



GUILDFORD AND DISTRICT GROUP OF ADVANCED MOTORISTS GDPR POLICY

Introduction

The Guildford and District Group of Advanced Motorists (GAM) is a membership organisation and a road safety charity (no. 1051069), operating under the guidance and approval of IAM RoadSmart (IAM-RS), formerly called the Institute of Advanced Motorists (IAM). GAM trains members of the public so that they are ready to take the advanced driving test provided by IAM RoadSmart and promotes road safety activities in Guildford and the surrounding areas.

GAM has a legal duty to protect all personal information it processes and provide Members with information about the rights that they have in this regard. This Policy defines how GAM complies with the General Data Protection Regulation 2018 and IAM's Group Affiliate Handbook, v3.0, dated March 2019.

There are six lawful bases why any organisation may process personal data: at least one of these must apply whenever GAM ('we' or 'us') process your personal data:

- a) Consent: you have given clear consent for us to process your personal data for a specific purpose.
- b) Contract: the processing is necessary for a contract you have with us or that involves us, or because we have asked you to take specific steps before entering into a contract.
- c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
- d) Vital interests: the processing is necessary to protect someone's life.
- e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.

GAM holds and processes personal data because of the "Consent", "Contract" and "Legitimate Interest" lawful bases.

Responsibilities

GAM will treat all personal information as confidential; therefore, all Members of GAM who process personal data from any GAM or IAM-RS source are obliged to comply with GDPR 2018 when processing personal data for or on behalf of GAM.

Individual full Group Members of GAM may hold sufficient personal data personally to enable them to perform their role; for example:

- The GAM Treasurer will hold or have access to Group Members' personal bank details;
- The GAM Chief Observer and those on the Training Team may hold Observers' personal details and Observers' training records;



- The GAM Operations Manager and Non-Sunday Run Manager will hold some details of Associates and Observers who need to be matched with each other for Observed runs;
- The GAM Membership Secretary will hold contact details for all Associate Members, Group Members (including Honorary Members), Friends and the President;
- The GAM Committee may hold details of Members willing to assist at events or take part in events organised by GAM or IAM-RS.

Each Group Member of GAM who holds such data should ask themselves the following questions:

1. Is there a legal or contractual requirement to keep this information or document for a set period?
2. Has the information come to the end of its useful life?
3. Would the information be likely to be needed in the case of any legal proceedings? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
5. Is the document of historic or statistical significance?

If the decision is made to keep the data, this should be referred to the Group Data Manager and reasons given.

Data Controller and Processor

All members of GAM, whether they be Associate Members or Full Group Members, must first be an Associate or Full Member (respectively) of IAM-RS. Therefore, IAM-RS is the Data Controller for personal data for these classes of membership, storing data on their databases. They hold a 'contract' with the individual, by way of Associate or Full membership respectively, of IAM-RS.

Because GAM membership is wholly dependent upon IAM-RS membership, Members contract primarily with IAM-RS and have the Option to Withdraw from specified activities. GAM is therefore the Data Processor for Associate and Full Group Members of GAM.

GAM will contact the IAM-RS Area Service Delivery Manager in the event of receiving queries relating to data held by IAM-RS.

However, GAM also holds personal data for other individuals who can be Group Friends, Group President or individuals who are assessed using the Public Assessment Drive procedure. In this instance, GAM is the Data Controller.

Where possible, GAM will use templates from the ICO, which can be found at <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/documentation/>



Group Data Manager

GAM will appoint a Group Data Manager (GDM) who will ensure records of all personal data used by the Group are:

- Accurate;
- Held securely;
- Used in accordance with GDPR 2018;
- Destroyed when no longer required.

The GDM will also:

- Report any breaches in Data Protection to IAM-RS and the Information Commissioner's Office (ICO);
- ensure the correct GDPR notices are included in all Group communications to Members;
- manage any requests to withdraw consent;
- review the relevance of historical data.

The terms of reference for this role are described in the IAM-RS Group Affiliate Handbook, Appendix 4. The default position is that the Charity Trustees (the Officers) of GAM have the role of Data Manager.

The GAM Group Data Manager may be contacted through datamanager@guildford-iam.org.uk or by calling 07706 930315.

Personal Data Held by GAM

The personal data that GAM controls and processes is shown in Appendix B.

GAM will either ask Members for their consent to hold the personal data, or the data will be needed because Members have willingly chosen to enter into a contract with IAM-RS and then GAM.

GAM may retain some personal data because, for example, of the need to process payments for membership, or maintain records of qualified Observers, or meet the requirements of the Charities Commission or IAM-RS.

Storage Method

Selected GAM committee members will be granted password-protected access to the IAM-RS Membership electronic database.

GAM uses its own dedicated Microsoft 365 account to store records electronically, for both short- and long-term use. Access to this account is authorised electronically and is limited to specified committee members.



GAM will store all personal data securely; when stored electronically, it shall be password protected with a strong password; any portable devices (e.g. memory sticks) shall be encrypted.

