



BABAO Data Protection Policy 2024

This document outlines the measures that the BABAO Board of Trustees will take to comply with UK Data Protection Laws and EU GDPR regulations (the latter in line with adequacy status rules).

Approach to data protection

Personal data submitted through the membership form will be held by the Membership Secretary alone. Trustees may ask for personal data to correspond with specific groups within the membership or for financial purposes. Data will be transferred between Trustees using access restricted files on the Trustee Google Drive, and the files will be securely deleted after use. The Membership Secretary is responsible for making sure that the personal data are held on an encrypted and password protected device, and that data are securely passed between the Membership Secretary and other Trustees. Data will not be used for any reason other than that specified at the time of request from the Membership Secretary, and will not be permanently stored by any Trustee (except for the Membership Secretary).

There is no need for BABAO to complete a Data Protection Impact Assessment because BABAO's data processing is unlikely to result in a high risk to individuals.

Personal data in the form of photographs and additional information offered to the Trustees will be stored by the Outreach Officer and the Communications Officer in a limited access Google Docs folder. The consent forms will be stored in a separate limited access folder, by the Outreach Officer and the Communications Officer.

Compliance with Data Protection Policy

There will be an annual review of the policies to monitor compliance, carried out by the Data Protection Lead. The results of this review will be reported to the Trustees, and any required changes will be implemented by the Data Protection Lead. The Data Protection Lead will ensure that they remind Trustees of their Data Protection responsibilities on a quarterly basis. This is to

ensure that Trustees maintain awareness and vigilance about GDPR compliance, and to update Trustees about any breaches or concerns raised by members.

The DPL will ensure that during Trustee handover following elections, any secure information such as passwords and access to sensitive information is handled with the utmost care. The DPL will recommend that any passwords are shared verbally and that no record is kept of them once handover is complete.

The DPL will take the responsibility of ensuring that access to shared databases is limited to the new Board only and will ensure that any access is restricted to named editors only.

Process for dealing with data information requests

Members can view the information that is currently held about them. To request this, members may contact the BABA0 Membership Secretary (currently Bennjamin Penny-Mason at membership@babao.org.uk), copying in the Data Protection Lead (currently Ariadne Schulz at ariadne.schulz@gmail.com).

Members wishing to amend or update any information, can complete the 'Updating Your Details' form which is available on the BABA0 website: <https://babao.org.uk/get-involved/join/current-member/>.

Completed forms should be sent to membership@babao.org.uk. Any out-of-date information will be corrected within one month and confirmation of completion will be sent.

Members wishing to delete, restrict or object to the processing of their personal data, are encouraged to contact the Membership Secretary and the Data Protection Lead on the email addresses provided above. It is necessary for BABA0 to hold certain information about members in order to run the organisation, but they will be happy to discuss any concerns, and remove unnecessarily stored information. The outcome of the request will be documented.

If Trustees receive a verbal request about personal data, they will forward the information to the Membership Secretary and the Data Protection Lead. All requests for updating personal data will be dealt with within one month.

Process for dealing with a security breach

If there is a security breach, this should be reported immediately to the Data Protection Lead. They will put mechanisms in place to investigate and implement recovery plans if possible. Affected individuals will be contacted to inform them about the breach, and if necessary, the event will be reported to the ICO (Information Commissioner's Office), the independent regulator which exists to protect people's information rights. All data breaches will be documented by the Data Protection Lead even if they do not need to be reported to the ICO. BABA0's Data Breach Policy can be read for more information.

Making a complaint about data

Members who are unhappy about the way BABA0 is managing and using personal information, should email the Data Protection Lead, (currently Ariadne Schulz at ariadne.schulz@gmail.com).

If BABA0 is approached by a member who is unhappy about them holding specific information, the request will be brought to the Membership Secretary and the Data Protection Officer. They will discuss the issue and the outcome of the request will be documented.

If, after correspondence with BABA0, a member is still unhappy, they have the right to complain to the Information Commissioner's Office.