

**Cymdeithas Grefyddol  
y Cyfeillion (Crynwyr)  
yng Nghymru a'r  
Gororau**

**Cymar**

**The Religious Society  
of Friends (Quakers) in  
Wales and the Marches**

**C**

**Charitable Incorporated  
Organisation**

**Q**

**Registered charity number:  
1207878**

## **Data Protection Policy and Procedures**

Date approved by trustees: 2024.10.10

Date received by AGM:

Date reviewed:

## 1.0 Introduction and Contact Details

**Name:** The Religious Society of Friends (Quakers) in Wales and the Marches - Cymdeithas Grefyddol y Cyfeillion (Crynwyr) yng Nghymru a'r Gororau (CIO) known as Cymar.

**Address:** Swansea Quaker Meeting House, Pagefield House, Page Street, Swansea, SA1 4EZ

**Email:** *(Insert generic email address when known)*

This policy covers all parts of the charity covered by the constitution of The Religious Society of Friends (Quakers) in Wales and the Marches - Cymdeithas Grefyddol y Cyfeillion (Crynwyr) yng Nghymru a'r Gororau CIO (Cymar) and includes Crynwyr Cymru - Quakers in Wales, and the associated Area Meetings, Local Meetings, its properties and its employees.

It should be read in parallel with the Risk Register and the Memorandum of Understanding (MoU) between the Cymar Trustees, Crynwyr Cymru - Quakers in Wales (CCQW), Area Meetings (AMs) in Wales and the Marches, and Local Meetings (LMs) as agreed and with reference to the current version Quaker faith & practice (QF&P) (online); the Book of Christian Discipline of the Religious Society of Friends (Quakers) which includes Advices and Queries.

## 2.0 Principles of Intent and Practice

Cymar Trustees are committed to protecting all information about Friends that is handled within the associated Area Meetings, Local Meetings and Crynwyr Cymru - Quakers in Wales, both in digital and printed formats, and to respecting people's rights around how their information is handled. This policy explains our responsibilities and how we will meet them.

## 3.0 Policy

(There is a Glossary of Terms at the end of this document.)

### 3.1 Policy statement

3.1.1 Cymar is committed to protecting personal data and respecting the rights of our Data Subjects: the people whose personal data we collect and use within Cymar and our constituent bodies. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and adopting good practice.

We process personal data to help us:

- Maintain our Cymar Register of Members
- Maintain our AM lists of members and regular attenders.
- Provide pastoral support for members and others connected with us.
- Safeguard children, young people and adults at risk.
- Recruit, support and manage staff.

- Maintain our accounts and records, this includes the processing of donations and the reclaiming of Gift Aid.
- Seek members/attenders to serve in appointments through the work of Nominations Committees.
- Respond effectively to enquirers and handle any complaints.
- For residential events we hold data relevant to the booking, e.g., contact details, dietary preferences, accessibility needs, workshop choices. This information may be shared as required by the residential centre but will not be widely shared amongst participants.
- Maintain employee information - which is covered separately by our Employee Privacy Notice

3.1.2 This policy has been approved by Cymar Trustees who are responsible for ensuring that we comply with all our legal obligations. It sets out the rules that apply whenever we obtain, store or use personal data.

### **3.2 Why this policy is important**

3.2.1 Trustees are committed to protecting personal data from being misused, getting into the wrong hands as a result of poor security or being shared carelessly, or being inaccurate, as we are aware that people can be upset or harmed if any of these things happen.

3.2.2 This policy sets out the measures that Cymar is committed to taking as an organisation, including the measures to be taken within our constituent bodies and what each of us will do to ensure we comply with the relevant legislation.

3.2.3 In particular, we will make sure that all personal data is:

- Processed lawfully, fairly and in a transparent manner
- Processed for specified, explicit and legitimate purposes and not in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary for the purposes for which it is being processed
- Accurate and up to date
- Not kept longer than necessary for the purposes for which it is being processed
- Processed in a secure manner, by using appropriate technical and organisational means
- Processed in keeping with the rights of data subjects regarding their personal data.

