

Gloucestershire Advanced Motorists



Data Protection Policy

Version 3

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1. Introduction

This document defines the Data Protection policy and processes to be adopted by the Gloucestershire Advanced Motorists ('The Group') (Registered Charity No 1054403) to protect personal information held by The Group.

This policy is established to ensure that The Group complies with the General Data Protection Regulations (GDPR) which took effect in May 2018.

The Group is affiliated to the Institute of Advanced Motorists ('IAM RoadSmart'). This policy reflects the Data Protection guidance issued by IAM RoadSmart up to March 2019 and may require update if later guidance is published by IAM RoadSmart.

2. Terminology

Members are members of The Group who are paid up members of IAM RoadSmart.

Associates are members of The Group who have enrolled with IAM RoadSmart for the IAM RoadSmart Advanced Driving course and have not yet completed that course.

Friends are other members of The Group.

Observers are those Members of The Group qualified, or gaining qualification, to conduct Associates' observed drives.

Henceforward in this document, 'Members' shall be interpreted as including Associates and Friends unless explicitly stated otherwise.

3. Personal Information held by The Group

The Group holds a limited amount of personal information on its Members.

Personal information relating to a Member will be supplied to The Group either by the individual Member or by IAM RoadSmart.

A Member's personal information held by the Group shall be limited to:

- The Member's name
- The Member's contact details (address, phone numbers, email address)
- The Member's year of birth
- The Member's IAM Membership number

Additionally, The Group will hold:

- information directly relating to each Associate's progress on the Advanced Driving Course
- email addresses of non-Members wishing to receive The Group's newsletter
- contact details (address, phone numbers, email address) of non-Members who have requested Free Tasters or otherwise expressed interest in The Group's activities.

4. Access to Personal Information held by The Group

Access to Members' Personal Information held by The Group shall be limited to the following officers and officials of the Group:

- The Chairman
- The Secretary
- The Membership Secretary
- The Chief Observer and, if appointed, the Deputy Chief Observer(s).
- The Associate Coordinator
- The Data Manager
- The Treasurer
- The Group's Young Driver Ambassador

Additionally, access to an Associate's contact details and information relating to an Associate's progress on the Advanced Driving course will be granted to the individual Associate's Observer(s) and to the Associate Coordinator and to the Chief Observer and the Deputy Chief Observer(s), if appointed.

5. Use of Personal Information held by The Group

Use of a Member's Personal Information held by The Group shall be limited to:

- Group membership administration
- provision of information on Group events and Road Safety to Members
- distribution of the Group newsletter

The Group will share personal information with IAM RoadSmart solely for the purposes of administering Group and IAM memberships.

The personal information will not be shared with any other third parties.

From time to time, The Group will publish pictures, videos and written articles relating to Group events at which Members may have been in attendance or referred to, on social media sites and Group related websites and make this data available to IAM RoadSmart for publicity purposes.

6. Members' Rights

At any time, a Member may request a copy of his/her Personal Information held by The Group and the use to which it is being put by contacting the Secretary. No charge will be made for provision of such information **by email**.

A Member may request a copy of this Data Protection policy by contacting the Secretary, or may view it on the Group website.

Annually at the time of Group membership renewal, each Member will be provided, generally by email, with a summary of his/her personal information held by the Group and a copy of the Privacy Notice forming Annex B of this document, and will be invited to provide any updates or corrections to the personal information. At the same time, the Member will be reminded of the options to cease receiving information from the Group and/or to request he/she does not appear in material published by the Group.

A Member may at any time exercise those options by notifying the Secretary by email or letter.

7. Associate Data

The primary record of an Associate's progress on the IAM RoadSmart Advanced Driving course is the Associate's run sheets which form part of the course book issued to the Associate on enrolment. That book is retained by the Associate for the duration of the course and thereafter it may be retained or destroyed by the Associate.

The Observer will complete a run sheet in the Associate's course book at the end of each observed drive.

