



Data Protection Policy and General Data Protection Regulation (GDPR)

Introduction

This policy sets out the principles that the Institute will follow in relation to personal data that it holds about all data subjects. It also sets out obligations in relation to personal data in the Institute's possession.

If any clarification of the terms of this policy is required, whether information amounts to personal data and/or whether certain actions amount to processing, contact should be made with the Business Support Manager

Data protection laws protect personal data about identifiable individuals both in their private and professional capacities. As a business, the Institute may have personal data about members, contacts and others. This policy primarily relates to member data.

This policy is enacted under the By-Laws of the Institute.

Definitions

For the purposes of understanding this policy, these definitions have the following meanings: -

- i. 'Data Controller' means a person or organisation who processes personal data about a living individual. The Institute is a data controller for personal data about members and is registered with the Information Commissioner.
- ii. 'Personal Data' means data relating to or about an identifiable individual. The Institute processes personal data about members.
- iii. 'Sensitive Personal Data' is a category of personal data which is information regarding racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, physical or mental health or condition, sex life and information about offences. Although unlikely, the Institute may process some sensitive personal data about members.
- iv. 'Data Subject' means an individual who is the subject of personal data. This includes members, job applicants, employees, consultants, agency workers, temporary staff, casual workers, contract workers, work-experience placements, gap-year students and ex-employees.

- v. 'Processing' includes the holding, obtaining, recording, organising, retrieving, consulting, using, adapting, altering, disclosing, transferring, disseminating and destroying of information. Processing extends to any operation or set of operations carried out on information or data and therefore covers everything we do with personal data.

Processing Data

The Institute processes personal data (both manually and electronically), including sensitive personal data, for a number of reasons, including but not limited to: -

- i. Payment of salary and benefits, payroll, taxation, national insurance (and other statutory or contractual deductions from salary), reimbursement of expenses and business travel.
- ii. Health and safety matters.
- iii. Disciplinary, grievance, complaints and performance management.
- iv. Any other purposes required by law, regulation or as deemed necessary by the Institute for the management of its employees, contractors or its business.

Sensitive personal data will only be processed by the Institute very rarely but could include: -

- i. The Institute's obligations under the Equal Opportunities Act.
- ii. As required by applicable laws and regulations.

Collection of Data

The Institute collects and records personal data from members' applications and also for the Risk Assessors Register.

Disclosure and Transfers

Personal data is not transferred to third parties to process but may be subject to confidentiality arrangements approved by the Institute.

The Institute may disclose personal data to comply with any legal or regulatory obligation or requirement.

Retaining Data

The Institute endeavours to ensure that the personal data held is accurate and that inaccurate, irrelevant and excessive information is either deleted or rendered anonymous as soon as is reasonably practical. However, the Institute may retain some personal data (including sensitive personal data) in order to comply with legal and regulatory obligations and requirements and for other legitimate business purposes.

The Institute reserves the right, at its absolute discretion, to retain personal data (including sensitive personal data) after the termination of membership or any contractual arrangements for purposes including but not limited to equal opportunities monitoring, health and safety records and in relation to possible or actual legal claims.

Security

The Institute will take appropriate technical and organisational security measures to protect personal data and to prevent any unauthorised or unlawful processing or its loss, damage or destruction. Factors involved when considering whether security measures are appropriate include the nature of the personal data and the potential harm which could result from unauthorised access.

Data subject's rights

All data subjects of the IFSM have the following rights with regards to their held data;

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

Subject Access Request

The IFSM Data subjects have the right to request access to the data that relates to them. If requested, the IFSM will comply within one month of receiving a request, however, can refuse or charge for requests that are manifestly unfounded or excessive. If a request is refused, the IFSM will inform the Data Subject of the reason of refusal. The Data Subjects then have the right to complain to the supervisory authority and to a judicial remedy if they believe justified.

General Data Protection Regulation (GDPR)

EU regulations regarding data protection came into effect 25th May 2018. Whilst awaiting information regarding EU law and the BREXIT process, the Institute will follow these Regulations until a new data bill is announced as part of UK law.

To be compliant with the new Regulations the Institute must demonstrate that it has consent to use members data. To this end we informed members individually and from members replies the Institute trusts that they are content for their personal data to be held securely on our systems. However, members have the right for their data to be removed from our system at any time.

