ILDS Data Handling Procedure

Date approved: July 2022
Due for review: July 2025

INTRODUCTION

These procedures should be read in conjunction with the Data Protection policy included in the staff and volunteer handbooks and also with Data Protection law. Such laws may differ according to the location of the identifiable individuals and the applicable jurisdiction. In the UK such laws include but are not limited to Data Protection Act 2018, The UK General Data Protection Regulation (UK GDPR) and the Privacy and Electronic Communications Regulations (PECR).

These procedures do not negate the need to apply common sense when considering the appropriate use of data, thus any circumstances not detailed below are not to be excluded from the rules of data protection. You should be mindful to protect personal data at all times and in all situations.

A clear desk approach is recommended to avoid accidently exposing unsecured personal data.

RESPONSIBILITY FOR DATA PROTECTION COMPLIANCE

The ILDS is not required to appoint a Data Protection Officer (DPO), but the Executive Director has lead responsibility for monitoring data protection compliance, working in partnership to inform andadvise the Trustees/Board members who have overall responsibility to ensure that the ILDS is compliant with UK GDPR and all other data protection requirements. This decision is kept under review.

LAWFUL BASES FOR PROCESSING PERSONAL DATA

Whenever we process personal data, we must first establish an appropriate lawful basis. In the case of employees, these will be both Legal and Contractual Obligations. We may on rare occasions use Consent. With volunteers we may process data in our Legitimate Interest. When we do this, we ensure there is an adequate balance between our interests and the fundamental rights and freedoms of our volunteers. A volunteer may object to such processing.

DATA BREACHES

In the case of a personal data breach being identified (as a result of by the personal data being used outside procedures for the collection and storage/disposal processes outlined below), the Executive Director will inform the ILDS Board of the data breach and of the action taken to address and rectify it.

SUBJECT ACCESS REQUESTS

Individuals have the right:

- To be informed;
- To object to processing activities;
- To have access to data stored about them;
- To rectification;
- To erasure;
- To restrict processing;
- To data portability;
- To question the outcome of, or not to be subject to, automated decision-making including profiling.

The ILDS Privacy Policy (see below) which is displayed on the ILDS website includes contact details

to request personal data and also information about how and why data obtained by the ILDS is processed.

TYPES OF DATA

Following a data audit carried out April 2018, the following data is held by the ILDS. This list will be regularly reviewed and updated on an annual basis.

- Bank / Building Society details
- CVs
- Emergency contact details
- Employee, Volunteer or Contractor References
- Employment files, including notes from appraisal and disciplinary meetings
- Personal contact details

The ILDS does not request or collect sensitive personal data as defined under the UK GDPR. If any sensitive personal data is provided to the ILDS in error, ILDS will notify the provider of the data and will securely dispose of it.

Bank / Building Society details

Collecting

Bank and Building Society details may be collected by the ILDS for the payment of grants, salaries and invoices. The ILDS should not be collecting bank details from individual or corporate donors. Anyone wishing to make a donation should be encouraged to use the online platform managed by Stripe. If they are unable to make an online donation they can request the ILDS Natwest Bank account details.

Storage and Disposal

Bank account details for payments to be made should be maintained within the online bank system under the category “payees”. Printed documents containing bank details, such as invoices, should be kept to a minimum and any printed materials stored in a locked cupboard. Any additional copies should be disposed of using red confidential waste bags. Electronic copies of invoices and grantee payment forms should be stored on the secure ILDS network drive. Duplicate copies should be avoided, and shortcuts utilised instead. Relevant files should be permanently deleted when a notification of a change or a request to remove is received.

Using

Bank and Building Society details should be used for the purpose of making agreed and approvedpayments only. Bank and Building Society details must never be shared with any other parties.

CVs

Collecting

CVs may be requested by the ILDS during times of recruitment either directly or via an agency, and may be unsolicited at other times.