The Observer will report, as a minimum at monthly intervals, the progress of each of his/her Associates to the Associate Coordinator. The Associate Coordinator will use those reports to maintain a Group record of all Associates' progress. Access to that record will be limited to the Associate Coordinator and the Chief Observer and to the Deputy Chief Observer(s), if appointed, and to the Membership Secretary and the Chairman.

The Observer may maintain his/her own record of an Associate's progress, but that record may only be retained until the Associate completes the course, except that in the event an Associate fails the Advanced Driving test, the Observer may retain that record until it is clear that the Associate does not wish to be retested or after 12 months whichever is the earlier.

For those Associates gaining "Membership By Portfolio", The Group will retain a softcopy of their portfolio in a location to which access is granted to the Chairman, the Chief Observer and the Associate Coordinator only for a maximum of two years. Additionally, The Group provides a softcopy of the portfolio to IAM RoadSmart.

The Group will delete or destroy all personal information and data relating to an Associate who fails to complete the Advanced Driving course until whichever is the earlier of:

- it becoming clear that the Associate does not wish to resume the course, or
- 12 months after dropping out or test failure.

The Group may retain depersonalised data on Associates' progress on the Advanced Driving course for performance monitoring purposes and may share that data with IAM RoadSmart.

8. [On Joining The Group](#)

Each new Member of the Group will be provided, generally by email, with a copy of the Privacy Notice forming Annex B to this document.

9. [Free Taster and Other Enquiries](#)

A register of contact details of members of the public who have requested Free Taster drives will be maintained by The Group. Individuals' information will be deleted from that register when they enrol on the Advanced Driving course or six months after completing the Free Taster whichever is the earlier.

A register of contact details of those who have enquired about the activities of The Group will be maintained by The Group. Individuals' information will be deleted from that register no more than three months after their enquiry.

10. [Data Storage](#)

All material containing Members' personal information in hardcopy form shall be securely stored in a locked cabinet.

The primary repository for Members' personal information will be IAM RoadSmart's 'Driver, Training and Examiner database' ('The DTE'). Those of The Group officers and officials needing access to the DTE will be given password protected accounts by IAM RoadSmart.

They are required to comply with IAM RoadSmart's data protection policy when using the DTE.

The secondary repository for Members' personal information shall be the 'Dropbox' server system.

The Group may hold Member's personal information on 'Dropbox' in dedicated folders which have access granted to those of the Group officials and officers having legitimate need to access the data therein.

Both the DTE and Dropbox are subject to regular backup by IAM RoadSmart and the Dropbox organisation respectively. Further backups do not need to be maintained by The Group.

The information held on Dropbox shall be minimised and shall limited to that which is not readily held on the DTE, in particular the Associate Progress data (Section 7), Financial data and Free Taster and Other Enquiries (Section 9).

The exports of personal data from the DTE or Dropbox may be made by those officers and officials to their private computers solely for the purposes described in Section 5. Such exports must be regarded as working copies and must be deleted promptly after use.

Any computer account which holds Members' personal information or which has access to the DTE or to the Dropbox folders containing Members' personal information shall be password protected and shall be locked when unattended. The password to such computer accounts shall only be known to one or more of the Group officers and officials detailed in Section 4.

The Members' personal information held in such computer accounts and any backups of such accounts shall be stored in a manner which readily permits the purging of the personal information.

Group officers and officials intending to use their private computers for processing Members' personal information shall inform the Group Data Manager.

Group officers and officials on relinquishing their appointments shall provide assurance to the Group Data Manager that all Members' personal information has been purged from their private computers and any associated backups.

Group officers and officials using their private computers for Group or IAM business should consider creation of a user account dedicated to Group and IAM business.

11. [Emails](#)

Emails sent by The Group to a number of Members shall use Bcc addressing or MailChimp.

