

BRIGHTON & SUSSEX MEDICO-CHIRURGICAL SOCIETY

DATA PROTECTION POLICY

Scope Of the Policy

This policy applies to the work of Brighton & Sussex Medico-Chirurgical Society (hereafter 'the Med-Chi'). The policy sets out the requirements that the Med-Chi has to gather personal information for membership and other purposes. The policy details how personal information will be gathered, stored, and managed in line with data protection principles and Data Protection legislation. The policy is reviewed on an ongoing basis by the Med-Chi Council members to ensure that the Med-Chi is compliant. This policy should be read in tandem with the Med-Chi's Privacy Policy.

Why This Policy Exists

This data protection policy ensures that the Med-Chi:

- Complies with data protection law and follows good practice.
- Protects the rights of members.
- Is open about how it stores and processes member's data.
- Protects itself from the risks of a data breach.

General Guidelines for Members

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members of the Med-Chi.
- The Med-Chi will provide induction training to staff members to help them understand their responsibilities when handling personal data.
- Staff members should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used, and they should never be shared.
- Personal data should not be shared outside of the Med-Chi unless with prior consent and/or for specific and agreed reasons.
- Member's information that we collect should be reviewed when this policy is changed. It is a condition of membership that members ensure their own information is kept up to date.
- Additional support will be support from the Council members where uncertainties or incidents regarding data protection arise.

Data Protection Principles

UK Data Protection legislation identifies 8 data protection principles:

Principle 1 -Personal data shall be processed lawfully, fairly and in a transparent manner.

Principle 2 -Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

Principle 3 -The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.

Principle 4 –Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.

Principle 5 –Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

Principle 6 -Personal data must be processed in accordance with the individuals' rights.

Principle 7 -Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Lawful, fair and transparent data processing

The Med-Chi requests personal information from potential members and members for the legitimate purposes of the Med-Chi. The forms used to request personal information will contain a privacy statement informing potential members and members where to find on why the information is being requested and what the information will be used for. We may also collect personal information in the course of communications between you and us (including by phone, email or otherwise).

The lawful basis for obtaining and processing member information is the Legitimate Interest of the Brighton & Sussex Medico-Chirurgical Society. In addition, members will be asked to provide consent for other specific processing purposes. The Med-Chi members will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once a Med-Chi member requests not to receive certain communications, this will be acted upon promptly and the member will be informed as to when the action has been taken.

Processed for Specified, Explicit and Legitimate Purposes

Members will be informed as to how their information will be used and the Council of the Med-Chi will seek to ensure that member information is not used inappropriately.

Appropriate use of the information provided by members will include:

1. Communicating with members about the Med-Chi's events and activities.

2. Communicating with members about other Med-Chi related events and activities.
3. Communicating with members about other third-party organisations which are charitable, educational or non-profit making organisations.
4. Communicating with members about their membership and/or renewal of their membership.
5. Communicating with members about specific issues that may have arisen during the course of their membership.
6. To share and use your details in connection with any meetings, events and social or other outings you attend as part of a Brighton & Sussex Medico-Chirurgical Society activity.
7. To monitor develop or improve the activities provided by the Med-Chi.
8. For administration, planning or management of the Med-Chi.
9. For use in spam traps and other cyber security measures to protect our computer systems and data.

The Med-Chi will ensure that staff members are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending Med-Chi members marketing and/or promotional materials from external service providers.

The Med-Chi will ensure that members' information is managed in such a way as to not infringe an individual members rights which include:

- The right to be informed
- The right of access
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

Photographs

Photographs are classified as personal data. Where group photographs are being taken please step out of shot if you do not wish to be in a photo or we will take it that you consent to be in the photographs which may be displayed in our updates and other publications, at Council meetings or on our website/ social media platforms.

Should a member wish at any time to have their photograph removed then they should contact the Secretary to advise that they no longer wish their photograph to be displayed.

Non-members

If you are not a member of the Med-Chi we will store and use your information to and until we resolve the matter with you. After we consider the matter resolved we will delete your personal information within 28 days.

Adequate, Relevant and Limited Data Processing

Members of the Med-Chi will only be asked to provide information that is relevant for membership purposes. This will include:

1. Title
2. Name
3. Department/Practice/Organisation
4. Correspondence address
5. Mobile number
6. Email
7. Subscription preferences

Where additional information may be required, this will be obtained with the specific consent of the member who will be informed as to why this information is required and the purpose that it will be used for.

Where the Med-Chi requires next of kin information as a one off for a particular event then the information will be deleted once that event has taken place unless it was to be required –with agreement –for a longer purpose.

There may be occasional instances where a member's data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or the Med-Chi in these instances where the Med-Chi has a substantiated concern, then consent does not have to be sought from the member.

Accuracy of Data and Keeping Data up to Date

The Med-Chi has a responsibility to ensure members' information is kept up to date. Members will be informed to let the Secretary know if any of their personal information changes.

Accountability and Governance

The Med-Chi Council is responsible for ensuring that the Med-Chi remains compliant with data protection requirements and can evidence that it has. For this purpose, those from whom data is required will be informed of what personal data we hold, our legal basis for holding it and how we use it. Where the legal basis is written consent, the evidence of this consent will then be securely held as evidence of compliance. The Med-Chi Council shall ensure that new members joining the Council receive an induction into how data protection is managed within the Med-Chi and the reasons for this. Council Members shall also stay up to date with guidance and practice within the Med-Chi movement and shall seek additional input from the Trustees

should any uncertainties arise. The Council will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

Secure Processing

The staff members of the Med-Chi have a responsibility to ensure that data is both securely held and processed. This will include:

- Staff members using strong passwords.
- Staff members not sharing passwords.
- Restricting access to or sharing of member information staff members who need to communicate with members on a regular basis.
- Using password protection on laptops and PCs that contain or access personal information.
- Using password protection or secure cloud systems when sharing data between Council members.

Subject Access Request

The Med-Chi members are entitled to request access to their own information that is held by the Med-Chi. The request needs to be received in the form of a written request to the Secretary of the Med-Chi. On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. The Med-Chi will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

Data Breach Notification

Were a data breach to occur, action shall be taken to minimise the harm by ensuring all members are aware that a breach had taken place and how the breach had occurred. The Council shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The President of the Med-Chi shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion would take place between the President and National Office as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The Council shall also contact the relevant Med-Chi members to inform them of the data breach and actions taken to resolve the breach.

If a Med-Chi member contacts the Med-Chi to say that they feel that there has been a breach by the Med-Chi, the Secretary will ask the member to provide an outline of their concerns. If the initial contact is by telephone, the Secretary will ask the Med-Chi member to follow this up with an email or a letter detailing their concern.

The concern will then be investigated by members of the Council who are not in any way implicated in the breach. Where the committee needs support or if the breach is serious, they should notify National Office. The Med-Chi member should also be informed that they can report their concerns to National Office if they do not feel satisfied with the response from the

Med-Chi. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Version No.	Date	Approved by	Approved on	Next Review
1	February 2025	Council, Brighton & Sussex Medico- Chirurgical Society	February 2025	February 2027