



**Fire Officers' Association
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The Fire Officers' Association Privacy Notice

May 2018

This Privacy Notice describes how the Fire Officers' Association, in its capacity as the data controller, collects, uses, shares, and keeps information about you in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the General Data Protection Regulation). This document forms part of the Fire Officers' Association Data Handling and Communication Policy (available from the FOA website or on request to Head Office).

Description of processing

The following is a broad description of the way this organisation processes personal information as well as a notice of your rights in relation to such information.

More information is available from the Fire Officers' Association's Data and Communications Policy or you may contact the organisation to ask about your personal circumstances.

Nature of work

The Fire Officers' Association operates as an independent trade union Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.

Reasons/purposes for processing information

We process personal information to enable us to provide a range of services to our members which may include administering membership records including the balloting of members and potential members; providing and organising activities for union members; promoting our services; supporting and managing our employees.

Type/classes of information processed

Information Relating to Membership and Representation

We process information relevant to the above reasons/purposes. This information includes:

- Personal details such as name, address and contact information
- Family details; where provided for payment of benefits
- Financial details necessary to enable collection of subscriptions
- Employment details, e.g. employer and role

In relation to requests for representation and support in connection with employment matters such as discipline or grievance it may be necessary to process sensitive information, such as: -

- Physical or mental health details
- Racial or ethnic origin
- Religious or other beliefs
- Trade union membership
- Sexual life
- Political opinions
- Lifestyle and social circumstances
- Information about offences and alleged offences
- Information about third parties as necessary in relation to the representation of members and their interests.

Under normal circumstances the above categories of sensitive information is not held directly by the Association but by persons or approved and legitimate third parties directly involved in the provision of representation, for example any appointed solicitors.

IP Addresses

Internet Protocol (“IP”) addresses are automatically assigned to the computers by Internet service providers. An IP address may be identified and logged automatically in our server log files whenever you access our websites, along with the time of the visit and the pages that were visited. Your IP address may also indicate your approximate physical location. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other technologies. IP addresses may be used for purposes such as calculating usage levels, diagnosing server problems or for verifying the uniqueness of online survey responses.

Information Sharing

Branch and Regional Officials

Information, limited to name, membership level, e-mail address and employer(s) is securely issued to Branch and Regional representatives of the Association. Such information sharing is necessary for local identification of FOA members for communication and for conducting the business of a trade union.

Solicitors and Insurers

In order to provide effective advice and representation, all necessary information relevant to the matter for which assistance is required may be shared with the Association’s principal solicitor, Slater and Gordon (UK) LLP, and any information imparted will be subject to their Privacy Policy (see <https://www.slatergordon.co.uk/disclaimer/>). Where a case is referred to the Association’s legal insurance provider, Legal Insurance Management (LIM), information shared is subject to their Privacy Policy (see <https://www.legalim.co.uk/privacy-policy>).

The FOA Optional Insurance Scheme

Where applicable, information relevant for membership of the Association’s optional Insurance Scheme and any claims made within the scope of that cover may include elements of the above sensitive information. Such information is processed, on the Association’s behalf by Philip Williams and Company who provide and manage Scheme policies. Only information relevant to the effective operation of the Scheme or for processing claims is provided by the Association.

Where Philip Williams and Company deal directly with members, they will also have responsibilities relating to Data Controllers. Please visit the following link for more information - [Link to Philip Williams Privacy Notice](#)

Financial Information

In order to collect subscriptions or reimburse any due monies, it is necessary to hold details of members' bank accounts. Similar information is also required for officials and staff members to allow payment of wages and repayment of any expenses incurred.

A third party company, Eazy Collect Direct Debit and Card Processing Services, is engaged on behalf of the Association to collect subscriptions via direct debit. This company also provides a platform for gathering initial membership information as part of the online direct debit set-up process. Financial and personal data held and processed by Eazy Collect is subject to both the Association's and Eazy Collect's data policies ([Link to Eazy Collect Privacy Policy](#)).

In order to discharge statutory audit and accounting requirements, the Association's accountant and auditor (currently Samuels LLP) have access to data relating to members and staff. Their data control provisions are set out in the Samuels LLP Privacy Notice. ([Link to Samuels LLP Privacy Notice](#)).