Paper records shall be stored securely at nominated locations amongst GAM committee members. The records kept by named Members shall be declared and occasionally reviewed for relevance.

Photographs

GAM may take photographs at GAM organised events for the purpose of marketing; these are not covered by GDPR unless accompanied by information that could identify an individual, such as a name. GAM will never publish photographs from which an individual could be identified without asking the individual's permission first.

Retention Period

GAM will retain personal data for a limited period after the last contact with an individual as defined in the table in Appendix B, or as required to fulfil legal obligations.

Sharing Information

GAM will only pass personal data to third parties in the following circumstances:

- A Member has provided their explicit written consent for GAM to pass their data to a named third party; or
- where GAM use a third party purely for the purposes of processing data on their behalf and GAM have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors, e.g. processing a donation payment; or
- legal requirements.

GAM will not transfer personal data outside the UK.

GAM will not sell personal data or provide it to or share it with any third party other than for the explicit processes described above.

GAM will record any information shared, who it is shared with and why. All stored personal data will be securely destroyed once it is no longer required for the declared purpose.

Destroying Information

GAM will use the IAM-RS template Contract Statement, shown in Appendix A, which will be sent to all new members and will be used annually with all Group membership renewals.



GAM will destroy personal information by either deleting it electronically in GAM's Microsoft 365 account or shredding paper documents, or by anonymizing the data, meaning that it no longer continues to be personal data that will identify an individual.

GAM will destroy all records created by or processed by GAM that are required to be destroyed after a period of time or following a specific event, for example relating to expired or lapsed members.

GAM's GDM will ensure that all data destruction is performed in a timely manner.

Members' Rights

GAM Members and other individuals have rights under GDPR legislation. A summary is given here and full details can be found on the website of the Information Commissioner's Office <https://ico.org.uk/>

Individuals have the right to request:

- Details of the information GAM holds about them;
- that GAM updates or corrects any information they hold about them;
- that GAM delete the personal data it holds about them.

To do this, individuals must contact the GDM. The GDM will respond to the request within 30 days of receiving the written request.

If GAM Members exercise their option to withdraw from specified communications, GAM will hold a master copy of the request and a record of those who have taken the Option to Withdraw. Withdrawals will be actioned and confirmed by the GDM and stored for reference.

Next of Kin Details

GAM may hold Next of Kin details for the welfare of Observers. Where Next of Kin details are provided, it is the responsibility of the Observer to ensure the person named is aware and gives consent for GAM to hold and use them.

When the need to have this information ceases (when the individual is no longer an Observer), the GDM will arrange for it to be destroyed.

Observer Portfolios

As part of the training, certification and ongoing development of Observers at all levels, GAM and IAM keep certain details of those members who have requested to be part of the Observer community.

GAM will only keep personal data relating to anyone involved with Observed runs for on-going Observer development or proof of competence.



GAM will desensitise Observer's portfolios which contain 'run sheets' from past Associates or other candidates so the Associate cannot be identified.

GAM will return the training portfolio to the Observer once they cease to be in that role, and any records held in relation to this will be destroyed.

Associate Run Sheets and Drive Check Assessments

Associate run sheets normally remain in the IAM-RS Associate Handbook which remains the property of the Associate. Drive Check and other ad-hoc assessments will be recorded on sheets that are retained by the individual partaking in the process.

GAM Observers, committee members or volunteers may keep copies of Associate run sheets for group performance or Observer training reasons, but:

1. They will be desensitised to remove all personal data;
2. Originals will be returned to the Associate or the Associate informed that the information has been destroyed once their use is no longer deemed necessary.

Policy Review

The GAM Committee will review this Policy prior to each Annual General Meeting. A copy of the GAM privacy statement will be maintained on GAM's website and access to the fully GDPR Policy will be available on application.

Information Commissioner's Office (ICO) Registration

GAM will maintain annual registration with the ICO for data processing purposes and pay the annual fee as required by Direct Debit.

G J Farquharson - Chairman – Guildford & District Advanced Motorists – August 2020





Appendix B

The tables below describe GAM’s Policy regarding personal data. The GAM website uses ‘cookies’ to track website usage but does not track IP addresses. Electronic storage of data is arranged through commercially available software, primarily Microsoft 365 and associated platforms.

Full Group and Associate Members’ Personal Data, including Honorary Members

What is stored	Why it is stored	How it is stored	Where it is stored	For How Long it is stored	Who “Processes” it
<ul style="list-style-type: none"> • Name • Membership number at IAM • Postal address • e-mail address • Telephone numbers • Payment details 	<ul style="list-style-type: none"> • Creation and administration of member database. • To provide member benefits (see list/GAM Rules). • To advertise events and other relevant information to Members. 	<ul style="list-style-type: none"> • Mostly Electronically • Occasionally paper for short term use 	<ul style="list-style-type: none"> • IAM’s database. • GAM’s Microsoft 365 account with data stored in the cloud. • Limited data may be stored on computers held by specific, authorised, GAM Full Group Members. • Paper documents are stored by the Secretary 	<ul style="list-style-type: none"> • Annually unless consent is withdrawn earlier • Lapsed members will be deleted after 18 months. • Until the data is no longer up-to-date. 	<ul style="list-style-type: none"> • GAM Officers and committee members • IAM HQ • Newsletter printer/distributor for name and postal address only



