



GENERAL DATA PROTECTION REGULATION POLICY

Status:	Council Approved
Date Ratified:	May 2018
Name of Originator or Author:	Council/ PCC Coordinators
Review Date:	May 2020
Target Audience:	Public & Members
History:	Updated Policy to comply with GDPR

The Society of Teachers of the Alexander Technique ("STAT") collects and maintains personal information in order to carry out its work. We respect your privacy and all personal information is treated with appropriate levels of security.

The main principle is that:

All data collected and/or stored by STAT is done so for the sole purposes of STAT business and an individual's relationship with STAT. This will include, but is not limited to the following:

- To facilitate communication with members and other supporters.
- Internal marketing activities.
- To analyse for the purposes of targeted mailing and the development of STAT's activities.
- Statistical profiling to enable us to review, develop and improve the services which we offer supporters and to enable us to provide you and other supporters with relevant information.
- Offering and providing benefits, services, goods or products to members and supporters, including notification of publications and CPD information.
- We may use your information to make decisions about you using computerised technology, for example automatically selecting services which we think will interest you from the information we have. We may contact you (by e-mail, telephone, text message, mail or otherwise) about information relating to services which we consider may be of interest to you.
- We collect information to maintain membership records and to enable us to send notices (for example, of the Annual General Meeting) to members as we are legally bound to do so.
- We require information prescribed by the Inland Revenue in order to administer Deeds of Covenant or Gift Aid.
- We may use additional information (if you are prepared to supply it) to provide other facilities and information to you to maximise the benefits of your membership.
- We have to maintain a record of payments made by you for our accounts (and for making claims against a Deed of Covenant or under Gift Aid). We also have to protect our property and assets; again we are legally bound to do this.
- If you visit the STAT Office we will need to record information to administer your visit, we may need to contact you if for any reason your visit cannot go ahead.

An individual's personal data will not be shared with a third party without prior written consent.

- No member of the Office Team or Council will share any personal data with a third party without the prior consent of the individual. This excludes contact details as they appear on

the STAT website in the event of a public enquiry, inclusive of name, address, email address and phone details if uploaded with your previous consent. STAT will not share contact details that do not appear on the online register.

- All STAT Staff will sign a consent form for their business email address, phone number and associated business contact details to be circulated for the sole purposes of STAT business.
- All STAT Council members must agree to allow STAT Staff to freely use their contact details but do not agree that they are circulated to external third parties without prior consent on a case by case basis. Council members agree to avoid using their own personal details for business correspondence.
- All STAT Committee and Group members must agree to allow STAT Staff to freely use their contact details for the sole purposes of STAT activities. This may include circulating them to external third parties provided they appear on the online register.

How long will STAT keep Personal data?

- Records of payments made by you will be retained for as long as required for STAT to meet its legal obligations to maintain financial records.
- All information (updated as appropriate) will be kept for the length of your membership agreement and for a maximum of 6 years after your membership has ceased.
- The following information will be retained for historical and archive purposes: a) your name, b) your training dates, c) which training school you trained at and d) who was your head of training.
- In the event of a complaint against you, STAT will retain the relevant information for up to 25 years.

In order to carry out some of the above it will be necessary for STAT to disclose information to other parties. Personal information will be made available to STAT employees. Data about you may be shared for communication purposes with Affiliated Societies overseas in countries which may not have laws protecting personal data. No sensitive or other personal data will be shared.

Personal data will also be released to agents, contractors and other service providers but only for the purpose of such agents, contractors or other service providers using the information on behalf of STAT. Where, occasionally, STAT uses the services of such organisations, they are contractually obliged to process personal data in a secure and confidential manner under strict instructions. Such organisations include those who provide approved legal, financial and membership services or who distribute STAT mailings and publications. See below for more information on who we share your data with.

You have the right to ask for a copy of the information which STAT holds on you and to request that any inaccuracies be corrected.

If you have any concerns about, or objections to, the use of data for these purposes by STAT, please contact the Data Protection Officer in writing at the address below or by e-mail on office@stat.org.uk.

This Notice may be amended from time to time and will be regularly published in STAT material.

Data Storage

- STAT will retain paper files of personal data for each member, including but not limited to applications of membership and proof of completion of training, as well as for financial transactional data.

