GDPR and data protection

Purpose of this document
This document goes into detail about what responsibilities campaign groups have with regards to any personal and sensitive data they collect and hold.

What is personal and sensitive information?
Personal information is defined as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’. What this basically means is any information that is clearly about a particular person and could identify a person out of a group of people for instance. Examples would include information such as name, date of birth, phone number and email address. It can also extend to things like political opinions, student numbers and even their appearance or behaviour.

Sensitive information is personal data relating to an individual’s race, political opinions, health, religious or other beliefs, trade union records, sex life, biometric data and genetic data.

Why it’s important to know this?
You might take part in activities that will mean you collect and store personal and sensitive information of other KCLSU members. This means that your association becomes the “data controller” for this data. This guidance isn’t designed to stop you doing that, rather it’s to make sure you collect it and store it in the right way.

What are my responsibilities when it comes to data?
Collecting data
If you are collecting data, you need to make sure you are open and transparent with the people whose data you are collecting. There are four key things you need to make sure people know when collecting their data:

- Why you are collecting the data – Try and be as specific as possible with people as to why you are collecting their data
- What you are going to do with it – Where you can, give examples of what you are going to do with it – is it to help come up with campaign asks, improve services or design policies. You need to stick to using the data for these purposes, you can’t think of new uses once people have submitted their details to you.
- If you plan to share it with others – We would recommend that you only share data with KCLSU departments and if you do share it you will have to make people aware of who you are sharing it with. This doesn’t apply to if data is anonymous which is discussed below.
- How long you will keep it for – It is important to state how long you will keep the raw data for and stick to this timeframe. Six months to a year is a good timeframe. Put a reminder in your calendar to make sure you don’t forget to delete it.

Storing data
Any data that you collect must be stored securely. Ideally, this would mean:
- Storing data within password protected documents.
- Only one or two students involved in the campaign should have access to the password and data.
- Changing the password every time a new student takes over the responsibility of looking after the data.
- Shredding or destroying any paper documents with personal details on.
- Make it easy for people to ask for their data to be removed from any lists or files you have.
- Keep up to date records on how people want to be contacted as people have a right to ask not to be contacted by certain methods such as email or phone.

What you need to remember when conducting a survey

- Make sure you include the four key pieces of information in the opening statement of the survey, why you are collecting the data, what you are going to do with it, if you plan to share it with others and how long you will keep it for.
- Think about whether or not you need personal information from people taking part in the survey. Making it anonymous will limit the risk of sharing any personal or sensitive data.
- Make sure you get people’s explicit consent from them when you collect their information. For example: I have read and understood the introduction to this survey and I consent to any information I enter to be used by XXX in the format as detailed above.
- Yes / No
- If you want to keep your survey data anonymous then it can be shared more easily. In order to anonymise data, you must remove all data that could be used to identify an individual. This includes, but is not limited to: name, email address, postal address (including postcode), IP address etc.
- Even when sharing anonymous information, it’s worth considering if the data really needs to be shared as you don’t want to run the risk of sharing peoples data by accident.

What you need to remember when collecting names and emails

- Make sure you include the four key pieces of information on the form that you are collecting signatures on; why you are collecting the data, what you are going to do with it, if you plan to share it with others and how long you will keep it for.
- If you are collecting names and emails, try and collect them on a laptop/tablet and make sure the file is password protected and keep the number of people who know the password to a minimum.
- Destroy any paper copies of information, ideally by using a confidential waste bin. Please contact campaign@kclsu.org for more information about accessing a confidential waste bin.
- If you are collecting signatures for a campaign, you can encourage people to sign up at the campaign webpage on the KCLSU website. If you want information to be passed on to people who have joined the campaign, you can send that information to campaign@kclsu.org.
- If people can’t sign on to the campaign page, you can set up a Facebook page and invite them to that and use that as a way to keep encouraging them to sign up to the campaign.
- We would advise you to collect people’s emails for campaigns through your campaigns page which KCLSU staff can administer but if you have collected people’s emails in order to create a mailing list, when you are emailing everyone, make sure you ‘bcc’ everyone into the email so that people can’t see other peoples email addresses.

What you need to remember when taking pictures

- You should always ask permission before taking someone’s photo. If you are taking pictures in a public place e.g. in a public protest march you generally do not need to get everyone’s permission to take pictures but it is always best to ask where you can as people might feel uncomfortable having their image taken and used.
- If you are taking pictures in a private space, such as in a KCLSU or King’s space, make sure you have prior permission. King’s have strict rules around filming on campus. Also, ask people at the event if they are happy to have their pictures taken and make alternative arrangements for those who don’t want their picture taken.
- Make sure you put up a photography notice if you are taking pictures. A template one is below.

Useful resources

If you have any queries or concerns about data, email campaign@kclsu.org
Information Commissioners Office https://ico.org.uk/
Photography notice: We'll be taking photos today

Let the photographers know if you'd rather not be in photos.

We won't ever identify you in our photos and should you request your photos will be deleted.