

# IWFM Volunteer Data Protection Policy

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## Purpose

The Institute of Workplace and Facilities Management (IWFM) and our associated partner organisations need to collect and use personal data, in order to operate and carry out our legitimate and business purposes. This policy provides information about data protection and the steps to be taken by IWFM volunteers who have access to the personal data of our members, staff, customers, suppliers and other volunteers.

## Policy Scope

This policy applies to all volunteers engaged in activities supporting and delivering IWFM's objectives; members of staff are required to abide by an equivalent policy. As IWFM is a UK-based organisation and subject to UK law, all those who work on behalf of IWFM are required to comply with the relevant standards, irrespective of which country they are operating from.

The policy applies to all data a volunteer may hold relating to identifiable individuals. This can be further segregated as personal data and sensitive personal data;

- Personal Data- Any information relating to an identifiable person who can be directly or indirectly identified. E.g. name, date of birth, address, identification number, location data or online identifier.
- Sensitive personal data - includes race, ethnic origin, politics, religion, trade union membership, genetics, health, sexual orientation

## General Data Protection Regulation

Data protection law across the EU - including the UK – is changing from 25th May 2018. This introduces new obligations that all organisations must comply with. The potential impact of non-compliance is significant fines of up to 4% global revenue.

To ensure compliance, the following data protection principles must be adhered to;

- Lawful, Fair, Transparent

Data must be processed lawfully, fairly and in a transparent manner in relation to individuals

- Purpose Limitation

Data should be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes

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- Data Minimisation

Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

- Data Accuracy

Data is accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay

- Storage Limitation

Data must be kept for no longer than is necessary to fulfil the purposes of which the personal data was processed

- Integrity and Confidentiality

Data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

- Accountability

The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

By following this Policy IWFM, and its volunteers will be able to meet their legal obligations and as such reduce the risk of reputational damage or financial penalty by the Information Commissioner's Office (ICO). The ICO is the UK body responsible for monitoring compliance with data protection law and can impose penalties on organisations that are found to be non-compliant.

## Policy

IWFM supports the need for volunteers to have access to relevant IWFM member data and for volunteers to send communications to IWFM members for administration purposes, to promote activities and events and to ask for member support at events.

To ensure IWFM meets its legal obligations under data protection, personal data usage and communications must adhere to the following:

- The Data Protection Policy must be reviewed and adhered to, prior to using IWFM personal data.
- Up-to-date data lists must be used for ALL new events, email campaigns, activities and ALL new support requests.
- All events must display a link to the [IWFM Privacy policy](#)

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- As delegate information will be used for future marketing purposes, an opt out option must always be provided (See page 3; Opt out Wording Requirements)
- Where volunteers plan on sharing the delegate list at an event for networking purposes, an opt out option must be provided to all individuals at the point of submitting their data. (See wording on page 3; Opt Out Wording Requirements)
- Volunteers can communicate directly with members who respond to requests for support in relation to an event or activity.
- All communication, unless to one individual, shall use the BCC function so individuals cannot see any other individuals email addresses/names.
- Following the event or activity, if the member agrees to take part in future events or activities, their names must be passed to [communications@IWFM.org.uk](mailto:communications@IWFM.org.uk) for inclusion on our internal database, and not stored on your own device or any other external systems.
- Any requests to amend contact information or opt out of further communications must be sent to both [membership@IWFM.org.uk](mailto:membership@IWFM.org.uk) and [communications@IWFM.org.uk](mailto:communications@IWFM.org.uk) so that this can be updated internally.
- Event delegates should only be communicated to via Eventbrite and not from personal email accounts.
- Volunteers cannot communicate to personal data lists on behalf of IWFM. (Any individuals who are believed to have an interest in IWFM products and services, should register their interest directly on our website)
- Any data storage, which may be necessary to carry out the above activities, must also comply with the following storage requirements:
  - Only data that is necessary and relevant to the current purpose should be requested from IWFM and stored for the period of time required to carry out the task.
  - Data should not be shared externally
  - Only data that is absolutely necessary to fulfil the purpose should be held.
  - Data may only be stored where sufficient safety measures have been taken to ensure security
  - Data can only be used for a purpose that is consistent with an individual's expectations
  - All data that has been superseded, shall be deleted
  - Always inform the Customer Experience team on [membership@IWFM.org.uk](mailto:membership@IWFM.org.uk) when you are notified of any data updates.