The organisation of emails in any computer used for sending emails to Members shall be such that all emails sent to or received from Members may be readily deleted.

12. Members' Bank Account Details

The Chairman, Treasurer and Membership Secretary have online access to The Group's current bank account and will from time to time download statements of that account.

Such statements may reveal details of Members' bank accounts. Those downloads will be saved to a folder in Dropbox to which only those 3 individuals have access. The three individuals will make no use of any bank account details contained in those statements and will not share those statements with any other party.

Additionally, the Treasurer will hold the bank account details of those Members to whom the Group routinely make payments, of expenses for example.

13. Data Retention

The Group will delete or destroy all of a Member's personal information, except that held in the Ex-Member Register (Section 14 refers):

- promptly when the Member resigns from The Group
- within three months of termination of the Member's membership due to non-payment of annual subscription.

Note that retention of Associates' personal information is covered in Section 7.

Other information shall be retained for the periods in the following table.

DOCUMENT TYPE	LEGISLATIVE REASONS FOR RETENTION	REQUIREMENT
CORPORATE/CONSTITUTIONAL RECORDS		
Royal Charter/Bylaws/Trust Deed/unincorporated association constitution	Charities Act 2011	Permanent
Trustee/director minutes of meetings and written resolutions	Companies Act 2006 Charities Act 2011 CIO (General) Regulations 2012	10 years
Members' meetings etc Minutes/resolutions	Companies Act 2006 Charities Act 2011 CIO (General) Regulations 2012	10 years
TAX AND FINANCE		
Annual accounts and review (including transferred records on amalgamation)	Companies Act 2006 Charities Act 2011 CIO (General) Regulations 2012	10 years
Tax and accounting records	Finance Act 1998 Taxes Management Act 1970	6 years from end of relevant tax year
Information relevant for VAT purposes	Finance Act 1998 and HMRC Notice 700/21	6 years from end of relevant period
Banking records/receipts book/sales ledger	Companies Act 2006 Charities Act 2011	6 years from transaction
Deed of covenant/Gift Aid declarations and correspondence re donations	As part of tax records	6 years after last payment or 12 years if payments are outstanding or dispute over deed
Legacies – correspondence and financial records		6 years after completion of estate administration

14. Ex-Member Register

When a Member ceases to be a member of the Group, either on resignation or on termination due to non-payment of annual subscription, the Member's name and IAM Membership Number and date of resignation or termination will be entered in an Ex-Member Register.

This register shall be used solely to enable the Group to identify the ex-Member in the DTE in the event an issue arises regarding the individual's past Group membership.

Access to the Ex-Member Register shall be limited to the Membership Secretary, the Secretary and the Chairman.

The Member's details shall be deleted from the Ex-Member Register 10 years after the date of resignation/termination.

15. Data Disposal and Destruction

All material containing Member's personal information in hardcopy form which is due for destruction shall be shredded. The Group shall arrange shredding facilities for those officers and officials not so equipped.

All other material in hardcopy form which has exceeded the retention period given in Section 13 shall be shredded.

All Member's personal information which is due for deletion as defined in Section 13 which is contained in files held in electronic form by The Group shall be deleted from those files.

The DTE is the primary repository for Members' personal information, it is IAM RoadSmart's responsibility to ensure that all Member's personal information which is due for deletion is removed from the DTE in accordance with IAM RoadSmart's Data Protection policy.

The Group's responsibility in respect of the DTE is limited to the Membership Secretary deleting from the DTE the link of an IAM Member to The Group:

- when the Member resigns from The Group
- within three months of termination of the Member's membership due to non-payment of annual subscription.

16. Duties of the Data Manager

The Group shall appoint a Data Manager who will be a member of the Group committee.

The Data Manager shall:

- ensure that all Group officers and officials entitled to handle Members' personal information are aware of this policy document and understand their obligations under the policy.
- ensure that the policy and processes defined in this policy are followed.
- review and, if necessary, update this document annually.

