

# ● Guidance for Research Groups

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## 1. Introduction

On 25 May 2018, data protection rules changed from the 1998 Data Protection Act to the General Data Protection Regulation (GDPR). These regulations apply to all EU member states and will be enforced and monitored by the Information Commissioner's Office (ICO) in the UK. (Brexit will have no impact on the implementation of GDPR in the UK.)

This guidance document has been put together to ensure that all of the RGS-IBG Research Groups manage personal data in compliance with the new regulation. It outlines how to manage the personal data collected by Research Groups and the third parties that can be used to help to process that data. It also provides guidance on informing Research Group members about how their data is being processed.

Each Research Group must:

- Appoint a Data Controller and let us know who this is. By default, we will assume this is the Chair of the Research Group, but you may nominate another committee member to take this role. The Data Controller must read the privacy notices of all third party platforms being used by the Research Group (e.g. Eventbrite, Dropbox, Google Docs etc.).
- Only collect, store and use personal data that is required for the servicing of Group membership. This is likely to be limited to name, contact details, and RGS-IBG membership number. Dietary requirements can be collected as part of an event booking.
- Never collect credit and debit card, or bank details.

Chairs of Research Groups will be asked to complete and sign a form after reading this document. These forms will be kept by us. When a new Chair is elected they will have to read and agree to these guidelines, as will any new Data Controller once elected, where this is not the Chair.

This document is not exhaustive; if something is unclear or a scenario you are facing is not covered, please get in touch with us ([rhed@rgs.org](mailto:rhed@rgs.org)).

## 2. Glossary

*Personal data* – “Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.” (ICO – Key Definitions for GDPR). For Research Groups this includes names, contact details, expertise, and dietary requirement. It applies to both paper copies and electronic files.

*Data controller* – “Determines the purposes and means of processing personal data.” (ICO – Key Definitions for GDPR). In the case of the Research Groups, this is the Chair or other nominated committee member.

*Destroy securely* – For paper files this means shredding or disposal in secure waste. For electronic data located on a computer hard drive this means deleting the file and then emptying the recycling bin.

*Store securely* – Refers to protecting data from unauthorised access. For paper files this can mean storage in a locked cabinet. For electronic files this means having systems in place such as password protection.

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*Password Protected* – only allows access to data to those who enter the correct password. Passwords should be “strong” with use of letters, numbers and other characters. Easily guessed password like “password1” for example should not be used.

### **3. Managing and storing personal data**

All Research Groups will store the data they collect slightly differently, however the Society requires all Research Groups to have a standard approach to managing and administering the information they collect by adhering to the principles below.

#### *3.1 Storing and sharing data*

- [Dropbox](#) and [Google Docs](#) are the preferred third parties to use for both storing and sharing information such as lists of members, competition entries and annual report (this is not an exhaustive list). Both of these third parties use password protection for accessing the data and are GDPR compliant.
- Personal data should not be stored on portable USB drives or similar devices.
- Research Groups should seek to minimise the number of committee members with whom data are shared (ordinarily to be limited to Research Group officers and an appropriate designated committee member as needed e.g. dissertation prize coordinator for dissertation prizes).
- The number of locations where data is stored should also be kept to a minimum (i.e. a main location and a backup). In all cases data should be stored securely (password protected), and destroyed securely once it has been processed or is no longer needed.
- Research Groups should regularly review all old files and data, and securely destroy any that are no longer in use. Any data relating to former members of the group should be securely destroyed no longer than one year from their departure from the group.

#### **Exceptions:**

If the Research Group wishes to use another document sharing platform, then please contact us for approval.

#### *3.2 Managing membership*

- The monthly membership data sent to the Research Group Officers from RGS-IBG will no longer be sent as an email. Instead, a Dropbox folder will be set up for each Research Group and the lists of current members, new joiners and leavers will be stored and updated here.
- For good housekeeping purposes, only the most current monthly list will be stored here. Previous lists will be deleted.
- Only the Research Group Officers (and the Membership Secretary, where this role exists) will have access to this information – it is not to be shared with other members of the committee or research group members.

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- Research Groups should send a welcome email to new members and encourage them to sign up to the group's Jiscmail list (including a privacy notice on how their data will be used by Jisc – see section 3.4).
  - Research Group members whose RGS-IBG membership is about to lapse will be sent an email from the RGS-IBG membership department to remind them to renew and the consequences of not renewing, including losing membership of any Research Groups they have signed up to. Once membership has lapsed, we cannot use an individual's details to contact them unless they have given explicit consent to receive information from us about specific topics.

