

FAST Data Protection Policy

About FAST

FAST (the Farnborough Air Sciences Trust) is a Registered Charity (no 1040199) and was founded in 1993 to safeguard Farnborough's priceless aeronautical heritage. The FAST museum is dedicated to Farnborough's proud aviation heritage and significant contribution to air science and research. It offers an important educational resource as well as an entertaining and stimulating day out for anyone interested in aviation history and scientific progress.

Aim of the Policy

FAST needs to obtain and keep certain personal information on its Trustees, Volunteers, members/donors, visitors and purchasers of items from the shop to carry out its day to day operations, to meet its objectives and to comply with legal obligations. This includes any offline or online data that makes a person identifiable, such as names, addresses, telephone numbers, email addresses, credit/debit card details, dates of birth, photographs, medical conditions (the final one is particularly sensitive). FAST is committed to ensuring all such personal data will be dealt with in line with the General Data Protection Regulation (GDPR) (see below).

The aim of this Policy is to ensure that appropriate procedures are in place within FAST to handle and protect all personal data in accordance with the requirements of GDPR and that everyone handling personal data is fully aware of the requirements and acts in accordance with these.

Data Protection Principles

FAST is committed to processing data in accordance with its responsibilities under the GDPR which come into force on 25 May 2018. Article 5 of the GDPR requires that personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes

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- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay
- e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Responsibilities

Overall responsibility for protection of personal data rests with the FAST Trustees. The nominated Trustee for Data Protection is David Wilson. Responsibility for protection of the FAST Association (FASTA) Membership data rests with the FASTA Committee (point of contact Mike Sargent).

All Trustees and Volunteers will be made aware of this Policy and will be asked to sign that they have both understood it as it applies to them and will act in accordance with it. In addition, any Trustee or Volunteer who is required to process personal information will be asked to sign a document setting out what data they will be handling and how the data will be stored, processed and protected, accepting responsibility for protecting that specific subset of data.

Breaches of this Policy will be reported to the Trustees who will take the appropriate action.

Type of Information Held and Processed

FAST ensures that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed and securely destroyed when no longer required for such purposes.

FAST collects, stores and processes the following information for the following purposes:

Group of People	Purpose of Data Collection (Lawful Purpose)	What Data are Collected	How Data are Collected	How Data are Stored / Processed	Who Processes / has Access to Data	When are Data Destroyed
FAST Trustees	Communicating with Trustees	Name Home address Telephone number(s) Email address	Verbal Email	Hard copy in locked container; Email addresses on computer	FAST Trustees Authorised FAST Volunteers	Within 1 month of person ceasing to be a Trustee
Potential FAST Volunteers	Responding to enquiries about becoming a Volunteer	Name Home address Telephone number(s) Email address (optional)	Paper form Email	Hard copy in locked container	FAST Secretary FAST Museum Manager Authorised FAST Volunteers	Within 1 month of person deciding not to become or ceasing to be a Volunteer
FAST Volunteers	Management of and communicating with Volunteers; Ensuring security of Museum site; Dealing with an Emergency concerning the Volunteer	Name Home address Telephone number(s) Email address (optional) Date of Birth (optional) Car registration number(s) (optional) Important medical details (optional) Emergency contact details ¹ Photograph ²	Paper form; FAST photographer; Accident book	Hard copy in locked container; Photo on FAST authorised computers	FAST Secretary FAST Museum Manager Authorised FAST Volunteers Emergency Services	Within 1 month of person ceasing to be a Volunteer
FAST Association (FASTA) Members	Management of subscriptions; Communicating with FASTA Members; Sending Newsletter; Informing Members of Events and Promotions	Name Home address Telephone number(s) (optional) Email address (optional)	Paper form Online form	Hard copy in locked container; Spreadsheet on FASTA authorised computers	FASTA Committee members FASTA authorised volunteers	Within 1 month of person ceasing to be a FASTA Member
Donors of Artefacts to Museum	Keeping a record of donations; Sending Thank You letter; Corresponding with donor about artefact (if necessary)	Name Home address Telephone number(s) (optional) Email address (optional)	Paper form	Hard copy in locked container	FAST Trustees Authorised FAST Volunteers	Not destroyed

