

Queen's Regimental Association Consolidated Data Protection Policy

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Principles

The Queen's Regimental Association (QRA) will comply with all data protection legislation that applies to it. In addition, it will abide by the key principles of data processing:

1. **Fairness** - data will only be processed with due regard for the rights of the data subject and for purposes appropriate to the functions of the QRA.
2. **Transparency** - the QRA will always clearly and directly inform data subjects about the data it stores and processes about them; it will respect the wishes of data subjects with regard to processing of their data and provide them with copies of that data on request.
3. **Security** - the QRA will take seriously its responsibilities as custodian of the data it holds about data subjects and ensure that this data is accessible only to those who require it.
4. **Timeliness** - the QRA will retain data only for so long as it is necessary.
5. **Accuracy** - the QRA will make all reasonable efforts to ensure that the data it holds is accurate and will respond in a timely fashion to requests for correction from data subjects.

Basis for processing

The QRA is a membership association; life membership was conferred on all soldiers who served in the Queen's Regiment. The QRA exists to provide ongoing service to its Members, including the distribution of news and information about the Regiment and its Members, the organisation of social and commemorative events and occasional fundraising in support of the foregoing. The QRA processes data about its Members (and in rare instances third parties as noted later) solely for these purposes and considers this processing to be required as part of its contractual obligations to its Members.

Any information published about Members will have been provided by the Member themselves for that explicit purpose and is therefore processed with the Member's consent.

Data catalogue

The core data of the QRA is stored in an online CRM system (see **Security of processing including data breach mitigation** below). This data includes:

1. Names (including previous names if supplied) and contact details (postal address, telephone number, email address) of the Member.
2. QRA branch where applicable.
3. Final rank, Battalion, Regimental Number and dates of service of the Member.
4. Notes on email, postal and telephone exchanges with the Member.
5. Records of outbound communication (e.g. email invitations, Journal postage) to the Member.
6. Flags and other internal data items to allow effective processing as described above.

There will also be email from, to and occasionally concerning the Member within the QRA email system (see below under **Retention policy**).

The QRA does not maintain paper records concerning data subjects. See also **Retention policy** below for details of processing of paper communications received.

Nature of processing

The QRA performs three main acts of processing:

1. The production of the Journal, an annual physical publication which is distributed to all Members by post. In addition to general information about the Regiment, news about Members is included in the Journal (see **Basis for processing** above). The Journal may include requests to contribute to the funding of QRA or other charitable activities.
2. The maintenance of the QRA website, which may also include news about individual Members (see **Basis for processing** above). The website may include information about contributions to the funding of QRA or other charitable activities.
3. The organisation of social and commemorative events, and the production of invitations to these events which will largely be sent by email. Such invitations may include requests to contribute to the funding of the event or to other charitable causes. See **Profiling** below for details of selection of Members for invitation.

Profiling

The QRA will on occasion use basic profiling tools to select a subgroup of Members to receive a communication; most often this will be based on geography in order to invite Members to an event that is local to them. Members are informed of this profiling in the Privacy Policy on the QRA website; as part of the invitation; in a specific update that was included with the 2018 edition of the Journal; and herein as this Policy is available to Members on request.

Retention policy

The QRA will retain the information listed in the **Data catalogue** above for the life of the Member, or until resignation, whichever is the shorter period (see **Data subject's rights to request cessation of processing** below). The following actions are taken in support of this policy:

1. Email and postal communication received from Members is retained only for as long as is required to fulfil whatever request is contained in the email. If the information in the email is of direct relevance to the ongoing activities of the QRA it will be transferred to the CRM. Once actioned, emails are securely deleted and postal communication is securely destroyed. Where Members contact the QRA by telephone, these calls are not recorded, and any notes taken are directly recorded into the CRM.
2. On the death of a Member, the Member's record in the CRM is flagged as deceased; information about the Member is transferred to the notes section of the CRM and the date of death is also recorded. The QRA notes that at the time of writing data protection regulations do not apply to the deceased.
3. On resignation of a Member, the Member's record in the CRM is purged except for name, final rank, Service Number, Regiment and Battalion (for identification to ensure that communication and processing are not reinstated in error) and the date of resignation is recorded. Records for resigned Members are also flagged to avoid inclusion in email and postal communication.

Data Subject Access Requests, rectification and erasure

The QRA provides contact information including email, telephone number and postal address to which Members may address **Data Subject Access Requests** (DSARs) and requests for rectification and erasure of data.

DSARs will be met by provision of this document, combined with a complete extract from the CRM of all data fields relating to the data subject. This output may be redacted before transmission to the data subject in order to remove references to other data subjects where required. There will also be a search of the QRA

email and physical filing systems to ensure that any email or postal communications that have not yet been processed in accordance with the **Retention policy** set out above are included in the disclosure. DSARs will be processed without undue delay and in any case within one month, and without charge.

Rectification requests will be carried out without undue delay and in any case within one month, and without charge. The QRA reserves the right to refuse a rectification request where it has reasonable grounds to believe that the change requested is itself inaccurate and will inform the data subject if this is the case and provide a suitable route for appeal.

Erasure requests will be carried out without undue delay and in any case within one month, and without charge. The QRA reserves the right to refuse an erasure request if the requested erasure would prevent the QRA from adequately discharging its obligations as set out above in the **Basis for processing**. In these circumstances the data subject will be reminded of the **Data subject's rights to request cessation of processing** as set out below.