- ensure that this document takes account of any Data Protection guidance issued by IAM RoadSmart.
- manage access rights to any folders in Dropbox holding Members' personal information.
- provide guidance to Group officers and officials on Data Protection.
- seek advice from IAM RoadSmart on any Data Protection matters beyond his/her competence.
- investigate and, if appropriate, report any apparent Data Protection breaches.
- manage Members' requests to exercise their data options. Section 6 refers.
- maintain a register of Data Protection breaches recording, for each breach:
 - date occurred
 - date recorded
 - description
 - impact assessment
 - whether reported to IAM RoadSmart
 - date reported
 - whether reported to ICO
 - date reported
 - action taken
- review relevance of historical data

17. [Data Protection Breaches](#)

Any Member believing that personal information held by The Group or by IAM RoadSmart has been subject to a Data Protection breach, should report this by email or letter to the Group Secretary.

In the event that a Member believes that IAM RoadSmart has been responsible for a Data Protection breach, the Member is at liberty to bring this to the attention of IAM RoadSmart direct.

The Group Data Manager shall investigate each alleged breach and if proven shall, with the prior knowledge of the Group Chairman, report the breach to IAM RoadSmart and, if appropriate, to the ICO.

Guidance on Data Protection Breaches published by IAM RoadSmart in March 2019 is provided in Annex A.

18. [Registration with the ICO](#)

The Group has chosen to register with the Information Commissioner's Office (ICO).

The Group's ICO registration number is Z1151233.

19. [Transitional Arrangements](#)

The Group's past practice was to maintain personal information in a Microsoft Access database on the Membership Secretary's private computer.

All working and backup copies of the Group Database have now been deleted.

It should be noted that currently the DTE contains more extensive Member's personal information than that listed in Section 3. Until the DTE is modified or its contents reduced, The Group will have access to and will handle information exceeding that in Section 3. The duration of this situation is beyond The Group's control and cannot be predicted.

20. Guidance

Any Member requiring clarification of this document or guidance on its application or having a suggestion for change to it should contact the Group Data Manager, currently Andrew Bowden at membership@glosiam.org.uk or 07801 716443.

Annex A Data Breach Guidance

The following guidance on what might constitute a Data Breach and when any Data Breaches should be reported is contained in the IAM RoadSmart Group Handbook of March 2019.

The Group will comply with that guidance to the extent that it is practicable.

What is a personal data breach and how do we respond to it?

What is personal Data?

Personal data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information. What identifies an individual could be as simple as a name, number, location data, email address etc.

What is a personal data breach?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>

Examples of data breach:

1. An email is sent to all committee members showing email addresses of all recipients
2. Committee member allowing family member to access and view secure data

What to do if you need to report a breach:

When a personal data breach has occurred, you need to establish the likelihood and severity of the resulting risk to people's rights and freedoms.

If it's likely that there will be a risk then you must notify the ICO; if it's unlikely then you don't have to report it.

However, if you decide you don't need to report the breach, you need to be able to justify this decision and document it.

Data breach where IAM RoadSmart is the controller:

If a data breach has occurred you will need to notify IAM RoadSmart immediately (and in any event no later than 24 hours) after having or identifying the Personal Data Breach.

Please report any Personal Data Breach to data.protection@iam.org.uk

Data breach where the Group is the controller:

Report a personal data breach to the relevant supervisory authority (ICO). You must do this within 72 hours of becoming aware of the breach, where feasible.

You must also keep a record of any personal data breaches, regardless of whether you are required to notify the relevant supervisory authority (ICO).

IAM RoadSmart must also be informed of the breach of the Personal Data Breach. Please report any Personal Data Breach to data.protection@iam.org.uk

Details of how to report a personal data breach can be found on the ICO website

<https://ico.org.uk/for-organisations/report-a-breach/>

<https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>

IAM RoadSmart must also be informed of the breach of the Personal Data Breach. Please report any Personal Data Breach to data.protection@iam.org.uk

Data Subject Requests:

Notify IAM RoadSmart immediately (and in any event no later than 24 hours) of any Data Subject Requests received where IAM RoadSmart is the controller.

