



## **The BABAO Record of Processing Activities**

This document outlines the current record of data processing and the measures that the BABAO committee will take to comply with GDPR regulations. It explains what data BABAO holds; who has access to it; who takes on the role of data controller and data processor; and why the data is processed.

### **The personal data that we currently hold on members includes:**

- Title
- Full name
- Address
- Postcode
- Country
- E-mail address
- Phone number
- Membership category
- Date joined/ year of joining
- Payment records (including date of payment, amount paid, and payment method)
- Areas of interest

### **Student members:**

- University affiliation
- Proof of student status

### **Waged members:**

- Occupation (job title/ position)
- Affiliation (place of work)

**This is information that members have supplied to the BABAO when they joined the organisation.**

These data are kept to:

1. maintain a record of who is a current member of the BABAO, to ensure they receive membership benefits. These include:
  - a) being subscribed to the BABAO mailing list (run by JISCMail – have their own GDPR regulations in force)
  - b) access to the members' area of the BABAO webpage
  - c) the option to apply for the BABAO small grants and bursaries
  - d) the option to register at a reduced rate for the annual conference
  - e) receipt of any BABAO publications (e.g. the Annual Review, and 'Trends' volumes)
  - f) allow student members to compete for the student podium and poster prizes at the BABAO annual conference
2. ensure that all people who wish to become or remain a member of the BABAO pay the appropriate membership fee for the current membership year (1<sup>st</sup> Jan – 31<sup>st</sup> Dec).
3. monitor the composition of our membership to ensure that we are meeting/addressing the needs of our members and furthering the aims of the organisation.

**ALL DATA THAT IS PROVIDED TO INDIVIDUAL TRUSTEES FOR PROCESSING IS TRACKED AND PERMANENTLY DELETED AFTER USE. DATA REMAINS IN THE SECURE DATABASE CONTROLLED BY THE MEMBERSHIP SECRETARY. WHEN DATA IS TRANSFERRED THIS IS DONE SECURELY WITH PASSWORD PROTECTION OR END-TO-END ENCRYPTION.**

## **How we use the personal information**

Individual trustees will have need to access membership data to fulfil the duties associated with their roles. They will submit a request to the Membership Secretary who will securely transfer the required data to the trustee. Only the data deemed necessary for the task will be transferred and it will be deleted promptly after the trustee has finished with it. All requests are recorded in a register that is monitored by the Membership Secretary and the Data Protection Lead (DPL). The DPL will close the data request after an appropriate amount of time having received confirmation that all data outside of the database has been securely disposed of.

When data is presented to the trustees in the form of a grants application, a quarterly report or one-off cases such as a complaint, it will be anonymised as much as is practical.

Listed below is each trustee role and the processing tasks they may carry out.

## ***Membership Secretary***

The Membership Secretary is BABAO's data controller and the primary data processor. Membership forms are sent to the Membership Secretary who processes and stores the data in a protected access database. Copies of the membership form are destroyed once the information has been inputted into the database.

The following information is currently kept by the Membership Secretary for the following reasons:

1. **Membership Number:** this unique identifying number is allocated when a new member joins the organisation. It is used to verify payment transactions made by bank transfer (members should provide this number and their name as the payment reference), and members are asked to provide it when applying for the BABAO small grants.
2. **Title, Name, Contact details (including postal address, email address and phone number):** kept to allow us to maintain contact with the members.
3. **Date Joined and Year of Joining:** to ensure that payments are made on time, and to monitor how and when we are attracting new members.
4. **Membership category:** used to check that members are paying the correct subscription fee.
5. **Occupation:** these data are used to infer the area in which the member is working, for example in a museum, commercial unit or university. This aids us in assessing the composition of the membership.
6. **Affiliation (place of work or study):** used to monitor membership composition, maintain contact with different organisations, and is also useful when validating student memberships.
7. **Proof of student status:** requested to verify that the individual is a student. The expiry date is logged so that we can follow up any individuals who continue to pay the concessionary rate after that date.
8. **Payment records:** record the date of payment, membership year the payment is for, amount paid, and how monies were paid. This information is necessary to ensure that only individuals who are fully paid-up members have access to membership benefits. The date of payment and method of payment is essential to check/track payments in PayPal and in the BABAO's bank account – the Membership Secretary has access to the PayPal account and the NatWest bank accounts in order to do this. The date of payment is also used to verify whether people are eligible to apply for the small grants, and whether they are eligible for the conference discount, or to compete for the student prizes.
9. **A note is made of any special circumstances associated with the payment – e.g. if the payment is made from a bank account with a different name to the member, or a friend or family member pays for the member via PayPal; or whether an invoice or receipt may be required.**

### Note on cheque payments:

For each member paying by cheque, a record is kept of the cheque number for each payment made. A list of cheque payments (including membership no., name, amount paid and cheque no.) is sent to the Treasurer with each batch of cheques so that the Treasurer can check that all cheques have been received. In the event a cheque bounces, the bank will provide the cheque no. and we will need to link that to the member in order to inform them of the situation and request payment.