Who the information is processed about

We process information relating to members only to the extent that is necessary to collect subscriptions and maintain access to FOA membership services.

Information relating to officials and staff is also held for the purposes of meeting legal requirements as an employer, for allocating tasks and for communicating information needed to undertake their duties.

Approval and Verification

Members must take positively action to consent to the Association holding their personal data. Without such consent, we are obliged to delete or stop using the information held. This would have the effect of resigning your membership as it would be impossible to collect subscriptions or verify entitlement to services and representation for matters arising from current or past membership.

In order to confirm the accuracy of membership records, a routine member details check is undertaken. From 1st June 2018, these checks will require members to confirm that they consent to their data being held and processed for membership and representation purposes. Members are strongly urged to respond when a details check is received.

Your rights as a FOA Member

Right to be informed

You have a right to be informed about the nature of the data held about you and how your personal information is used.

Right to correct information

You have a right to have personal information corrected if it is inaccurate and to have complete incomplete personal information.

Right to be 'forgotten'

You have a right to have your personal information erased.

Right to object to processing

You have a right to object to the processing of your personal information.

Right to withdraw consent

Anyone for whom the Association holds personal has a right to withdraw consent for its use at any time or to restrict and/or object to the use of that personal information.

Right to correct information

The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed

Right of data portability

You have the right to move, copy or transfer your personal information to another party.

Right to access data

You have the right to request access to your personal information and to obtain information about how we process it.

Automated decision making

Although the Fire Officers' Association does not use automated decision making systems, you have rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

Right to complain

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>.

IMPORTANT NOTE RELATING TO YOUR RIGHTS

It should be noted that exercising a right that requires the erasure or restricted use of information relating to your membership may have the effect of ending membership with the consequences stated in the "Approval and Verification" section above.

Contact from the Association

Your contact details will only be used to communicate for the purposes of issuing information relevant to your membership such as:

- Members' Updates and Circulars
- Consultation on matters relating to employment or FOA membership
- E-mail or letters relating to subscriptions and membership related services available or provided to members.

Marketing

The Fire Officers' Association will not provide any information relating to members to any third party for the purposes of sales or marketing.

Use of 'Cookies' and Other Systems that Collect Data Automatically

Subject to the exceptions listed below, the Fire Officers' Association does not use 'cookies' or mechanisms that automatically collect personal data.

- Capture of employment, contact and financial information via the online membership registration and direct debit set-up process,
- Website Registration where names and e-mail addresses are captured by the website user database for access authorisation purposes and password re-set when requested.

Data Retention

The Fire Officers' Association will only retain personal data for as long as that data is needed to fulfil the purposes for which that data was initially collected.

When personal information is no longer necessary for legal or regulatory needs or to administer membership services, we will take reasonable steps to securely destroy such information or permanently de-identify it.

We maintain strict requirements and security controls needed for identification, storage, protection, retrieval, retention and disposal of personal data.

Information about legal or financial transactions is retained for a period of 6 years in accordance with the general limitation period governing commercial contract law and our external contractors' terms of service.

For more information about our data retention practices, please contact the FOA Head Office.

Use of Data outside the United Kingdom

The Association does not operate outside the United Kingdom and will not, therefore, send or use personal information outside the United Kingdom.

Any information held in relation to members residing outwith the United Kingdom will be subject to the General Data Protection Regulation and FOA Data Policies.

Responsibilities of FOA Representatives, Officials and Staff

All officials and staff members are individually responsible for care in relation to these procedures, and for raising any queries, concerns or training needs which they might have.

On leaving any role within the Association, all records and data held by an official or staff member must be passed on to their successor or, in the absence of an identified successor, destroyed unless such material is unique in which case it should be sent to Head Office for safekeeping or disposal, as considered appropriate by the Chief or Assistant Chief Executive.

Queries and Complaints

If you have questions about this Privacy Notice, how your information is handled or wish to make a complaint or exercise your rights, call our Head Office on 01608 652023 or send an e-mail to foa@fireofficers.org.uk. You may also write to The Fire Officers' Association, London Road, Moreton-in-Marsh, Gloucestershire GL56 0RH.

Policy Review

The Association will routinely review its policies, procedures and documentation relating to the handing of information to take account of changes to processes or legislation; irrespective of which a review will be undertaken at least annually.