use, please copy and paste the following request into a return e-mail and send to AOSH using the address on the 'Contact' page of our web site, or by sending direct to the Chairman, Treasurer or Secretary.

Please mark for the attention of the Controller, using 'AOSH Database Opt-out' in the subject line.

Where possible personal e-mails from Committee members to external contacts should contain this option to unsubscribe. The Secretary and designated controller should maintain a list of anyone making this request and keeping the Board members updated.

REQUEST FOR REMOVAL FROM ANY AOSH DATABASE

To be sent to the Chairman, Secretary or Treasurer of AOSH.

AOSH Database Opt-out

I request that my full details - name, e-mail address, postal address, and workplace – be removed from your database.

I understand that I will no longer be contacted by anyone from AOSH to inform me of the details of the organisations activities, meeting information and newsletters etc.

I understand that I may contact AOSH at any time to have my details put back on the database.

Name: e-mail address:

Date:

Document history
First draft Nov 2018
Complete re-write Feb 2023 – JP to SGUK model
Reviewed Nov 2023
Next review by Nov 2028