### **3.3 How this policy applies to you & what you need to know**

3.3.1 Before you collect or handle any personal data as part of your work for Cymar, or its constituent bodies, it is important that you take the time to read this policy carefully and understand what is required of you, as well as the organisation's responsibilities when we process data

3.3.2 Our procedures will be in line with the requirements of this policy, but if you are unsure about whether anything you plan to do, or are currently doing, might breach this policy you must first speak to the Data Protection Officer, who will be a trustee.

3.3.3 Our Data Protection Officer is responsible for advising Cymar and its constituent bodies about their legal obligations under data protection law, monitoring compliance with data protection law, dealing with data security breaches and with the development of this policy. Any questions about this policy or any concerns that the policy has not been followed should be referred to the Data Protection Officer.

3.3.4 As a Data Subject of Cymar, or its constituent bodies, we will handle your personal information in line with this policy.

3.3.5 As a member or attender processing personal information on behalf of Cymar, you are required to comply with this policy. If you think that you have accidentally breached the policy it is important that you contact our Data Protection Officer immediately so that we can act promptly to try and limit the impact of the breach.

3.3.6 As a clerk/convenor of a Local Meeting, Area Meeting, CCQW or Cymar committee you are required to make sure that any procedures that involve personal data, which you are responsible for in your meeting or committee, follow the rules set out in this Data Protection Policy. See in particular 11.2 E.

#### **4.0 Training and guidance**

4.1 Trustees will provide general training as required to raise awareness of our obligations and responsibilities, as well as to outline the law.

4.2 Trustees may also issue procedures, guidance or instructions from time to time.

#### **5.0 What personal information do we process?**

5.1 The Area Meetings of Wales and the Marches collect and process information (personal data) about members and regular attenders. This data is collected from forms completed by members and attenders and by new members and attenders when they first request to be included in the various Area Meetings' Lists of Members and Attenders.

Information is also processed by the Clerking Teams of the Area Meetings of Wales and the Marches from forms relating to the transfer of membership from another Area Meeting into or out of the Area Meetings of Wales and the Marches. The data is processed in accordance with the guidance followed by those in our constituent bodies by the role holder(s) who process data about our members and attenders on behalf of the Area Meeting. (A number of different role holder names are used and tasks are divided in different ways in different Area Meetings).

5.2 Friends who apply for membership are visited by two Friends appointed by the appropriate Area Meeting. A report of the visit is prepared jointly by the visitors and the applicant. This report is presented to the gathered Area Meeting and a decision on entry into membership of the relevant Area Meeting is made. The reports of the visits are stored for archiving in a separate envelope file marked confidential. Permission to access this file must be sought from the Area Meeting Clerks. All Area Meeting files are archived at the County Archive relevant to that Area Meeting. (see archiving Section 10). Following presentation of the report, the visitors are required to destroy/hide their copies.

5.3 Cymar and its constituent bodies collect information relating to Disclosure and Barring Service (DBS) checks relating to those working with children and young

people and adults at risk. We will not hold information relating to criminal proceedings or offences or allegations of offences unless there is an overarching safeguarding requirement to process this data for the protection of children and adults who may be put at risk in our meetings. This processing will only be carried out on advice from the Cymar Safeguarding Coordinator and the various Area Meetings Deputy Safeguarding Coordinators. Issues involving Safeguarding matters will take precedence over Data Protection guidelines.

5.4 Cymar and its constituent bodies Nominations Committees may process data regarding members/attenders who are being considered for nomination to serve in Quaker roles or on Quaker appointed bodies.

5.5 Trustees of Cymar will apply this Data Policy to all information gathered in the process of assessing candidates for any role as an employee of the CIO and will delete all data acquired when no longer relevant.

5.6 Suppliers & Payees' details – addresses, email addresses, bank sort codes and account numbers are held on the Cymar, and constituent bodies', online banking facilities, as well as records of payments to them. Access to these records is limited to bank signatories using the usual logon security procedures, but will not be subject to the same legal protection as the types of data listed above.

## **6.0 Making sure processing is fair and lawful**

6.1 Processing of personal data will only be fair and lawful when the purpose for the processing meets a legal basis, as listed below, and when the processing is transparent.