Data subject's rights to request cessation of processing

The data subject shall have the right to request cessation of processing in the following ways:

1. By resignation from the QRA. This shall have the effects set out in the **Retention policy** above and shall result in a complete cessation of processing of any kind save that necessary to exclude the data subject from any future communication or accidental reinstatement
2. By reduction of scope. The data subject shall be able to elect:
 - a. Not to receive the printed Journal
 - b. Not to receive electronic communication including invitations to events
 - c. Not to receive telephone communication from the QRA

Such reductions of scope shall be by means of applying flags in the CRM; accordingly, the only option for Members who do not wish to be profiled will be to resign from the QRA as set out above.

Privacy and Electronic Communications Regulation compliance

The QRA believes that electronic and telephone communication with Members does not require explicit consent as all communication from the QRA is part of its provision of service to Members. Nonetheless as noted in the Data subject's rights to request cessation of processing Members shall be given the option to opt out of receiving such communication should they so wish and will be reminded of that option in every electronic communication sent by the QRA.

Transfers of data and processing of third-party data

The QRA will not in the normal course of events transfer information about its Members to any third party except:

1. By virtue of having subcontracted the provision of its CRM to a third-party service provider; that service provider acting only as a data processor in this regard under the control and governance of the QRA.
2. By virtue of having subcontracted the development and maintenance of the website to a third-party service provider; that service provider acting only as a data processor in this regard under the control and governance of the QRA.

3. If required by law and subject to the provision of a suitably-constituted official request in accordance with the legislation applying at the time.

The QRA will also not in the normal course of events process information about natural persons (its own employees excepted) who are not Members.

However, the QRA may occasionally receive requests from Members for the contact details of other Members. Where the Member whose details have been requested is still alive and remains a Member, the QRA will request the consent of that party to provide the information. Where the Member is still alive but has resigned the request will be refused. If the Member is deceased and remained a Member at the time of their death, the QRA will, if it retains appropriate contact information, contact the Member's surviving relatives to request their consent to pass on their details to the requesting party. In no circumstances will any request for the provision of information be met without the explicit consent of the party whose information is being transferred.

Duties of the Data Controller

The QRA recognises its responsibilities as a data controller. This document sets out the ways in which the QRA seeks to comply with those duties. The QRA does not employ a Data Protection Officer as it does not believe one is required, but further information about the QRA and its data processing activities may be obtained from the Association Secretary.

Data processing impact assessment

The QRA has assessed the impact on data subjects of its processing and deems the risk from and impact of that processing to be minimal. Risks assessed include:

1. Failure to invite a Member to an event which they might have wished to attend.
2. Invitation of a Member to an event they are unable to attend - e.g. due to an error in the QRA's records with regard to geography
3. Failure to supply a Member with a copy of the Journal
4. Invitations or physical Journal sent to Members who have died without the QRA being aware, with the potential to cause emotional distress to surviving relatives
5. Inclusion in the Journal or in other communication of information about a Member which may embarrass the Member or which the Member did not wish publicised.

The QRA's approach to minimising these risks has been addressed in this document.

Data breach impact assessment

As noted in the **Data catalogue** the QRA's records include the personal contact details of data subjects in addition to anecdotal information including email and postal exchanges, details of their military service and in some cases information about their career after leaving military service. The QRA recognises that were this information to be disclosed beyond the QRA itself it could have deleterious consequences to Members, although the risk is not judged to be severe. Accordingly, it has taken the steps noted in **Security of processing including data breach mitigation** below to minimise the risk of any such disclosure.

Security of processing including data breach mitigation

As noted in the **Data catalogue**, the QRA uses a CRM system to contain the majority of its information. The CRM system selected, **Subscriber CRM** from **Dataware Consultancy Care Ltd**, is a system used by a large number of charitable organisations, many considerably larger and with data considerably more sensitive

than the QRA. **Dataware Consultancy Ltd** has given suitable assurances to the QRA of the security of the **Subscriber CRM** system. The **Subscriber CRM** data for the QRA is hosted within the United Kingdom on a secure **Ministry of Defence server**. The Association Secretary, authorised staff of RHQ PWRR and the website developer (see next paragraph) are the only persons with access to this database.

The development and maintenance of the QRA website is presently undertaken by an individual known to the QRA who has performed this work for a considerable period of time; has the trust of the QRA and is party to a service agreement including binding confidentiality provisions. Nonetheless both the arrangement for outsourcing of website development and the contractor for that arrangements are reviewed regularly to ensure that appropriate security is in place and that the arrangement remains appropriate. Note that any online access to the CRM system, e.g. for the updating of Member contact preferences or for membership sign-up, is not stored in any separate system.

The QRA has taken the steps noted under **Retention policy** above to mitigate the risk of data compromise from email. The QRA's email correspondence address with Members is used only for that purpose, is only accessible to the QRA's Association Secretary and is provided by Google. The QRA continually reviews the security of the email system to ensure that the selected provider remains appropriate. Emails from the database to donotreply@rhqpwrr.co.uk although all subsequent correspondence is from the QRA's Association Secretary Email, as noted in the above paragraph.

Policy review

This Policy is reviewed at least annually by the QRA's Association Secretary to ensure:

1. The policy is still relevant and required.
2. The policy continues to enable the QRA to comply with all applicable legislation.
3. The policy continues to meet the QRA's objectives in protection of its Information.
4. The policy incorporates and accounts for any changes that have been made to systems or software configuration.

The Data Protection Act 1998 was superseded by the European General Data Protection Regulation ("GDPR") on May 25th 2018, which was enacted within the United Kingdom by the Data Protection Act ("UKDPA"). The GDPR made a number of substantive changes to data protection regulations; this policy has been written insofar as it is possible to ensure compliance with both the Data Protection Act and the GDPR.

Signature

Policy approved for the QRA by:



Name: Colonel AAA Beattie

Title: President, The Queen's Regimental Association

Date: 15 June 2023