This information is kept for the current membership year, and then deleted at the end of that year.

### Current uses of data beyond managing individual membership records:

Data about the membership are compiled by the Membership Secretary into reports for the Board of Trustees meetings (3 per year), the AGM report, and the Annual Review report. This entails reporting the overall number of members, the number of members in different categories (e.g. student/ waged/ retired/ unwaged; occupation; broad regions where our members reside). The data presented are compiled in an anonymous format.

Checking that individuals are paid up members before the deadline (31<sup>st</sup> January) when applying for small grants; checking individuals are members when paying the membership rate for the conference, or when applying for the BABAQ conference bursaries; checking individuals are student members who have paid before the deadline (conference abstract submission deadline) when establishing who is eligible to compete for the student prizes.

### Management of Data

At present the membership database is kept on a personal computer, which is password protected. Requests to have personal information updated can be made via the 'Updating Your Details' form on the website: <http://www.babao.org.uk/membership/#updatingdetails>

Completed forms should be sent to: [membership@babao.org.uk](mailto:membership@babao.org.uk). We will correct any out of date information within one month and will confirm that the information has been updated.

### Retention of Data

The data of members who have left, or whose membership has expired, is held for a period of 12 months. All details are deleted on the 'live' database, but their details will be retained on the monthly backups to assist with accidental data loss and data corruption issues. Additionally, the Treasurer requires information on left/expired membership to report to the Charity Commission. The backup is deleted and replaced monthly.

## ***Treasurer***

The Treasurer uses members' data to ensure payment of money owed to the organisation, to make refunds of money incorrectly paid to the organisation, and to pay financial awards relating to grants, bursaries and other awards the BABAO make in line with their charitable objectives. The Treasurer does not have direct access to any database of information about members but will request certain information only when necessary to conduct the BABAO's business. This information will not be retained or stored by the treasurer.

The Treasurer has access to BABAO's PayPal account.

The Treasurer has password-protected access to personal information about the Trustees comprising name, address, date of birth, national insurance number and telephone number which is recorded and held by the Charities Commission. The Treasurer is responsible for updating this when necessary and so will request this information from Trustees when necessary. This information will be used only to conduct BABAO business and will not be retained or stored by the treasurer outside the Charity Commission web portal.

More specifically, the Treasurer:

1. Accesses personal data about members held/managed by the Membership Secretary comprising full names, postal addresses, membership status and email addresses when necessary to ensure:
  - a) membership fees are paid correctly and in a timely manner, refunds of incorrectly paid membership fees are issued, unpaid fees are requested, cheques are issued to the correct person and that they are sent to the correct address, or members requiring refunds identified via PayPal
  - b) all money related to research grants awarded by the organisation is correctly paid to recipients of these grants in a timely manner
  - c) all money awarded to members as a result of conference prizes, conference bursaries, and any other award officially made by the organisation to a member, is correctly paid to recipients in a timely manner
  - d) all reasonable expenses are reimbursed to members conducting voluntary work on behalf of the organisation, for example to those participating in outreach events, or to Trustees

Members' details are requested by the Treasurer from the Members Secretary for the above purposes will not be copied, stored or retained by the Treasurer. All email correspondence containing personal information will be password protected and deleted once the relevant business has been concluded.

2. Requests and handles bank details of members to enable financial transactions involving the tasks a) to d) in point 1 above. Bank details will only be requested by the Treasurer in cases where payment/refund via PayPal (standard for most membership fee transactions) or cheque is not possible, or where the member requests and agrees that transactions be undertaken using bank transfer as opposed to PayPal or cheque.

Members' bank details for the above purposes will not be copied, stored or retained by the Treasurer. All email correspondence containing bank details will be deleted once the relevant business has been concluded.

Members' bank details handled by the Treasurer will not be shared with any external organisation, or other members or Trustees of the BABA O.

Where transactions have been made via bank transfer, members' bank details will be stored with Nat West as part of their payment transaction history for BABA O's bank accounts.

3. May hold documentation with personal information about members or Trustees where it is included on hard copy receipts and other supporting documentation provided to evidence financial transactions to be reimbursed. This information is not required by the BABA O, but if given to us will be stored in a secure document folder at the Treasurer's home address for at least seven years to comply with financial audit requirements.
4. Requests and uses personal data about the Trustees to ensure BABA O fulfils its legal commitment as a charity to keep up-to-date records with the Charities Commission.

### ***Representative from the Commercial Sector***

The Representative from the Commercial Sector may ask the Membership Secretary for the details (names and contact emails) of members working in the commercial sector only. This is to communicate directly with these members so that their concerns and suggestions can be brought to Trustee meetings. The data will be transferred using password protected files. Once the data have been used for this purpose it will be securely deleted by the Representative from the Commercial Sector.