This means Cymar will provide people with an explanation of how and why we process their personal data at the point we collect data from them, as well as when we collect data about them from other sources.

6.2 Processing of personal data is only lawful if at least one of these legal conditions, as listed in Article 6 of the General Data Protection Regulation GDPR, is met:

- The processing is necessary for a contract with the data subject.
- The processing is necessary for us to comply with a legal obligation.
- The processing is necessary for the protection of children and adults.
- The processing is necessary for legitimate interests pursued by Cymar

Unless these are overridden by the interests, rights and freedoms of the data subject. If none of the other legal conditions apply, the processing will only be lawful if the data subject has given their clear consent.

6.3 If personal data is collected directly from the individual, Cymar will inform them in writing about our identity, contact details and those of the Data Protection Officer, the reasons for processing, how long the data will be stored and the data subjects' rights. This information is commonly referred to as a 'Privacy Notice' and this information will be given at the time when the personal data is collected.

## **7.0 When we need consent to process data**

7.1 Where none of the other legal conditions apply to the processing and Cymar and its constituent bodies are required to get consent from the data subject, they will clearly set out what is being asked for, including why the data is being collected and

how it is planned to be used. Consent will be specific to each process Cymar and its constituent bodies are requesting consent for and will only be asked when the data subject has a real choice whether or not to provide us with their data. As an example, consent must be acquired before individuals are added to any email circulation list, and their details must be removed when they request this. See 11.2E below.

7.2 Consent can be withdrawn at any time and if withdrawn, the processing will stop. Data Subjects will be informed of their right to withdraw consent and it will be as easy to withdraw consent as it is to give consent.

## **8.0 Data will be adequate, relevant, accurate and not excessive**

8.1 Cymar and its constituent bodies will only collect and use personal data that is needed for the specific purposes described above (which will normally be explained to the data subjects in privacy notices). We will not collect more than is needed to achieve those purposes and will not collect any personal data “just in case”.

8.2 Cymar and its constituent bodies will ensure that personal data held is accurate and, where appropriate, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on.

## **9.0 Keeping data, amending and destroying it**

9.1 Cymar and its constituent bodies will not keep personal data longer than is necessary for the purposes for which it was collected. See Archiving 10.0 below.

9.2 Information collected by the Data Consent Forms, completed by Friends will be retained until we are requested to amend or delete by the Friend concerned. Requests to amend or delete the information relating to email information should be made to the relevant Assistant Clerk Membership, as detailed in the current List of Members and Attenders for the Area Meeting. The Data Protection Officer will ensure that these requests are carried out.

9.3 The Data Protection Officer will keep records of all requests to amend or delete data.

## **10.0 Archiving**

10.1 Certain records of Cymar and its constituent bodies, including membership records, minutes, annual accounts, newsletters, and other documents, are retained permanently, both to enable the continued functioning of the Meetings and for historical and research purposes. Such archive records are held securely, whether in the custody of the Meetings or in an appropriate repository, with access strictly limited, including by a lengthy closure period commensurate with their degree of confidentiality. (See the Cymar Right Keeping of Records Policy and Procedures and related Retention Schedule)

## **11.0 Security of personal data**

11.1 Cymar will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage.

11.2 Cymar will implement security measures which provide a level of security which is appropriate to the risks involved in the processing. Measures will include technical and organisational security measures.

