

Preparing for the General Data Protection Regulation Data Audit

1. Intro

As part of the [preparations for GDPR](#) the Party has a legal requirement to determine where and how we are collecting, storing and using information, including that which might be used to identify an individual (Personal Data – see Section 7 for an ICO definition).

To meet this requirement, we will be running a Data Audit, beginning on Friday 19th January 2018, which will give the GDPR Project team an understanding of where we might fall short of the incoming legislation.

The Audit questionnaire is designed to help us map the flow of data through the organization including why and how we first bring information into the Party, where this goes and any points where it might leave our direct control. This Guide will help your organization prepare for the Audit.

To be 100% clear; this document is not the Audit. Rather it is intended as a preparatory guide of what to expect.

We do not need specific examples of a campaign or event, just an overview of what information has been gathered through your activities and the methods used to do this.

2. Brainstorm

Set a date where your local party executive can take some time to sit down and go through all the ways that data is collected.

We have very broadly divided all the collection methods into 2 categories; Paper and Online. See below for the terms that we will ask you to work under;

Table 1

Paper	Online
Paper Petition	Online Petition
Paper Survey	Online Survey
Street Stall Sign-up	Online Email Sign-Up
Social Event Sign-up	Other Online Collection
Other Paper collection	Online Form
Phone Canvassing	
Doorstep Canvassing	
Prospect Research	

Consider instances and campaigns where you have used the methods listed above towards a goal. We will not need examples of individual campaigns. We don't want to know about your specific Brexit Focus survey, we do want a detailed overview of the conduct of all surveys.

Paper – Not exclusive to information gathered in hardcopy, includes data collected that can only be added to a digital database by manual entry. For example;

- Doorstep canvassing with responses recorded using MiniVAN
- Hardcopy paper survey returned by post, feedback typed into Connect

Online - Where information has been collected through web based and electronic sources. For example;

- Online Form via a Nationbuilder website to receive updates/newsletter.
- Subscription to a Lib Dem mailing list through an Email Sign-Up

3. Discuss

Turning over every stone and checking all the nooks (let alone the crannies), is not a job that one person can do alone. As such we cannot stress enough how important it is to involve the full Executive in looking at the issue of where Party information is being gathered and held in the round.

Discuss the best way of collecting everything needed to complete the Audit as accurately as possible. To clarify we aren't asking that every single leaflet, Focus, email and petition is trawled through to determine what information has been given.

What will be needed to complete the Audit is an overview of what information was gathered and how it was used and stored.

4. Collect

Look for examples of petitions, canvass cards and online forms that your local party has run and, using *Table 2* below, look at the specific categories of personal data that you have been aiming to collect. The list, based on ICO guidance, is extensive but not necessarily exhaustive;

Table 2

Name	Address
Phone (Mobile and Landline)	Email
Social Media	Website
Voting Intention	Other Topical/Issue based Beliefs
Support for a petition or campaign	Survey Responses
Marital Status	Gender/Gender Identity
Sexuality	Racial/Ethnic Origin
Religious/ Other Beliefs	Bank Details
Other Financial Info	Mental/Physical Health Status
Disabilities	Criminal/Civil Convictions

Our advice is to use a short form to record which categories of information have been collected in relation to different gathering methods. See *Sample Tables 1* and *2* (in Section 6) for an idea of how such might be laid out. Further details of other information you should consider are below;

i. Who has access?

A key part of this Audit is to discover all the filing cabinets, cloud servers and computers that the Party as a whole is storing information in. As such we need you to consider this for your organization.

In your Executive committee think about who has had access to information gathered in the last 10 years and whether copies of it (both paper and electronic) might have been stored in personal computers or filing systems. Also consider which elected officers might have been sent information from LDHQ by email.

See *Sample Table 3* (in Section 6) for an example of how this could be collated.

ii. Fair Processing Notices (FPN)

Fair Processing Notices (FPN) are an absolute legal requirement wherever we are gathering data. They tell people how we will use, store and share their personal data. They are normally found at the bottom of webpages or in dedicated Privacy sections.