Gloucestershire Advanced Motorists Privacy Notice

Who we are

Gloucestershire Advanced Motorists ('The Group') is an independent registered UK road safety charity (Registered Charity No 1054403), affiliated to IAM RoadSmart. We help to improve driver skills through coaching and education including support to Associate Members preparing for the IAM RoadSmart Advanced Driving test.

The Group is run by part time volunteers.

The Group acts as the data controller/data processor when collecting and processing your data.

This Privacy Notice covers The Group's collection and use of your personal information which you give us or which we receive from IAM RoadSmart. This Notice is a component of The Group's Data Protection Policy to which reference should be made, if more detail is required. That Policy is published on our website glosiam.org.uk.

If you have any questions about this Notice or concerning your personal information we hold please contact us using the contact details provided at the foot of this Notice.

Our basis for processing your personal information and what we use it for

The Group holds a limited amount of personal information on its Members.

Personal information relating to a Member will be supplied to The Group either by the individual Member or by IAM RoadSmart.

A Member's personal information held by the Group shall be limited to:

- The Member's name
- The Member's contact details (address, phone numbers, email address)
- The Member's year of birth
- The Member's IAM Membership number

Additionally, The Group will hold:

- information directly relating to each Associate's progress on the Advanced Driving Course
- email addresses of non-Members wishing to receive The Group's newsletter
- contact details (address, phone numbers, email address) of non-Members who have requested Free Tasters or otherwise expressed interest in The Group's activities.

The Group aims to be very clear when we collect your personal data and will not do anything you wouldn't reasonably expect in order to provide the products and/or services that you request, to communicate with you, and to personalise our information we send to you.

Use of a Member's Personal Information held by The Group shall be limited to:

- Group membership administration
- provision of information on Group events and Road Safety to Members
- distribution of the Group newsletter

The Group will share personal information with IAM RoadSmart solely for the purposes of administering Group and IAM memberships.

The personal information will not be shared with any other third parties.

From time to time, The Group will publish pictures, videos and written articles relating to Group events at which Members may have been in attendance or referred to, on social media sites and Group related websites and make this data available to IAM RoadSmart for publicity purposes.

Disclosure of information to third parties

The Group will share your details IAM RoadSmart when necessary for the purposes of managing your membership of The Group and of IAM RoadSmart. The Group will not share your details with other third parties.

We may also disclose your personal information, if we are required to do so under any legal obligation.

How we use cookies

"Cookies" are small pieces of information sent by a web server to a web browser, which enables the server to collect information from the browser.

The Group's website, glosiam.org.uk, is a component of the IAM RoadSmart website. Information on the cookies employed by that site is provided at www.iamroadsmart.com/privacy-notice#cookies.

How long do we keep your information?

The Group will delete or destroy all of a Member's personal information, except that held in its Ex-Member Register:

- promptly when the Member resigns from The Group
- within three months of termination of the Member's membership due to non-payment of annual subscription.

An Ex-Member's personal information will be deleted from the Ex-Member Register no later than 10 years after leaving The Group.

Your rights

At any time, a Member may request a copy of his/her Personal Information held by The Group and the use to which it is being put by contacting us using the contact details given below. No charge will be made for provision of such information **by email**.

A Member may at any time exercise the options to cease receiving information from the Group and/or to request he/she does not appear in material published by the Group.

Contact us

If you have any questions about our privacy policy or information we hold about you, please contact us:

- in writing to:

The Data Manager
Gloucestershire Advanced Motorists
Birch Tree House
Coombe
Wotton-under-Edge, GL12 7ND
- by email to: membership@glosiam.org
- by telephone to: 07801 716443

This Policy was last updated in August 2019