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Donors of Money	Keeping a record of donations; Claiming Gift Aid; Sending Thank You letter; Communicating about FAST (including future fundraising) if opted-in	Name Home address (optional) Telephone number(s) (optional) Email address (optional) Credit/debit card details (if paying by card)	Paper form Online form Credit/debit card slips	Hard copy in locked container; Gift Aid spreadsheet	FAST Treasurer plus Volunteer responsible for Gift Aid claim (if donation Gift Aided)	Contact details 12 months after donation unless opted in to future communications; Credit card details 3 months after payment received by FAST
Gift Aid Declarations	Reclamation of Gift Aid from HMRC on donations and FASTA membership subscriptions	Name Home address	Paper form	Hard copy in locked container; Gift Aid spreadsheet	FAST Treasurer and Volunteer responsible for Gift Aid claim	6 years after the end of the tax year in which the last donation was made (HMRC requirement)
Organisers of Visit to FAST Museum or Wind Tunnels	Communicating about visit	Name Address Telephone number(s) Email address	Paper form Telephone	Hard copy in locked container	FAST visit staff FAST office staff	12 months after visit unless opted in to future communications
Purchasers from FAST Museum Shop	Payment for purchases by credit/debit card	Credit/debit card details	Credit/debit card slips	Card receipt in locked container	FAST shop staff FAST Treasurer	3 months after payment received by FAST
Purchasers from FAST Online Shop	Management of online purchases, including payment, delivery of items and communication about orders	Name Address	Paypal details Ebay details	Hard copy in locked container	FAST shop staff FAST Treasurer	3 months after payment received and goods despatched by FAST
People enquiring about FAST	Responding to enquiry	Name Address (if given) Telephone number(s) (if given) Email (if given)	Letter Email Verbal Written record of telephone call	Hard copy in locked container; Email on FAST computer	FAST Office staff	3 months after enquiry satisfactorily dealt with
Expenses Claimants	Payment of legitimate expenses via BACS	Name Bank details	Paper form	Hard copy in locked container	FAST Treasurer	3 months after claimant ceases to have a role within FAST where expenses could be claimed

People included in FAST Archives	Running a Museum and Archive ³	Various – including name, photo, subject in film	Archived material (eg hard copy, photo, film)	Hard copy Film/video/ DVD Spreadsheet	FAST Trustees FAST Volunteers	Not destroyed
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Notes:

1. Collecting and processing important medical information and emergency contact details for Volunteers is lawful as it for the purpose of protecting the vital interests of the individual or another person – eg seeking help from Emergency Services or First Aider in the event of an accident or other emergency.
2. Taking, processing and storing a photograph of a Volunteer is lawful as it is needed to produce an identity badge which is needed for security purposes (legitimate interests of charity).
3. Collecting, storing and making available to interested parties archive material about the work of RAE and associated organisations (eg RAF IAM) is the remit of FAST and this necessarily includes records of the people involved and the work they carried out (legitimate interests of charity).

All current personal data held by FAST will be reviewed by the relevant FAST person (iaw the Table above) and unnecessary or out of date data will be destroyed in accordance with the Data Destruction Policy (see below) as soon as practicable.

FAST Privacy Notice

The FAST Privacy Notice has been updated iaw GDPR and will be made available via a link on the FAST website and will be referred to on all FAST communication requesting personal data. FASTA has its own Privacy Notice which will be referred to on all FASTA communications requesting personal data.

FAST Forms

All FAST Forms that contain a request for personal data will be reviewed by the form owner and amended (if necessary) to include a statement specifying the purpose for which the data are being collected and, if further communication is sought, an explicit opt-in for such communication via post, telephone and/or email. A reference to the FAST Privacy Notice will also be included (or the FASTA Privacy Notice for FASTA forms).

Data Protection Impact Assessment (DPIA)

The need for a formal DPIA has been considered and, after using the DPIA screening checklist on the ICO website, this was only considered necessary for the sensitive data held (medical data for Volunteers). How these data are collected, processed and stored, and the reasons why these data are necessary, are as described in the table above. The level of risk is not considered high. All Volunteers who have provided medical data will be contacted, informed as to how and why these data are held, and given the opportunity to have these data deleted.

Data Security

FAST takes the security of personal information very seriously and will put appropriate measures in place to minimise the risk to the information from unauthorised or unlawful loss, disclosure, theft or misuse.