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- Access to the data should be strictly limited to IWFM staff and volunteers who have a valid business need to access the data.

## Disclaimers

The below disclaimers must be displayed on the event web page by volunteers when acting on behalf of IWFM in the following circumstances:

- Volunteer Events (EventBrite/RegOnline)

- Please note, this event is managed by the trusted volunteers of IWFM and is not managed internally at head office. Therefore, by submitting your data you acknowledge that this will be processed by our volunteers, who are bound by a code of conduct and the General Data Protection Regulation to use the data, only for the purpose(s) in which it has been submitted.

By inputting your data onto this form, you agree to sharing your data with IWFM. To understand how IWFM use your data and your rights relating to this, please see our Privacy Policy

- Photographs will be taken at this event. These images will be used for <INSERT PURPOSE> . However, if you would prefer not to be photographed, please contact <INSERT EVENT ORGANISER CONTACT INFORMATION>

- Emails (Please insert the below wording at the bottom of your email signature)

This email is sent on behalf of IWFM in relation to my role as a volunteer. Please be assured that the privacy of your data is extremely important to us and IWFM, and the contents of this email correspondence will be kept secure in compliance with the GDPR. Data will not be kept for longer than is required to fulfil the purpose.

The information in this email is confidential and solely for the use of the intended recipient(s). It may contain personal and confidential information and as such may be protected by the GDPR. Access by or disclosure to anyone other than the intended recipient is unauthorised. If you receive this email in error, please notify the sender and delete the email from your system immediately. In such circumstances, you must not make any use of the email or its contents. For information on how IWFM use data and your rights relating to this, please see the [Privacy Policy](#).

## Opt Out Wording Requirements

Please see wording below for questions that must be added to **ALL** events created on Eventbrite. Instructions on how to add an opt out option to your event can be found [here](#).

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- Marketing Opt Out

Your data may be used to contact you regarding future events that we feel may be of interest to you. If you do not wish to receive this data, please tick here.

Please note, you will still receive communications as per your preferences, to amend these, please visit the website

- Delegate List Opt Out

Your data will be included in a delegate list, distributed to all delegates prior to/during the event. If you do not wish to be included on the delegate list, please tick here.

## Data Breaches

An incident or data breach is when data is lost, stolen, inadvertently shared or damaged. All incidents and data breaches must be reported immediately to the Data Protection Officer at IWFM on 01279 712674 or [governance@IWFM.org.uk](mailto:governance@IWFM.org.uk), who will begin an investigation process and escalate where relevant.

IWFM will follow an agreed process on dealing with the incident and may be obliged to report it to the Information Commissioners Office and those individuals whose personal data has been breached. IWFM also expect that volunteers will report all *suspected* breaches and incidents as soon as they are identified.

## Queries and Comments

A member of staff will be able to assist you with any queries you have about data protection or obtaining access to IWFM data. If you have any queries regarding the Policy, please contact [governance@IWFM.org.uk](mailto:governance@IWFM.org.uk)

**This policy is subject to change dependant on changes in legislation or successor legislation; namely the forthcoming UK Data Protection Bill and to meet business requirements. Any updates or changes to the policy will need to be adhered to when acting on behalf of IWFM.**

## Contact us

Any queries about the contents of the policy please contact:

### Head of Governance

IWFM

1st Floor South

Charringtons House

The Causeway

Bishop's Stortford

Hertfordshire CM23 2ER

[governance@iwfm.org.uk](mailto:governance@iwfm.org.uk)