Storage and disposal

All CVs should be stored electronically on the secure ILDS server within a password protected personnel folder. Unsolicited CVs should be stored for a period of 12 months and then permanently deleted. Paper copies of CVs, whilst forming part of a recruitment process, should be kept in a locked filing cupboard and, upon completion, immediately disposed of via the red confidential waste bags.

Using

Multiple copies of CVs may be made during active recruitment but no identifying or otherwise confidential details from the CV should be shared in part or in full with anyone external to the recruitment process.

Emergency contact details

Collecting

Emergency contact details are collected for current employees and volunteers.

Storage and disposal

It may be necessary to retain paper copies of emergency contact details in a specific emergency folder which should be stored in a secure location. An electronic copy should only exist in password protected personnel folders. There is no reason to retain this information once an employee or volunteer is no longer engaged with the ILDS, and thus all electronic and paper files should be disposed of immediately following the termination of their engagement with ILDS.

Using

Emergency contact details will only be used in the case of an emergency affecting the employee or volunteer.

Employee, Volunteer or Contractor References

Collecting

References will be requested only for employees and volunteers who are offered positions within ILDS. References will also be collected for potential contractors of large contracts who reach the final stage of selection.

Storage and disposal

There is no need to store paper copies of references. Electronic copies should be stored on the secure ILDS server, with personal references secured in a password protected folder.

Using

References will be retained for staff, volunteers and contractors for the duration of their employment/connection with the ILDS and for up to six months thereafter. This is the period of time duringwhich a discrimination claim could be brought against the organisation.

Employment files, including notes from appraisal and disciplinary meetings

Collecting

Data such as employees' personal records, performance appraisals, employment contracts, etc. should be retained for 6 years after they have left from the end of the financial year in which they worked. In practice, this could be up to 7 years. This is partly because of potential tribunals forthe 3-year risk period during which terminated employees can bring a claim, but it could be usedfor defending a county court or high court claim, which can occur many years down the line. Underthe UK GDPR, the condition for processing would be Legal Obligation, or Legitimate Interest.

Storage and disposal

All employment data should be stored electronically on the secure ILDS server within a password protected personnel folder. Any hard copy of employment data, which cannot be stored electronically, should be kept in a locked filing cupboard and immediately disposed of via the red confidential waste process once no longer required.

Data relating to PAYE, maternity pay or SMP (statutory maternity pay) need only be kept for 3 years after an employee leaves, as that is how long HMRC may be interested in the information for conducting reviews or audits.

Using

The information will be used for purposes of employment only and will include record of the induction process, training and appraisal reviews, sick leave and absence records.

Personal contact details

Collecting

For ILDS volunteers, including nominees, current and past Board and committee members, personal contact details such as name, age, home and work address, emails, CVs, organisational membership and roles are collected.

Storage and disposal

This information may be stored in hard copy in lockable filing cupboards and also online and accessed by password. The information will be deleted/disposed of securely after the end of the individual's term of office.

Using

This data is used for ILDS processes including the nomination, appointment and election (where required) of officers, Board member and other positions required for the running of the organisation only.

Sensitive personal data

Under UK GDPR, for data to be classified as sensitive personal data, it must fall into one or more of the following

categories:

1. The racial or ethnic origin of the subject;
2. The subject's political opinions;
3. The subject's religious beliefs or beliefs of a similar nature;
4. Whether the subject is a member of a trade union;
5. Information on the subject's physical or mental health condition;
6. Information on the subject's sexual life;
7. The commission or alleged commission of an offence by the data subject; and
8. Information relating to the commission or alleged commission of an offence by thedata subject.

The Special Categories now specifically includes Biometric Data and Genetic Data where processed to uniquely identify an individual (e.g. fingerprint payment systems). This is not currently applicable to the ILDS.

Collecting

Sensitive personal data as defined under the GDPR is not required by the ILDS as part of its role as a membership organisation for dermatological societies and is not collected or requested.

