

**The Artillery Clerks' Association
of the Royal Artillery Association
and
the EU General Data Protection Regulation.
Version 1 – As at 25th May 2018**

Preliminary notes

1. The European Union (EU) General Data Protection Regulation, or the European General Data Protection Regulation, as it is variously known, is referred to hereafter as GDPR.
2. GDPR provides all of the EU with a single common regulation for Data Protection to replace the various National laws that preceded GDPR. It comes into effect on 25th May 2018.
3. Although the United Kingdom (UK) intends to leave the EU, the UK government has declared its determination to follow the GDPR rules now, and after the UK leaves the EU.
4. This document has been prepared before any specific Guidance to Branches of the Royal Artillery Association (RAA) is available from the Regimental Headquarters Royal Artillery (RHQ RA). It will be reviewed once such guidance is available.
5. The Artillery Clerks' Association is referred to hereafter as The Association.

Part One - Introduction

- 1.1 This document does NOT deal with information managed by the RAA.
- 1.2 Equally it is not concerned with data held by individual Branches of the RAA. It is up to each Branch to decide and action its own response to GDPR.
- 1.3 This document confines itself to the data owned and managed by the Association and held by its Officers.
- 1.4 This document sets out the pieces of data, owned and managed by the Association, that contain, or may at times contain, Personal Information and thus make that data the subject of GDPR.
- 1.5 It also defines or revises the procedures of the Association in relation to such data, in such a way that they are GDPR compliant.
- 1.6 By its existence, this document demonstrates that serious, active, efforts have been made to achieve compliance with GDPR.

Part Two - The Data

- 2.1 The Association identifies the following information assets which include, or may at times include, Personal Information:

The Association Members' Postal Address and Contact List.

The Association E Mail Address List

The Association Website.

The Association Magazine – The Crossed Quills.

The records held by the Association Secretary.

The records held by the Association Treasurer, Association Welfare Officer & Association Historical Secretary.

The Minutes and Correspondence held by the Association Secretary.

- 2.2 The Association Members' Postal Address and Contact List is managed by the Secretary and is reviewed at least annually, sometimes more frequently. It consists of a database of the last known postal address of Association members.
- 2.3 The Association E Mail Address List provides the Secretary with an efficient Email communication route with Officers and members of the Association.
- 2.4 The Association Website potentially contains the following personal information:
 - a) The Name and Office of members of the Association Committee.
 - b) The names of recently deceased members of the Association with date of death
 - c) May from time to time name Association members celebrating Anniversaries, Promotions and Honours and Awards.
- 2.5 The Association Magazine (The Crossed Quills) is published and circulated to Members annually and potentially contains the following personal information:
 - a) The Name and Office of members of the Association Committee and the Name of potential Members.
 - b) The names of recently deceased members of the Association with date of death
 - c) May from time to time name Association members celebrating Anniversaries, Promotions and Honours and Awards.
 - d) Photographs on past events of a historical nature (including Reunions, Ceremonial, Team photographs, etc.)
- 2.6 The records held by the Association Secretary, Treasurer, Association Welfare Officer & Association Historical Secretary may include Personal Information provided by Members on Membership Application Forms, Bank Standing Orders, Gift Aid Mandates, Historical Returns, Welfare reports/referrals etc.
- 2.7 The Minutes and Correspondence of the Association may, from time to time, mention individuals by name and also include some personal information about named individuals, Prospective members, past members who may, or have not, held office within the Association and of Widows.

Part Three - Procedures

- 3.1 The principles:
 - a) Wherever Personal information is collected for one or more of the items mentioned in paragraph 2.1, great care will be taken to ensure:
 - * accuracy,
 - * the awareness of the Individuals named,
 - * their consent to the inclusion of that Personal Information, and
 - * their awareness of this document defining the use and retention of this information.

3.2 The Association Members' Address and Contact List

- a) With immediate effect the Association Members' Address and Contact List will cease to be a dynamic document/data base. Each edition will show the date, or the several dates, on which it was correct. It is a snapshot at a particular time, with no guarantee that it will be correct the following day. As and when changes are notified, a new edition may be compiled: circulation will occur at the sole discretion of the Association Secretary.
- b) For the Association Members' Address and Contact List, the objectives stated in 3.1.a) will be achieved when the Secretary is able to annotate the Address and Contact List with the following statement:

" I have consulted each of the Members named on the Association Members' Address and Contact List, and obtained his explicit consent that this information may be used in the Association Members' Address and Contact List and in the Association E Mail Address List for as long as he remains a member of the Association, or for as long as he holds an office in this Association – and until the publication of the next edition thereafter of the Association Members' Address and Contact List, whichever period is the longer.

Each Member is aware of the uses and the retention of this Personal Information as it is defined by Association's document on GDPR compliance dated 25th May 2018." (i.e. this document) "

- c) The consent must be explicit, but it may be written, email, or oral. (if oral, the Secretary is to keep a note of the date of that conversation.)
- d) If any Member is unwilling to consent, or unduly tardy about doing so, the Secretary will exclude such Members, without further delay, from the Association Members' Address and Contact List.
- e) Once published and circulated, just like a telephone directory, or any other directory, control of disposal of the document, and control of further distribution, moves to the recipient. Individual Members have authority to share the Association Members' Address and Contact List, but are required to observe, and pass on, the existing rule that the document is not to be available to non-Members.
- f) The Association requires secure disposal but has no way to enforce compliance. The Secretary may at his discretion withhold future editions from individual Members found to disregard this requirement.

3.3 The Association Website.

- a) No additional procedures are required for the Association website except as noted in 3.3.d) & 3.4.e)
- b) The information described in 2.4.a), 2.4.b) and 2.4.c) is covered by the procedures described in 3.2.a)
- c) New notices of forthcoming events will not normally go beyond the categories mentioned above.
- d) If other forms of Personal Information are to be added to the website, the Association Webmaster may decide to review the GDPR implications with the Secretary who in turn may involve the Chairman.
- e) The Association webmaster is to add to the website a Privacy Policy statement. This should be appropriate to the functionality of the website which may vary over time.

3.4 Association Treasurer's records.

- a) Such records relate to the expense claims of Association Officers. These records are only available to current and future Treasurers and to auditors. They are retained for the normal retention period for financial records and for as long thereafter as is necessary until convenient, secure, disposal is possible.

3.5 Minutes and Correspondence.

- a) Minutes and Correspondence are a significant part of the Association's archive. They rarely contain Personal Information.
- b) With immediate effect great attention will be given to restricting Personal information in Minutes and outgoing Correspondence to names without any related information.

(That is NOT an attempt to say that there has been less care in the recent past.)

- c) The usual process for approval of minutes at the next meeting will continue to provide for accuracy. If it is considered that Personal information linked to a named individual MUST be recorded, the principles noted in 3.1.a) will be carefully applied.

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