### **Associate members**

- The designated Data Controller for each Research Group will be responsible for managing the data of associate members of the Research Group (that is, members of the Research Group who are not current members or Fellows of the RGS-IBG).
- The Society recommends that the guidance set out in this document is used to inform the Research Group's policy on storing and managing associate members' data. We require all Research Groups to supply us with a short statement outlining how they manage the data of associate members of the Research Group.

### *3.3 Organising events*

- [Eventbrite](#) should be used for organising and booking events. Eventbrite's platform is GDPR compliant and the updated privacy notice should be read prior to continuing use.
- For organisation of events, we recognise that lists of event attendees and possible associated data may be downloaded e.g. to prepare name badges for delegates. If downloaded, this data needs to be kept in a secure (password protected or locked) location and securely destroyed once the event has taken place (this includes both electronic and paper copies).
- When collecting information that will be shared with a third party in order to organise an event, e.g. sharing dietary requirements with a catering company, a privacy statement will have to be placed on the relevant registration form or document to inform the event attendee of this. See section 5 for recommended template.

### **Exceptions:**

If the Research Group wishes to use another event organising platform, then please contact RGS-IBG for approval.

### *3.4 Email communications*

- When communicating with Research Group members, committee members should use their personal and work emails sparingly and with care, and generally only when needing to communicate with particular individuals.

- [Jiscmail](#) should be used as the main system through which emails are sent to Research Group members. Research Groups must not send an email to all Research Group members using bcc.
- Research Groups should ensure that at least one of the list owners is a current named committee member. See the Research Groups Handbook for more information, available from [www.rgs.org/research/research-groups/](http://www.rgs.org/research/research-groups/).
- Where the Research Group wishes to circulate an electronic newsletter in a format that cannot be circulated via Jiscmail (e.g. a PDF newsletter), ideally the content should be hosted on the Research Group's website and linked to from a Jiscmail email.
- Jiscmail have advised that list owners do not need to re-permission existing subscribers to existing Jiscmail lists, although this is at the discretion of the list owners. As an act of good practice, Research Group list owners should post an email that outlines the recent changes and their implications, and includes a privacy notice for their list. Please see [Jisc's GDPR FAQs](#) for details and example templates.

### *3.5 Social media*

- Individuals who choose to follow Research Group social media accounts do so of their own choice and have signed up to the privacy policies of the relevant social media platforms.
- Research Groups should not be collecting or storing personal information taken from individuals' personal profiles e.g. on Facebook or Twitter.
- Where live Tweeting (or similar) is taking place during an event, both speakers and attendees should be made aware of this, along with details of how to opt out if desired.

### *3.6 Transactions*

Research Groups that have additional subscriptions for products or membership should ask members to set these up through a standing order with their bank. No financial details should be collected, stored or managed by committee members.

## **4. Privacy Notices and where to place them**

The new regulation requires greater transparency in letting individuals know how their personal data is used. Therefore, it is extremely important that privacy notices are appropriately placed, easy to read and understandable.

### *4.1 Main privacy notice*

- RGS-IBG has drafted a privacy notice specifically for the Research Groups which outlines the key points for GDPR compliance. This will be placed on the Research Group page on the RGS-IBG website. All Research Groups should have an obvious link to this privacy policy on their websites. This is the best approach to ensure any updates made are reflected straight away on all Research Group websites.

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#### 4.2 Membership/event bookings

- On webpages where you link to Eventbrite for an event booking or imply that you will collect data for a specific purpose through an email application (e.g. dissertation prizes) you will need to supply a short privacy notice. (See section 5 for a recommended privacy notice template)
- On forms for membership renewal or new members where personal information is being collected, a short privacy statement is needed. All Research Groups should use the same standard membership form which includes a privacy statement (see section 5 for a recommended privacy notice and section 6 for a sample membership form).

#### 4.3 New committee members

- When a new committee member is appointed by a Research Group, their name, email and professional affiliation will be shared with the RGS-IBG, other committee members, and may be made publicly available via the Research Group's website.
- Committee members need to be aware that they will be contacted by other members of the committee, and by the RGS-IBG.
- A privacy notice to this effect has been added to the Research Group Committee form completed by the Research Group Chair each year.