Observers' Additional Personal Data

What is stored	Why it is stored	How it is stored	Where it is stored	For How Long it is stored	Who "Processes" it
<ul style="list-style-type: none"> • Training and Qualification Records • Name and telephone numbers of next of kin (optional) 	<ul style="list-style-type: none"> • Record of training and qualification required by IAM and IMI. • Management of group Observer community by Chief Observer. • Creation and administration of Observer database. • Provision of observer benefits. • Advertising observer events and other relevant information. • Welfare of Observers 	<ul style="list-style-type: none"> • Mostly Electronically • Occasionally paper 	<ul style="list-style-type: none"> • IAM's database. • GAM's Microsoft 365 account with data stored in the cloud. 	<ul style="list-style-type: none"> • As long as Observer remains qualified. 	<ul style="list-style-type: none"> • GAM Chief Observer and Training Officer • IAM HQ • IMI (Institute of the Motor Industries for overall supervision of the Observer Accreditation Scheme)



GAM Officers and Committee Members' Additional Information

What is stored	Why it is stored	How it is stored	Where it is stored	For How Long it is stored	Who "Processes" it
<ul style="list-style-type: none"> Name e-mail addresses Telephone numbers 	<ul style="list-style-type: none"> Charity Commission Trustee responsibilities for up to 4 Officers GAM committee activities, meetings, AGM, etc. 	<ul style="list-style-type: none"> Mostly Electronically Occasionally paper 	<ul style="list-style-type: none"> IAM's database. GAM's Microsoft 365 account with data stored in the cloud. 	<ul style="list-style-type: none"> Valid only for duration of appointment, annually reviewed at AGM. 	<ul style="list-style-type: none"> GAM Officers and committee IAM HQ Charity Commission for registration of Officers

GAM Friends', President's and Non-Members' Personal Data

What is stored	Why it is stored	How it is stored	Where it is stored	For How Long it is stored	Who "Processes" it
<ul style="list-style-type: none"> Name Postal address e-mail address Telephone numbers Payment details 	<ul style="list-style-type: none"> Creation and administration of member database. To provide member benefits. To advertise events and other relevant information to Members. 	<ul style="list-style-type: none"> Mostly Electronically Occasionally paper 	<ul style="list-style-type: none"> GAM's Microsoft 365 account with data stored in the cloud. Limited data may be stored on computers held by specific, authorised, GAM Full Group Members. 	<ul style="list-style-type: none"> Annually unless consent is withdrawn earlier Lapsed members deleted after 18 months. 3 months after activity ceases (e.g. Free public drive check) or Friend resigns. 	<ul style="list-style-type: none"> GAM Officers and Committee Members Newsletter printer/distributor



Observed Runs Data

What is stored	Why it is stored	How it is stored	Where it is stored	For How Long it is stored	Who "Processes" it
<ul style="list-style-type: none"> • Training progress and comments • Which Observer allocated • Photo of run sheet 	<ul style="list-style-type: none"> • Allocation of observed runs and Observer • Record of training for IAM test 	<ul style="list-style-type: none"> • Mostly Electronically • Occasionally paper 	<ul style="list-style-type: none"> • GAM's Microsoft 365 account with data stored in the cloud. • Limited data may be stored on computers held by specific, authorised, GAM Full Group Members. 	<ul style="list-style-type: none"> • Anonymised data retained for historical purposes for 5 years. 	<ul style="list-style-type: none"> • Operations Manager • Non-Sunday Run Manager • Observers

Events Additional Information

What is stored	Why it is stored	How it is stored	Where it is stored	For How Long it is stored	Who "Processes" it
<ul style="list-style-type: none"> • Name • Membership number at IAM • Postal address • e-mail address • Telephone numbers • Payment details 	<ul style="list-style-type: none"> • Creation and administration of event database to permit dissemination of relevant information. 	<ul style="list-style-type: none"> • Mostly Electronically • Occasionally paper 	<ul style="list-style-type: none"> • GAM's Microsoft 365 account with data stored in the cloud. • Limited data may be stored on computers held by specific, authorised, GAM Full Group Members. 	<ul style="list-style-type: none"> • When the event is finished, or until all event activities (payment, etc.) are finalised. 	<ul style="list-style-type: none"> • GAM Officers and Committee Members • Ad-hoc event organisers under GAM committee control.



Personal Data NOT Held by GAM

GAM will not collect or hold data relating to persons under the age of 17.

GAM will not collect or process personal data for automated decision-making.

GAM will not request, collect, use, nor retain personal data such as Members':

- Driving licence number;
- Driving conviction information;
- Vehicle registration number, make or model;
- Vehicle insurance details;
- Number of years driving.