Physical Security

The FAST Museum site is protected by a security fence and a lockable gate. The Museum is open to the public at weekends and Bank Holiday Mondays. FAST Volunteers' working days are Tuesdays and Thursdays. So the site is manned by FAST personnel on Tuesday, Thursday, Saturday and Sunday (plus Bank Holiday Mondays). There are currently tenants in two of the offices in the main FAST building (Trenchard House) on Monday to Friday. They obviously have their own access to the site, but do not have access to any of the FAST Offices as these are locked when FAST personnel are not on site (Monday, Wednesday and Friday).

Paper forms may be received by post or handed to a FAST Volunteer in person. Post to FAST will be delivered to a locked postbox by the gate, with access only by authorised FAST personnel. Post for FASTA will be placed in a locked container until they can claim it. All post not addressed to a specific person is opened by the FAST office staff and passed on to the appropriate individual for action as necessary. All post found to contain personal data will be passed as soon as possible to the person responsible for dealing with it or placed in a sealed envelope and kept secure if that person is not available. Any FASTA membership form or donation / Gift Aid form given to a Volunteer will be placed in the locked FASTA container or a secure donation box respectively. Any other document containing personal data handed to a FAST Volunteer will be given to the appropriate authorised person as soon as possible. If that authorised person is not available the document will not be left in open view but will be placed in a sealed envelope and kept secure until that person can claim it.

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Some enquiries made by telephone may include personal data. These are handled by FAST office staff. Any personal data written down will be treated in the same way as paper forms as described above.

All data processing at the FAST Museum is carried out in offices that are only used by FAST personnel. Visitors to the Museum (both organised parties during the week and the general public at weekends) do not have access to FAST offices. All FAST Volunteers wear identity badges so anyone found in or around FAST offices not wearing a badge will be challenged and escorted away from the offices.

All data stored in paper form (including credit card slips) will be kept in locked containers with only authorised FAST personnel having access to the keys. All offices that contain these containers will be locked when the Museum site is not occupied by FAST personnel (usually Monday, Wednesday and Friday). As it is impractical to lock the offices when FAST personnel are on site, any personal data being processed by an authorised person will be made secure when left unattended by that person.

Digital Security

Emails are received by the FAST Secretary, Manager, Treasurer or Shop (and by FASTA). All FAST email accounts are protected by complex passwords and are only accessed by authorised FAST personnel. Any email containing personal data that is printed out will be protected as described above (Physical Security).

All data stored on FAST computers (including emails) will be protected by the use of complex passwords and/or encryption. All data stored on transferrable media (eg USB memory sticks) will be encrypted and/or protected by complex passwords. Where possible, all transferrable media will be kept in a locked cabinet (or equivalent) when not in use. Only the minimum of data will be transferred via external email (and only if necessary) and will be protected by complex passwords. All computers containing personal data will be shutdown or locked (and password protected) when left unattended.

The FAST computers are not networked and WiFi is not used. Some FAST computers are connected to the Internet and these are protected by good commercial anti-virus and firewall software. Regular backups will be made at least monthly on encrypted and/or password protected external media and stored securely.

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Credit/debit card details for payments for shop purchases (in person and online) are securely protected and FAST is fully compliant with the Payment Card Industry Security Card Standard (renewed annually).

The FAST website does not use cookies. FAST has an online shop and an Ebay shop; payment for both is via Paypal so the only personal data received by FAST is the purchaser's name and delivery address. These will be protected as described above. FAST has a social media presence on Facebook and Twitter, but does not collect personal data via these platforms.

Due to the high risk involved, personal data will not normally be processed on personal computers at home. In the event that use of personal computers for personal data processing is deemed necessary, a full risk assessment will be carried out (and documented) and written authorisation from at least two Trustees will be sought. Lists of email addresses can be kept on personal computers if the purpose for holding these is for necessary communication with other FAST personnel on FAST business. However, these personal computers will have up-to-date anti-virus software installed and running.

Data Destruction

Data destruction will only be carried out by FAST personnel who have authorised access to that data. All destruction of personal data will be recorded in the data destruction register held by the FAST Secretary for non-FASTA data and by the FASTA Membership Secretary for FASTA data.

All personal data held in paper format will be securely destroyed by means of a cross-cut shredder when no longer needed to be retained.

All personal data held on a computer or other digital media will be deleted in such a way that the data file is permanently deleted from the computer or digital media. The FAST IT personnel will advise on the most appropriate way of doing this.

