



## Campaigning and GDPR

The EU's General Data Protection Rules come into force on 25<sup>th</sup> May. Among other things, these rules affect how all of us handle personal information which we use in our role as Lib Dems activists. Breaches of the rules could well result in very large fines for the Party, and major reputational damage – we have no option. This document sets out the rules for handling personal data under GDPR in Kingston, based on National guidance.

### What is personal data?

Anything about an identifiable person is personal data, including names, addresses and contact details. The rules apply equally to personal data held electronically or on paper.

This guidance relates to any data you hold in connection with the Liberal Democrats. It does not apply to data you hold about your friends and family.

### General principles

The guidance in this email is based on three main principles:

- Personal data must be held securely at all times
- Personal data must never be shared with any outside organisation without express prior permission. Any transfer must be made securely. Also at this stage, do not share personal data with individual non-members without obtaining specific guidance.
- Personal data must be destroyed when there is no longer a good justification for holding it.

### Paper records

- Take care with paper canvass sheets and other reports which include people's names – losing a few pages of a canvass list is a data breach even if they have not been used yet.
- Securely destroy all paper records once they have served their purpose, for example once any data has been entered to Connect.
- Except in exceptional cases, destroy paper records after 30 days – do not hang onto things because they might be useful in future.
- You can destroy the documents yourself if you have a suitable shredder, otherwise the Lib Dem office at Berrylands Road will do it for you.

### Digital records

Digital records include any form of electronic document, including PDFs. Locally-generated documents, such as spreadsheets for organising ward deliverers and campaigners, are also covered.

- Digital records in Connect or Nationbuilder are considered to be secure.

- If you store any documents containing personal data on your own computer, they must be encrypted – see later.
- At this moment, *none* of the cloud storage platforms have been approved for the storage of personal data by Lib Dem HQ. They are working on it, but there are considerable issues under GDPR with all the main platforms. We are not expecting imminent developments on this, so you must delete all personal data held on Google Drive, Dropbox, iCloud, Microsoft OneDrive etc. by 25<sup>th</sup> May. If it is data that you will need in the future, you can encrypt it on your PC.
- It is sometimes possible to avoid encryption by not downloading or emailing in the first place. If you have a Connect login, you can print paper directly from a PDF in Connect rather than downloading it. You can also access PDFs which other people have generated for you.
- As with paper, you should delete all electronic records once they have served their purpose.
- You must check your computer for old documents which hold personal data before 25<sup>th</sup> May, and delete or encrypt them in line with the guidance given above.

## Encryption

- You must encrypt all personal data stored on your computer.
- Excel and Word documents can be encrypted using the built-in facilities. Note that simple password protection (when available) is not the same as encryption.
- LibreOffice is a quite widely used free alternative to Microsoft Office. It has simple and effective encryption which is explained in the guidance. If you do not have Microsoft Office, you may wish to look at this as an alternative.
- Other documents, including PDFs, can be encrypted in several ways. You can download HQ's guidance on encryption, with examples, from [www.kingstonlibdems.org/encryption](http://www.kingstonlibdems.org/encryption).
- There are a number of other reputable encryption products which are not mentioned in the guidance. For example the Bitdefender Internet security suite has its own facility for creating an encrypted store for files and folders. Based on informal guidance, using tools from any well-established and reputable security software provider is unlikely to present a significant risk.

## Emails

- If you send personal data by email, you must encrypt the file first, as described in the GDPR Encryption Guidance which can be downloaded from [www.kingstonlibdems.org/encryption](http://www.kingstonlibdems.org/encryption)
- You must send the password by a different method, for example, by text or WhatsApp.
- You should change passwords frequently, and not use any password which you also use to access any online services.

If you receive an email with unencrypted personal data, a data breach has already occurred. You must then:

- Inform the Lib Dem data protection officer within 24 hours, at [data.protection@libdems.org.uk](mailto:data.protection@libdems.org.uk)
- Delete the email, including from your Deleted Items / Trash folder.

Reporting the breach to the Data Protection Officer will not necessarily cause the sky to fall in. However reporting it is essential to enable the party to minimise the consequences.

### Doorstep canvassing, surveying etc.

We need to ensure that all information is obtained in a GDPR- compliant way. To achieve this, we need to stick to the following procedure:

- A leaflet must always be offered which contains the Fair Processing Notice listed below:  
*The Liberal Democrats, locally and nationally, may use any information you have provided, including your political views, to further our objectives, share it with our elected representatives and/or contact you in future using any of the means provided. Some contacts may be automated. You may opt out of some or all contacts or exercise your other legal rights by contacting us. Further details are in our Privacy Policy at [www.libdems.org.uk/privacy](http://www.libdems.org.uk/privacy).*
- If a landline phone number, mobile phone number or email address is offered, then say:  
*Thank you sharing your email / phone / mobile. May we use that / them to send you emails / texts in future?*
- If they reply yes, follow with:  
*Thank you. You can unsubscribe from our contacts at any time and more details of your rights are in the leaflet I've given you.*
- The script / data capture form being used for such conversations must include a question for recording that a 'yes' was given, and this data must always be recorded when received. Scripts will in future cover this procedure, but it is essential to remember to use it.
- A very similar procedure will apply to telephone canvassing.
- Contrary to some rumours, non-members WILL be allowed to help with canvassing and surveys. However we are waiting for guidance, and there may be a bit of paperwork. Please do not use non-members for canvassing until you hear more.

I appreciate that we will all, in whatever roles we play as campaigners, need to put some effort into adapting to this. However, there is also a considerable opportunity to improve how we work.

We can reduce the impact of GDPR by thinking more about how we use Connect and Nationbuilder, and reduce the need to re-invent the wheel locally. HQ recognise that this must mean improvements to the main systems. We have the opportunity to lobby for what we want, and I and the rest of the GDPR implementation team are committed to put effort into that. And a lot of this is about disciplines where we were, in fact, taking serious risks under the previous rules.

If you have any questions, please contact me at [s.n.scott@syncrexis.co.uk](mailto:s.n.scott@syncrexis.co.uk) .

**Stephen Scott**  
GDPR Coordinator  
18/05/2018

### For further information:

- The authoritative source for all rules and guidance is on the main Lib Dem website at [www.libdems.org.uk/gdpr](http://www.libdems.org.uk/gdpr)
- The Lib Dem Data Protection Rules were adopted at the 2017 Autumn Conference. [The plain English version](#) is a good starting point for understanding the approach: