

MLAGB and General Data Protection Regulations (GDPR) for Branch Secretaries

Dear Colleagues,

We are an association run by unpaid volunteers and the last thing you need is extra hassle. There is nothing very complicated here but there are some steps that you do need to take.

Many of you will have been involved in making sure your businesses are GDPR compliant over the last few months but may not have realised that GDPR will also apply to the MLAGB and our activities within it. . Some of you have already taken steps with regard to GDPR and your Branches. Others may not even have heard of GDPR.

GDPR comes into force on 25 May 2019 and will continue in the same form after Brexit. They are an updating of the existing laws (the Data Protection Act) regarding the holding of data. They are really aimed at the big organisations who deal in data as a commodity but associations like MLAGB are part of the by-catch and we are definitely in the same net.

Most of us are already very careful with the data we hold. In the past, if a data security breach occurred, the security procedures would then be reviewed and an opinion formed as to their adequacy. We are now obliged to be proactive and state what safeguards we have in place and to assess our systems for any weaknesses. We are also obliged to immediately report any breaches of Data security. These things also need to be regularly reviewed.

The first step was to create a MLAGB Code of Practice for Data Protection. This is attached and you really need to read it. There is also attached the MLAGB Privacy Statement. The most up-to-date versions will always be the one on the MLAGB website.

In practice Branch Secretaries need to hold necessary data on members securely and delete or destroy physical data (not recycle) which is not needed.

If you are sure that your mailing lists is up to date there is no problem. It is perfectly reasonable to conclude that members want to continue to be members and that updated consent is not required to keep sending them information. This is allowed under the Act under the heading of Legitimate Interest. If you know of people who have left your branch then take the time to check your lists and remove those names.

Records relating to range attendance and held in compliance with Firearms and Explosive legislation need to be held for 6 years. After that time they need to be destroyed.

There will be wording added to MLAGB entry forms which may be some version of:

"If competitors do not want their name or picture to appear on match reports tick here "

For a lot of Branch competitions there are no forms, and where they are used they may relate only to squadding. If you are going to have a form then it should include the opt out. It is no longer acceptable to say that an individual must accept use of data as a condition of receiving a service if that data is not essential to the provision of a service, so you need to use the correct words.

There may be other stuff we need to do, and that will become clear over the the next few months, but these are the basics.

What should you do now?

1. Read the documents
2. Make sure that the electronic records you hold are secure (password protected or encrypted)
3. Make sure paper records are securely stored (locked metal container eg your gun cabinet)
4. Make sure that you are not holding out of date or unnecessarily data
5. Update contact lists.
6. If you have Competition forms add a data opt out

Paul Wolpe Data Protection Lead 30 April !8