### ***Student Representative***

The Student Representative may ask the Membership Secretary for the details (names and contact emails) of student members. This is to communicate directly with these members, so that their concerns and suggestions can be brought to Trustee meetings. The data will be transferred using password protected files. Once the data have been used for this purpose it will be securely deleted by the Student Representative.

### ***Outreach Officer***

The Outreach Officer retains the details (names and contact emails and phone numbers) of the members who have volunteered to help at outreach events. This is to communicate directly with these members about upcoming opportunities. Each of these members have given consent for this information to be kept. The data are stored in a password protected file and will be transferred from the Membership Secretary using password protected files. These data will be annually updated, amended and deleted if necessary. Volunteers have the option to ask us to remove their details from this file at any time; all personal information will be deleted within one month of a request.

The Outreach Officer may take and store photographs from BABAO events. They will store these securely and only publish photos of members who have completed a consent form.

### ***Communications Officer***

The Communications Officer may ask the Membership Secretary for the details (names and contact emails) of members. This is to manage members' access to the members' area of the BABAO webpages, and to assist in managing the BABAO mailing list. The requested data will be transferred using password protected files. Once the data have been used for this purpose it will be securely deleted by the Communications Officer.

### ***Representative from a Museum***

The Representative from a Museum may ask the Membership Secretary for the details (names and contact emails) of members working in museums only. This is to communicate directly with these members so that their concerns and suggestions can be brought to Trustee meetings. The data will be transferred using password protected files. Once the data have been used for this purpose it will be securely deleted by the Representative from a Museum.

### ***Representative from a Professional Organisation***

The Representative from a Professional Organisation may ask the Membership Secretary for the details (names and contact emails) of members working for a Professional Organisation only. This is to communicate directly with these members so that their concerns and suggestions can be brought to Trustee meetings. The data will be transferred using password protected files. Once the data have been used for this purpose it will be securely deleted by the Representative from a Professional Organisation.

### ***Secretary***

The Secretary may receive communications from the membership which will be stored securely and will only be passed on to the Board if necessary. The information will be anonymised as much as possible. The Secretary is responsible for storing permission forms from members who are happy to appear in photographs and videos published by BABAO. Along with the Data Protection Lead the Secretary will be responsible for renewing these at the end of two years.

The Secretary is the first point of contact for the Complaints Procedure, as set out in Standard Operating Procedure 3 and will store any information securely, redacting parts when they are passed on to the Complaints Council. If any third parties are involved in the process they will be reminded of BABAO's Data Protection Policy and will not be allowed to store any information beyond the end of the process.

### ***Grants Secretary***

The Grants Secretary receives grants applications from the membership. This includes the full name, address, email, phone number, membership number, employment details, academic affiliation, supervisor's/manager's details and DDOBA eligibility criteria. The Grants Secretary does not receive payment information from applicants. Any data forwarded to the trustees for review will be anonymised. Grant applications are stored in an anonymised format.

### ***Annual Review Editor***

The Annual Review Editor receives information directly from members to be published in the Annual Review. Any additional information to be published relating to the past year's activities from the Board of Trustees are received from the Board Members. Any personal information held by the Annual Review Editor regarding the contributors will be securely disposed of once the Review is published.

### ***President***

Beyond viewing anonymised data for reviews, it is unlikely that the President will require access to personal data from the Membership.

### ***Non-executive Member and Data Protection Lead***

Beyond viewing anonymised data for reviews, it is unlikely that the Non-executive Member will require access to personal data from the Membership.

## **Third Parties**

### BABAO Mailing List

The BABAO mailing list is hosted by JISCMail, and all members are subject to JISCMail's regulations and data protection regulations.

On joining BABAO, a member's email address and name is added to the BABAO mailing list and two automatic email notifications from JISCMail are sent to the member. The member can choose to unsubscribe from the mailing list, or adjust their settings governing how they receive emails, by logging onto the JISCMail website. Alternatively, they can contact the Membership Secretary to ask for assistance with this.

All members can post to the mailing list, and there are guidelines relating the 'emailing behaviour'. The Communications Officer and Membership Secretary reserve the right to exercise the option to moderate the posts of individual members, should the content posted be deemed inappropriate and if the member in question has ignored requests to change their behaviour. Most messages sent to the mailing list are sent from members and therefore do not come from the BABAO as an organisation. However, the Trustees do occasionally send messages about official BABAO business to the members via the mailing list.

### The BABAO website

There is a small database underpinning the membership area of the BABAO webpage. This contains:

1. Name
2. Email address
3. Password
4. Last visited date – the date the member last logged into the members' area
5. Record of failed attempts to log into the members' area

The Membership Secretary creates a record for new members in the BABAO website database, entering their name and email address according to the information supplied with their application, and providing them with the appropriate permissions. A random password generator is used to generate a random 16-digit secure password which is then copied and pasted into the 'Password' field. No record of this password is made. The member is advised to change this password as soon as possible, and they are provided with instructions on how to do this.