- The Data Consent Forms will be held securely by the relevant Assistant Clerk Membership and only used for the specific purpose they were collected for.
- Electronic files relevant to the list of members and attenders and to membership matters will be held on the (*constituent bodies Google Drive/Dropbox/etc*) accessible only by the appropriate people. This will generally be the assistant clerk(s) (membership) for that Area Meeting.
- Data relating to DBS checks will be retained in secure storage by the relevant Safeguarding Teams.
- Friends in possession of a paper copy of the Area Meetings of Wales and the Marches Lists of Members and Attenders and will be reminded, via written guidance in the List and also by reminders via the Area Meetings Clerking Teams, of the duties and responsibilities of holding and using the List.
- Email: When sending emails to a number of members and attenders, care will be taken to ensure that the list contains only those who have agreed to be included on the Members and Attenders Contact list, or those who have given their written consent to be included in a particular list. Where lists contain other email addresses, we will use blind-copy procedures to prevent email addresses being circulated to other recipients. Any member/attender can request to have their email only used as Bcc. [One way of doing this is for the sender to create an email address called 'Undisclosed Recipients', send the email to be circulated to this address, then put all other intended recipients into the Blind Copy (Bcc) line.] No personal information will be used on mailings with mechanisms such as Google Groups. For any emails sent out, it is recommended that the following is added at the bottom of the email 'If you do not wish to receive these emails, please contact the sender and ask to be unsubscribed from this list', at least periodically.
- The effectiveness of these security measures will be checked on a regular basis. The Data Protection Officer will, on an annual basis, contact all the relevant Role Holders in the Area Meetings concerned and all Local Meeting Clerks to remind them of their duties under the General Data Protection Regulation and to confirm that they are in compliance. This will form the basis of an annual report to both the Trustees and to the Area Meetings.
- LM Clerks will also be required to remind their Meetings of the individual's responsibilities under this Data Protection Policy on an annual basis.
- Third party suppliers used to store and process data will be approved by the Trustees as to GDPR compliance. Approved suppliers will be listed in Section 13.0 of the document.

## **12.0 Dealing with data protection breaches**

12.1 Where Friends think that this policy has not been followed, or data might have been breached or lost, this must be reported immediately to the Data Protection Officer

12.2 Trustees will keep records of personal data breaches, even if we do not report them to the Information Commissioner's Office (ICO).

12.3 Cymar Trustees will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within 72 hours from when someone becomes aware of the breach.

12.4 In situations where a personal data breach causes a high risk to any person, Trustees will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay. This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

For urgent requests about how we use your data or to make a complaint please email Jeremy Brignal-Thorp, Data Protection Officer, (*insert generic email address*).

Alternatively, contact the Cymar clerk to trustees or your local meeting clerk.

If you wish to make a request in writing, please contact:

Cymar Data Protection Officer  
% Swansea Quaker Meeting House,  
Pagefield House,  
Page Street,  
Swansea  
SA1 4EZ

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office  
Page 10 of 12  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: <https://www.ico.org>

### **13.0 Approved Suppliers:**

Google Docs. Privacy Policy <https://policies.google.com/privacy?hl=en>

Dropbox. Privacy Policy <https://www.dropbox.com/privacy>

Wordpress. Privacy Policy <https://automattic.com/privacy/>

### **14.0 Glossary of Terms:**

the role holder(s) who process data about our members and attenders on behalf of the Area Meeting. (A number of different role holder names are used and tasks are divided in different ways in different Area Meetings).

**Data Subject** - the individual who is named or otherwise identifiable in the data in question.

**List(s) of Members and Attenders** - the booklets and/or electronic files produced annually listing Quakers in Wales and the Marches, Crynwyr Cymru - Quakers in Wales, and the associated Area Meetings role holders and contact details of all members and attenders at each local meeting (where consent has been granted).

**GDPR** - Refers to the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018.

**ICO - The Information Commissioner's Office** in the United Kingdom, is a non-departmental public body which reports directly to Parliament and is sponsored by the Department for Digital, Culture, Media and Sport (DCMS).

**Privacy Notice** - A privacy notice should identify who the data controller is, with contact details for its *Data Protection Officer*. It should also explain the purposes for which personal data are collected and used, how the data are used and disclosed, how long it is kept, and the controller's legal basis for processing.

#### **15.0 Referenced documents:**

15.1 Quaker faith & practice (Qf&p) fifth edition; the Book of Christian Discipline of the Religious Society of Friends (Quakers) which includes Advices and Queries.

15.2 Area Meeting Lists of Members and Attenders for those Area Meetings in Wales and the Marches

15.3 Risk Register and the Memorandum of Understanding (MoU) between the Cymar Trustees, CCQW, Area Meetings (AMs) and Local Meetings (LMs) agreed by all parties.

#### **16.0 Related Cymar Policies and other documents:**

16.1 Privacy Policy

16.2 Privacy Notices, Various

16.3 Record Retention Schedule

16.3 Area Meeting Membership guides

16.4 BYM Data Protection Handbook for Meetings