Procedure in Case of a Breach

If a breach of data protection occurs, the nominated FAST Trustee will promptly assess the risk to the relevant people's data and, if considered appropriate, report this to the Information Commissioner. If reported, this must be done within 72 hours and the people whose personal data has been disclosed must be informed within 1 month. All breaches must be recorded and the relevant data protection practices will be reviewed (and amended if necessary).

Sharing of Information with Third Parties

FAST does not sell information to any third parties, nor is it shared with any third parties apart from in the following circumstances:

- Legal requirement, eg court order, law enforcement agency pursuing an investigation
- Emergency situation where personal details (including medical information, emergency contact) need to be given to the Emergency Services or a First Aider
- Protecting or defending FAST's rights, property or the personal safety of FAST volunteers or visitors to the FAST premises or website
- HMRC Gift Aid claim - information (name and home address) has to be sent to HMRC as part of the claim process for Gift Aid so that Gift Aid can be reclaimed on donations

Social Media Sites (Facebook, Twitter)

FAST has an official Facebook and Twitter presence. FAST does not expect to collect personal data from use of these social media sites. In the unlikely event that this does occur, FAST will protect these data in the same way as any other personal data. However, FAST cannot control how the providers of the social media websites will use any personal data, so the FAST Privacy Policy makes clear it is the individual's responsibility to view the appropriate social media Privacy Policy before sharing data and to make use of their privacy settings to control how their data is used.

Keeping Data Accurate and Up to Date

As it is essential that all personal data are accurate and up to date, any data found to be inaccurate (eg email addresses bouncing) will be rectified if possible or, if not, securely destroyed (in accordance with the data destruction policy). In addition, all personal data held by FAST will be reviewed on a regular basis (at least quarterly) by the relevant FAST person (see above Table) and any data no longer required will be securely destroyed.

FAST will make it easy for people to update their personal data as necessary. Any communications from FAST will include the contact details of who to notify of changes of personal data (eg name, address, telephone number, email).

Communication with Volunteers and Supporters

FAST will only communicate with Volunteers and Supporters (by post, telephone, text or email) if there is explicit consent to do so and will ensure that the record of consent is stored with the appropriate personal data. The exception to this are the historic records on previous donations of artefacts to the FAST Museum and Archives where FAST needs to communicate with the donor (using the details provided on the donation form) if there is any query relating to the artefact. Explicit opt-in consent will be obtained from all Volunteers and current FASTA members and, where consent is not given, these details will be removed from the relevant FAST data and destroyed.

Instructions on how to unsubscribe will be contained within every email message sent. In addition, it will be made clear (via the FAST Privacy Notice) how someone can change their communication preferences at any time and their records will be updated within 14 days.

Individual's Rights (including Subject Access Request)

An individual has the right to see a copy of the information that FAST holds on them, via a Subject Access Request. This includes an entitlement to be (a) told whether any personal data are being processed, (b) given a description of the data, the reasons they are processed and whether they will be shared, (c) given the source of the data and (d) ask to have any inaccuracies corrected. They also have the right to (a) request deletion of any of their personal information and (b) request that FAST stops processing their information at any time without giving a reason (although this may restrict what information they then receive (eg FASTA newsletter) or mean that they can no longer be a Volunteer).

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Anyone wanting to exercise any of these rights should be asked to apply in writing to the FAST Secretary for non-FASTA data and to the FASTA Membership Secretary for FASTA data. Proof of their identity will be required before releasing any personal information to them (typically that required by financial institutions eg Driving Licence, Passport). Any requests should be actioned within 1 month.

Registration with the Information Commissioner (ICO)

As a “non-profit organisation” FAST is currently exempt from registration with the Information Commissioner (iaw the self-assessment tool on the ICO website). However, once FAST has a working CCTV system in operation at the Museum, FAST will need to register with the Information Commissioner (at an annual fee of £35). This registration will be renewed on an annual basis. If there are any interim changes, these will be notified to the Information Commissioner within 28 days.

Complaint Handling

Any complaints about the way FAST has handled any personal data will be referred to the nominated FAST Trustee in the first instance.

Policy Review and Endorsement

This Policy has been reviewed and endorsed by the FAST Trustees on 30 April 2018. It will be reviewed by the Trustees on an annual basis to ensure it remains up to date and compliant with the law.

List of Amendments

Date	Details
30 April 2018	Policy endorsed by FAST Trustees
8 May 2018	Addition of statement regarding annual Payment Card Industry Data Security Standard Compliance for card payments Minor editorial changes

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