- STAT will carry out quarterly full IT security audits in collaboration with their specialist IT support contractor
- Financial Data
 - ♦ Where financial transactional data is retained onsite it will be stored in a lockable safe or filing cabinet where access is restricted to the General Manager, the Membership Officer and the Administrative Officer. The data is treated as confidential and is only shared with authorised parties. Authorised parties include: the STAT Treasurer, the Organisation and Resources Committee members, the financial/accounting consultancy Anchora Services.
 - ♦ Financial transactional data (e.g. invoices issued by STAT or issued to STAT by you) from previous financial years will be held secured in a locked room for 6 years which only STAT staff has access to.
 - ♦ After their expiry any paper records will be shredded and disposed of.
 - ♦ STAT holds no financial transactional information for online payments via the STAT website. These are all managed by SecPay. STAT holds no payment information.
 - ♦ When processing financial information over the telephone the staff member taking the call must **not** write down or record any of the information given to them except directly into the Barclays PDQ payment terminal. They must not repeat back any card details and if they require clarification they will ask the caller to repeat the details. The transaction should not be processed on speaker phone.
 - ♦ The bank account information of members who pay by Direct Debit is held in a lockable filing cabinet and in the safe. The files containing this information should only be updated by the General Manager. This data should not be disclosed under any circumstances. If and when the member resigns or cancels their Direct Debit the financial information will be removed.
 - ♦ The STAT electronic membership database is hosted and maintained by Kashflow, <https://www.kashflow.com/contact/>
 - ♦ No PC or workstation shall be left unattended without a suitable password protected screen saver. All PCs and workstations should be closed and password protected overnight.
 - ♦ All Staff should use only their own login to access PCs and membership databases and only share their login details with the General Manager.
- In order to show compliance to the General Data Protection Regulations all staff will also sign this policy to show they have read and understood their responsibility to personal data.
- The Office staff will meet quarterly to conduct a GDPR audit to ensure full compliance.
- All staff have signed as part of their contract of employment a confidentiality clause.

Membership

- On joining STAT each member must be told that STAT will not under any circumstances use their data for any other purpose than for processing and marketing of the Society and membership deliverables. The data will not be circulated to third parties unless members give their prior written consent. This is made clear at the beginning of the application process and on every newsletter.
- From time to time the Society is approached to circulate relevant matters on behalf of third parties (including other members), this is managed from the Society's Office. On joining STAT members can opt out of internal distribution of such information.

Data Rights

- The data held by STAT can only be as accurate as the information supplied to STAT. It is the responsibility of the individual member to ensure their data is accurate and they are encouraged to check their online information regularly and update accordingly and also notify the STAT office.
- Once a member's relationship with STAT has become inactive their personal electronic and paper data will be retained for 8 years before deletion (except in the event of direct debit information which will be deleted as soon as they are no longer members, historical data like training courses attended and training dates, and information in relation to complaints).
- A member may at any time contact the STAT Office at office@stat.org.uk to request that STAT removes their personal data. It should be noted that the removal of all personal data (including contact details) will result in STAT no longer being able to carry out the processing of the Society and membership services, and the respective member will be considered as resigned and no further communication will follow.
- An individual may at any time raise a concern by contacting office@stat.org.uk. For further details on your rights visit the Information Commissioner's Office at <https://ico.org.uk/for-the-public/>

How we collect data

We collect information from you by email, fax, letter or phone communication, and occasionally in person.

Types of data we hold

- Your personal contact details (name, address, phone numbers, email addresses)
- Hard copy of your application to become a member
- Training information, moderation dates and other admin related information
- Hard copy of your STAT certificate
- DBS (or similar) information (including DBS certificate no. and date of birth)
- Access to DBS records via CBS shared system
- Your teaching contact details
- CNHC registration forms
- Emails and letters you have sent to us
- Record of insurance claims
- In the event of a complaint any information relating to that (complaint form, evidence, recordings of meetings)
- When paying by Direct Debit, a copy of the mandate form you sent to STAT containing the name of account holder, bank address, account no. and sort code
- When sending us a cheque (before we bank it): account name and amount.
- Partial card details on PDQ receipts and Excel log (four last digits of 12-digit number)
- Information on previous transactions (e.g. previous invoices sent to members)
- If available on the STAT website, photos, videos and articles (the copyright of which always belongs to the respective member who made them available)

Who we share your personal information with

We may share your personal information with companies and service providers we cooperate with:

- The public following an enquiry for a teacher provided your details appear on the STAT website
- For website listings:
 - Peat Fire Studios – STAT website developers
- For Accounting Purposes:

- Kashflow (from January 2015)
- Sage / Access (until December 2014)
- Anchora Services & Northline Business Consultants Ltc – STAT Accounting consultants
- The Co-Operative bank (for Direct Debit processing)
- For communication purposes:
 - Constant Contact (with your consent to receive enewsletters like ST@T, CPD, AT in the Media and communication from the STAT Office and Council)
 - Lavenham Press Printers (name, address and membership number for STATnews mailouts)
 - Occasionally with the AT Affiliated Societies
- For PR and Marketing Purposes
 - Litmus PR Agency
 - BackCare (with your consent)
 - Dentists Provident
- For Office Technical Support
 - Jinca IT
- Disclosure and Barring Service
 - Data collected via CBS online shared drive and paper applications