



THE ROYAL SUSSEX REGIMENTAL ASSOCIATION LIMITED

DATA PROTECTION POLICY

1 Introduction

- 1.1 The Royal Sussex Regimental Association Ltd (RSX RAL) needs to keep certain information about its directors, members, volunteers, clients, contractors, and agents to allow it to monitor (for example) performance, achievements, and health and safety. It is also necessary to process information so that RSX RAL can comply with its legal obligations and members and volunteers organised. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.
- 1.2 To do this, the RSX RAL must comply with the Data Protection Principles which are set out in the Data Protection Act 2018 (the 2018 Act). In summary these state that personal data shall:
- 1.2.1 Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met.
 - 1.2.2 Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
 - 1.2.3 Be adequate, relevant, and not excessive for that purpose.
 - 1.2.4 Be accurate and kept up to date.
 - 1.2.5 Not be kept for longer than is necessary for that purpose.
 - 1.2.6 Be processed in accordance with the data subject's rights.
 - 1.2.7 Be kept safe from unauthorised access, accidental loss, or destruction.
 - 1.2.8 Not be transferred to a country outside the European Economic Area unless that country has equivalent levels of protection for personal data.
- 1.3 The RSX RAL and all staff or others who process or use personal information must ensure that they follow these principles at all times.

2 Status of this Policy

- 2.1 This policy does not form part of a formal offer membership or of a place for volunteers, but it is a condition of membership and volunteering that members and volunteers will abide by the rules and policies made by the RSRAL from time to time. Any failures to follow the policy can therefore result in disciplinary proceedings.

3 The Data Controller and the Designated Data Controllers



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- 3.1 The RSRAL as a company is the Data Controller under the 2018 Act, and the Directors are therefore ultimately responsible for implementation. However, the Designated Data Controller will deal with day-to-day matters.
- 3.2 The RSX RAL's Designated Data Controller is the Association Secretary.
- 3.3 Any member, volunteer, client, or other individual who considers that the Policy has not been followed in respect of personal data about himself or herself should raise the matter with the Designated Data Controller.

4 Volunteer Obligations

- 4.1 Members and volunteers must ensure that all personal data provided to the RSX RAL is accurate and up to date. They must ensure that changes of address etc. are notified to the Registry.
- 4.2 Members and volunteers who may from time-to-time process personal data as part of their activities must notify the Designated Data Controller and must comply with the guidelines for data collection and security as set out in the RSX RAL's Data Protection Code of Practice.

5 Data Security

- 5.1 Anyone holding personal data is responsible for ensuring that:
 - 5.1.1 Any personal data that they hold is kept securely.
 - 5.1.2 Personal information is not disclosed either orally or in writing or via web pages or by any other means, accidentally or otherwise, to any unauthorised third party.
- 5.2 Everyone should note that unauthorised disclosure is extremely serious.
- 5.3 Personal information should:
 - 5.3.1 Be kept in a locked filing cabinet, drawer, or safe; or
 - 5.3.2 If it is computerised, be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up; and
 - 5.3.3 If a copy is kept on a diskette or other removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.
- 5.4 Further information on data security is given in paragraphs 12–26 of the RSX RAL's Data Protection Code of Practice.



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6 Rights to Access Information

- 6.1 All members, volunteers and clients are entitled to:
- 6.1.1 Know what information the RSX RAL holds and processes about them and why.
 - 6.1.2 Know how to gain access to it.
 - 6.1.3 Know how to keep it up to date
 - 6.1.4 Know what the RSX RAL is doing to comply with its obligations under the 2018 Act.
- 6.2 This Policy document and the RSX RAL's Data Protection Code of Practice address in particular the last three points above. To address the first point, the RSX RAL will, upon request, provide all members and volunteers and other relevant users with a statement regarding the personal data held about them. This will state all the types of data the RSX RAL holds and processes about them, and the reasons for which they are processed.
- 6.3 All members, volunteers and clients have a right under the 2018 Act to access certain personal data being kept about them either on computer or in certain files. Any person who wishes to exercise this right should complete the Subject Access Request Form at Annex 2 and submit it to the Designated Data Controller (see above).
- 6.3.1 The RSX RAL aims to comply with requests for access to personal information as quickly as possible but will ensure that it is provided within one month, as required by the 2018 Act.

7 Subject Consent

- 7.1 In many cases, the RSX RAL can only process personal data with the consent of the individual. In some cases, if the data is sensitive, as defined in the 2018 Act, express consent must be obtained. Agreement to the RSRAL processing some specified classes of personal data is a condition of acceptance of a client onto any provided activity, and a condition of volunteering. For volunteering applications this includes information about previous criminal convictions.
- 7.2 The RSX RAL may ask for information about particular health needs of members. This is sensitive information. The RSX RAL will use this information to carry out welfare support or in the protection of the health and safety of the individual but will need consent to process this data.



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- 7.3 The RSX RAL may also ask for information about particular health needs of directors, members and volunteers, such as allergies to particular forms of medication, or any medical condition such as asthma or diabetes. The RSX RAL will only use this information in the protection of the health and safety of the individual but will need consent to process this data in the event of a medical emergency, for example.
- 7.4 Therefore, the application forms that all prospective directors, members, and volunteers are required to complete will include a section requiring consent to process the applicant's personal data.
- 7.5 A refusal to sign such a form will prevent the application from being processed.

8 Processing Sensitive Information

- 8.1 Sometimes it may be necessary to process information about a person's health, criminal convictions, race, and trade union membership. This may be to ensure that RSX RAL is a safe place for everyone, or to operate other policies. Because this information is considered sensitive under the 2018 Act, members, and volunteers where appropriate will be asked to give their express consent for RSX RAL to process this data. An offer of employment or a place may be withdrawn if an individual refuses to consent to this without good reason. More information about this is available from the Designated Data Controller.

9 Publication of Information

- 9.1 The names of Senior Officers of the RSX RAL or any other personal data relating to them will be published in the annual report and on the public web site when any statute or law requires such data to be made public.
- 9.2 Individual branches within the RSX RAL may make volunteer biographical details or other personal data available on their public web sites. It may also be the case that volunteers enrolled on certain tasks may produce web-based material containing personal data as part of their work. All such activities are set out in detail in paragraphs 27–31 of the RSRAL's Data Protection Code of Practice.

10 Retention of Data

- 10.1 The RSX RAL has a duty to retain some member, volunteer, and client personal data for a period of time following their departure from the RSX RAL, mainly for legal reasons, but also for other purposes such as being able to provide references and transcripts, or for financial reasons. Different categories of data will be retained for different



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periods of time. The exact details of retention periods and purposes are set out in Annex 1 to RSX RAL's Data Protection Code of Practice.

11 Conclusion

- 11.1 Compliance with the 2018 Act is the responsibility of all members of the RSX RAL. Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or to access to facilities being withdrawn, or even to a criminal prosecution. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Designated Data Controller.

12 Policy review

- 12.1 The lead role for this policy is the Chair of the Governance and Finance Committee. This policy shall be reviewed as often as is required by changes in circumstances, relevant statutory requirements, or contractual agreements. In the absence of any such requirement, the policy shall be reviewed in accordance with the RSX RAL's periodic policy review process. All changes shall be brought to the attention of branches.

13 Notification

- 13.1 The RSX RAL has one Register entry that can be examined on-line. It can be a criminal offence for the RSX RAL to obtain personal data that falls outside of the classes declared in these notifications or to process personal data for purposes that are not defined there.

14 Status

- 13.1 The status of this policy document, RSX DCP002-01 is APPROVED by the Board as of the 5 June 2023.