As part of its overall data protection policy, no data or details of membership are, or will be made publicly available or published by the Institute

For information, the data the Institute holds on its internal system is as follows:

Data Held	Data Origin	Required Field?
First Name	Member Submitted	Y
Mid Initials	Member Submitted	N
Surname	Member Submitted	Y
Job Title	Member Submitted	N
Company	Member Submitted	N
Home Address	Member Submitted	Y
Landline Business	Member Submitted	N
Mobile Business	Member Submitted	N
Landline Home	Member Submitted	Y
Mobile Home	Member Submitted	Y
Email address	Member Submitted	Y
Title	Member Submitted	Y
Photo	Member Submitted	N
Qualifications – Professional Qualifications, Academic Qualifications, Year Attained & Reg No's.	Member Submitted	N
Full CV	Member Submitted	N
Professional Reference Name	Member Submitted	N
Professional Reference contact Number	Member Submitted	N
Professional Reference Contact Email address	Member Submitted	N

Any member can review their data by contacting the IFSM office and asking what details are currently on file for the individual (or organisation). Any changes to data can be performed after a written request (which can be done via email or letter) or via the online membership platform (if applicable).

Expired membership data will be retained for 6 months prior to expiry to avoid additional application fees on re-application and will then be promptly destroyed. Memberships that are explicitly cancelled (not lapsed) will have the associated data disposed of with immediate effect.

Members have a right to complain to the Information Commissioners Office (ICO) if they feel there is a problem with the way we the Institute is handling their data.

Appendix 1 below sets out all data held for members and organisations.

GDPR – Appendix 1 - List of Data Held

Members

Data Held	Data Origin	Required Field?	Shared with?
First Name	Member Submitted	Y	Personal data is not transferred to third parties to process but may be subject to confidentiality arrangements approved by the Institute.
Mid Initials	Member Submitted	N	
Surname	Member Submitted	Y	
Job Title	Member Submitted	N	
Company	Member Submitted	N	
Home Address	Member Submitted	Y	
Landline Business	Member Submitted	N	
Mobile Business	Member Submitted	N	
Landline Home	Member Submitted	Y	
Mobile Home	Member Submitted	Y	
Email address	Member Submitted	Y	The Institute may disclose personal data to comply with any legal or regulatory obligation or requirement.
Title	Member Submitted	Y	
Photo	Member Submitted	N	
Qualifications	Member Submitted	N	
Full CV	Member Submitted	N	
Professional Reference Name	Member Submitted	N	
Professional Reference contact Number	Member Submitted	N	
Professional Reference Contact Email address	Member Submitted	N	

Employees/Council members

Data Held	Data Origin	Required Field?	Shared with?
The Same data as our members plus some or all the below depending on function			
Bank details	Employee/expenses claimant submitted	N/a	No-one, no 3rd party Companies, no personnel within the Institute that does not require access to this data to carry out their role e.g. payroll. Not held directly by IFSM, only held securely by 3 rd parties such as HSBC & Intuit. The Institute may disclose personal data to comply with any legal or regulatory obligation or requirement.
National Insurance number	Employee submitted	Y	
Tax Code	Employee submitted	Y	

NAFRAR Member

Data Held	Data Origin	Required Field?	Shared with?
Name	Member Submitted	Y	Publicly available at; http://www.ifsm.org.uk/fra-registers/assessors/ but not explicitly shared by the IFSM with any other organisations
Full Address	Member Submitted	N	
Telephone	Member Submitted	Y	
Email	Member Submitted	Y	
Website	Member Submitted	N	
Certification scheme	Member Submitted	Y	
Profile	Member Submitted	N	

Accredited Course Providers

Data Held	Data Origin	Required Field?	Shared with?
Organisation Contact Name	Member Submitted	Y	Publicly available at; http://www.ifsm.org.uk/accreditation/trainers/ but not explicitly shared by the IFSM with any other organisations
Organisation Full Address	Member Submitted	Y	
Organisation Contact number	Member Submitted	Y	
Organisation Contact Email	Member Submitted	Y	
Organisation Website	Member Submitted	N	

Affiliated Companies

Data Held	Data Origin	Required Field?	Shared with?
Organisation Contact Name	Member Submitted	Y	Not shared by the IFSM with any other organisations – the only publicly available data would be your company logo, only if given consent to go onto our website
Organisation Full Address	Member Submitted	Y	
Organisation Contact number	Member Submitted	Y	
Organisation Contact Email	Member Submitted	Y	
Organisation logo	Member Submitted	N	