### 5. Template Privacy Statements

#### *Membership:*

(For RGS-IBG members)

Your personal information will be treated with the strictest confidence. Relevant data, including your name, contact details and affiliation, will be recorded on our membership database and processed under legitimate interest for membership purposes only. Your details will be kept on record as part of the Society's historical archive. More information on our privacy policy can be found on our website.

(For associate members)

Your personal information will be treated with the strictest confidence. Relevant data, including your name, contact details and affiliation, will be recorded and processed under legitimate interest in connection with your membership of the XXX Research Group only. Your details will be kept for one year after you cease to be a member of the Research Group.

#### *Events:*

We use Eventbrite to manage event bookings. The information you provide will be treated in the strictest confidence and only used in connection with your event booking. Your data will be processed by Eventbrite – please read their [privacy policy](#) – and it will be securely destroyed six months after the event. If you have provided dietary information in relation to your booking, this will be shared with the catering company associated with this event.

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*Dissertation prizes:*

The information provided will be treated in the strictest confidence. Relevant data, including name, contact details, topic and affiliation, will be processed under legitimate interest for the purposes of this dissertation prize only. Names and affiliations of prize winners will be made public on our website and will be kept on record as part of the Society's historical archive. More information on our privacy policy can be found on our website.

*Nominations:*

The information provided will be treated in the strictest confidence. Relevant data, including name, contact details and affiliation, will be processed under legitimate interest for the purposes of this nomination only. Names and affiliations of award recipients will be made public on our website and will be kept on record as part of the Society's historical archive. More information on our privacy policy can be found on our website.

*Welcome email encouraging joining Jiscmail:*

We (X Research Group) use Jiscmail as the main method of communication with our members. Therefore, we strongly advise you to join our Jiscmail list [insert link] to keep up to date with relevant information including our events. Whenever you post to Jiscmail through our list, your email address will be visible to other members of the list, but as a recipient of emails your identity and details will not be revealed. To find out more about this, please see the [Jiscmail privacy notice](#) and [Jiscmail service policy](#).

*Research Group committee:*

The information provided will be treated in the strictest confidence. Relevant data, including name, contact details and affiliation, will be processed under legitimate interest for the purposes of maintaining the Society's Research Group records only. Names and affiliations of Research Group committee members may be made public on the Research Group website and will be kept on record as part of the Society's historical archive. More information on our privacy policy can be found on our website.

**The Chair of the Research Group, and the Data Controller where this is a separate individual, needs to complete the form in section 7, detailing all third party services used for processing data and confirming that they have read all relevant third party privacy policies. A signed copy must be returned to RHED ([rhed@rgs.org](mailto:rhed@rgs.org)).**



**6. Sample Research Group associate membership form**

**[name of Research Group]**

We are delighted that you would like to join the [name of Research Group]. For us to process your membership, please provide the following information.

Your personal information will be treated with the strictest confidence. Relevant data, including your name, contact details and affiliation, will be recorded and processed under legitimate interest in connection with your membership of the [name of Research Group] only. Your details will be kept for one year after you cease to be a member of the Research Group.

- Name:
- Affiliation:
- Preferred contact email address:

[If your group charges an additional subscription to associate members, please add details here of subscription rates and how the new member can set this up. We strongly recommend that you ask them to set up a standing order to the group, or provide details for them to make a bank transfer to the group. Do not collect any financial information from members].

**7. Research Group data management agreement**

Name of Research Group:

Name of Chair:

Name of Data Controller (where this is in addition to the Chair):

On behalf of the \_\_\_\_\_ Research Group, I have reviewed our data management practices. I can confirm that we use the following services:

Service	We use this service				I have read the associated privacy notice(s)	
Dropbox (data storage)	Yes		No*		Yes	
	*if no, please provide details of other service used. RHED may contact you for additional information					
Google Docs (data storage)	Yes		No*		Yes	
	*if no, please provide details of other service used. RHED may contact you for additional information					
Eventbrite (events bookings)	Yes		No*		Yes	
	*if no, please provide details of other service used. RHED may contact you for additional information					
Jiscmail (communication with members)	Yes		No*		Yes	
	*if no, please provide details of other service used. RHED may contact you for additional information					



On behalf of the \_\_\_\_\_ Research Group, I confirm that I have read the document above. I have also read all associated privacy notices for the services that we use. I understand that responsibility for the Research Group's data management sits with me, and have undertaken all reasonable measures as outlined in the document above.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Chair of the \_\_\_\_\_ Research Group

Date: \_\_\_\_\_

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Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Data Controller for the \_\_\_\_\_ Research Group

Date: \_\_\_\_\_