

Your 5 step plan to GDPR compliance



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Review your approach to personal information

You should assess how you currently use personal information to carry out fundraising, direct marketing and/or membership services. Make sure you define your:



Purpose – why you collect and use personal information. Distinguish between non-direct marketing (such as administration) and direct marketing activity. Consider which activities are covered by each direct marketing purpose.



Method – what channels you use for direct marketing. This will impact the personal information you will want to collect - email address, phone number, home address. Be clear whether you need to rely on consent to justify the use of this personal information or can use 'legitimate interest'.

Review the privacy notices wherever you collect personal information

Each point of collection for personal information should have a fair processing and privacy notice. You need to assess each one. Do they fully inform people about how their personal information will be used? For example:



Does each notice provide sufficient detail about the different purposes you will use personal information for – including activities that are not typical or likely to be anticipated?



Do your notices make reference to your wider Privacy Policy? If so, are you clear why you have chosen to provide information in the Policy (which people may not see) rather than the notice?



How will you collect 'unambiguous' consent – will it be opt-in, or another method that demonstrates their wishes through a 'statement' or by a 'clear affirmative action'?



Review the quality of consent you currently hold

You should review where you obtained your current data from and the methods used to collect that data. This is because a clear record of consent is one of the key ways to justify the use of personal information for direct marketing purposes.

Consent held at the time the GDPR becomes law will only remain valid if

- (i) it already meets the existing standard of consent defined in the directive
- (ii) the manner in which the consent was given is in line with the conditions of the GDPR (for example: silence, pre-ticked boxes or inactivity were not used as a means to obtain the consent).

You may consider sending a communication seeking to update consent to GDPR standards. However, bear in mind, in order to send such communications, you should have consent to the current standard required by the DPA – as the act of seeking further consent is itself processing their personal information for a direct marketing purpose.

Review the functionality, and use, of your current CRM

Assess whether your current system will enable you to deliver GDPR compliant fundraising, direct marketing and membership services. Will it enable you to manage the use of personal information for all the different purposes you require? Does it record proof of consent, provide your supporters or donors with self-service, maintain audit trails and identify which user has amended consent fields?

Plan out your steps to GDPR-compliance

Not-for-Profit organisations have made statements on the standards that they expect the GDPR will bring into force in May 2018. You may need to make plans to purchase additional IT equipment, employ additional staff or amend job roles, create staff training and support for adhering to the GDPR. Taking action now will help to evidence your commitment to the GDPR. This will also help protect your valued donors from misuse of their information and help you safeguard your reputation.





About Access

Access is the number one software solutions supplier to the Not-for-Profit sector. Access helps organisations make the most of their funds by delivering integrated organisation-wide solutions. Our software enables you to manage your CRM, membership and fundraising, finances, projects and documents, as well as streamline your HR and recruiting processes.

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About Protecture

Protecture is a team of data protection specialists who help organisations ensure data protection compliance in all areas. Protecture have over 12 years of experience turning the law into practice for charities, schools, local government, corporates and care providers. Protecture work with organisations of all sizes, supporting them with up to date policies and other template documents that are tailored to suit their needs, backed by on-going support, training, external audit.

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