Storage and disposal

If any personal data is provided to the ILDS in error, ILDS will notify provider of the data and will and securely dispose of it.

THE ILDS PRIVACY NOTICE (November 2021)

The ILDS website displays Privacy Notice (updated November 2021). The following are extracts from that Notice:

"We are committed to protecting your personal data and complying with Data Protection law wherever you may reside or where your organisation is established. The ILDS privacy policy outlines the type of information that is collected by us and how we use and protect it. This statement also outlines your rights regarding data protection and advises you how to contact us.

We consider most of processing activities to be business related. However, we acknowledge that personal data will be processed. Therefore, this policy applies to both the organizational data of members as well as the personal data of their staff and representatives.

We may change this Policy from time to time so please check up[dates to this page occasionally to ensure that you are happy with the changes."

Personal data and its uses – the data we collect and why

When referring to "personal data", we mean information we collect from you, from which you may be personally identified. This includes your title, name and email address. We will not collect any personal data from your visits to our site unless you provide this information voluntarily.
When you supply personal data to us through this website, it will be clear what we plan to use the data for and, in some instances, we will seek your permission for such use and only use it in the capacity described.

Answering your queries

You may use a contact form (where provided) in order to ask questions about us and our services. When using the contact form, you will be asked to provide personal data such as youyr name and email address and a message you want to deliver to us. You may also contact us by writing to us directly by email where we have provided a specific email address. We may use such information to get in touch with you or to reply to your message.

Website hosting

This website is hosted in the United Kingdom by a dedicated hosting organisation. The hosting organisation is contractually bound to implement measures to help protect your personal data and not to process such data except in accordance with our instructions. Any future hosting organisation used in relation to this site will be similarly bound.

Security

When you give us personal information we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software: 128 Bit encryption on SSL. When you are on a secure page a lock icon will appear at the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address, etc) are transmitted normally over the Internet and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential.

Use of web tags

Our website pages contain electronic JavaScript code snippets known as web tags that allow us to count users who have visited these pages. Web tags collect only limited information which includes a cookie number, time and date of a page view, and a description of the page on which the web tag resides. These web tags do not carry any personally identifiable information and are only used to track the effectiveness of the website. Because web tags are the same as any other content request included in the request for a web page, you cannot opt-out or refuse them.

Your rights

Under data protection law, your rights include but may not be limited to:

- A right to withdraw your consent to the processing of your personal data to which you havepreviously consented;
- A right to obtain a copy of the personal data which we hold about you (we reserve the right to charge a small fee for the exercise of this right);
- A right to object to the processing of your personal data for the purpose of direct marketing;
- A right to have incorrect data we hold about you corrected; and
- A right to have your data erased from our records. If you request this we may not be able to erase your data if we have a legal or contractual purpose for retaining it.

Charity Information

ILDS is a registered charity (no. 1111469) and company limited by uarantee (no. 5466148). Place of Registration: England and Wales

The registered address is: The International League of Dermatological Societies, Willan House, 4 Fitzroy Square, London W1T 5HQ, England

Donation Refund Policy

We are not usually able to give refunds for donations but if you have made a donation in error, please contact us as we may be able to refund the donation less any charges we have incurred. Please email info@ilds.org with your name, address and transaction reference. Please ensure you contact us within 14 days of the donation being made.

Contact points

Any questions regarding this Policy and our privacy practices should be sent by email to info@ilds.org or by writing to ILDS, Willan House, 4 Fitzroy Square, London, W1T 5HQ. Alternatively you can telephone +44 (0)20 7388 6515.

If you would like to complain or have aconcern about the way we process your datat, you should initially contact us by emnail at info@ilds.org. You also have the right to complain to the Regulator of Information Rights. If you are in the UK, this is The Information Commissioner's Office (ICO). Here is a link to their website: https://ico.org.uk/make-a-complaint/. If you are located outside of the UK you will need to consult with your local data protection regulator.