Under GDPR we will be expected to provide greater detail about how we use information, and the standard of compliance will be higher. In order to develop guidance to help the whole Party meet this standard we need to know what notice of use we are giving at this point.

If you have a Nationbuilder website you will automatically use the most up-to-date FPN the Party has available in accordance with expert legal advice. Those on Prater Raines you will also be using a uniform Notice, which we will be reviewing with them as part of the project. Even if you use Nationbuilder or Prater Raines, we still need to see examples of the Fair Processing Notice used at the moment and previous versions you may have of these.

FPNs should also be given on all literature that asks for personal data, including political beliefs. Review the Notices given on all literature that information is still held from (including that which has been uploaded to Connect/other systems) and include this in the relevant field of the Audit.

We don't need the same statement multiple times, but do include examples where changes have taken place and indication of whether it was for an Online or Paper gathering method.

iii. Systems/Providers

Make a list of all the systems, providers and software that you might have used to store and process information. A short, and non-exhaustive, sample list of what to look for is below:

Table 3

	Description	Example
Databases	Tools for maintaining accurate data lists with some degree of automation	Connect, Nationbuilder, EARS, Salesforce, Spreadsheets
Web Hosts	Online platforms for building websites, have a data collection function	Nationbuilder, Prater Raines, Wordpress, Wix, 1and1, Focusteam
Cloud Storage	Online file sharing and remote access.	OneDrive, iCloud, Google Drive, Dropbox, Box.com

Providers	Organisations we are giving information to as part of providing a specific paid function.	Print companies, Print societies, Facebook Ads, Twitter Ads, MailChimp, Survey Monkey
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5. Nominate

We are asking that once each local/regional/state party, SAO/AO or HQ department have gathered the required information they nominate a single person to complete the Audit on their behalf.

This will help in terms of tracking what has been submitted to the Audit, this being particularly important given that there could be a need to complete the survey more than once in order to provide a full range of information.

In an ideal world the person nominated would either be a senior member of the Executive (such as Chair, Vice-Chair, Treasurer or Membership Officer) and have a good understanding of how data is used in the organization.

We have written the Audit in plain and easy to understand terms as far as possible. Additional guidance will be available when the online survey is shared before 19/1/18, with a number of online Q&A sessions being held in the following weeks.

6. Examples

Below are a series of example tables for how your organisation might lay out the information it has collected to make the job of the person filling in the Audit survey simpler.

It is vital that information is not submitted to us in any form other than using the Audit link when circulated on 19/1/18.

Sample table 1: Information to be collected in relation to Paper methods.

Method	Example (from local activities)	Data Gathered (refer to categories in table 2)	Storage	Service Providers
Paper Petition				
Paper Survey				
Street Stall Sign-up				
Social Event Sign-up				
Other Paper collection				
Phone Canvassing				
Doorstep Canvassing				

Prospect Research				
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Sample table 2: Information to be collected in relation to Online methods.

Method	Example (from local activities)	Data Gathered (refer to categories in table 2)	Storage	Service Providers
Online Petition				
Online Survey				
Online Email Sign-Up				
Other Online Collection				
Online Form				

Sample table 3: For collating information about Party officers/individuals who have access/store information.

	Name	Email	Role	Membership
Paper				
Online				

Sample table 4: For collating Processing Notices

Method	Information Still Held (Y/N)	Text	Online/Paper

7. Glossary

GDPR – General Data Protection Regulations (*Known in British law as the UK Data Protection Bill*)

DPA – Data Protection Act 1998 (being replaced by GDPR)

FPN – Fair Processing Notice

DPS – Data Protection Statement

ICO – Information Commissioner's Office

DPO – Data Protection Officer (*Mandatory new Data governance role required under GDPR*)

Key Terms

Personal Data (as defined by the ICO) – means data which relate to a living individual who can be identified –

(a) from those data, or

(b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,

and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

Collection Method: means used to gather data (laid out in *Table 1*)