

GDPR FIELD GUIDE

Questions: data.protection@libdems.org.uk

DATA HANDLING IN YOUR CAMPAIGN OFFICE:

Helpers and staff on your campaign who are party members are covered to handle data by Member Data Protection rules and no additional action is needed.

Members are covered by the Party's Data Protection Rules at:

<https://www.libdems.org.uk/gdpr-data-protection-rules>.

Non-member staff (e.g. organisers who are not party members):

The rules on staff and data protection were updated at the Autumn 2018 conference to cover non-member staff and reference to the updated rules will be included in an updated Staff Handbook, which staff will be informed about directly. A copy of the updated rules can be found [here](#).

Once added to the federal party staff handbook, it should be replicated in your local party staff handbook. The local party should bring the change to the attention of the staff member, as we would with any amendment to the staff handbook.

Non-member campaigning:

Non-member volunteers must sign a Non Disclosure Agreement (NDA) when handling personal data that they could hold onto.

Details can be found at <https://libdems.org.uk/dpm-volunteer-nda> and the NDA form is [here](#).

Not all campaign activity requires an NDA:

Delivering addressed mail: This can continue as before, no need for additional action as the volunteer does not keep hold of the data.

Helping with clerical work (at home or in an office): (stuffing envelopes, labelling etc): This can continue as before, no need for additional action as the volunteer does not keep hold of the data.

Canvassing: Non-members must sign a NDA

Blue envelope writing - or any similar clerical task in which volunteers are given a list of personal data (at home or in an office): Non-members must sign a NDA

Completed NDA forms should be sent to: Compliance Department, 8-10 Great George Street, London, SW1P 3AE. Please return them as often as reasonably practical, e.g quarterly along with PPEPRA returns. You do not need to retain a local copy and it is a one-off process for each individual - the NDA does not expire.

As part of the annual audit process, the party's Data Protection Manager will coordinate with local parties to check if anyone retains access to Connect or NationBuilder that shouldn't e.g ex-members.

PRINT LITERATURE

For the full guidance visit www.libdems.org.uk/gdpr

Template leaflets can be found at <https://goo.gl/E7KBz5>

Any printing company you want to use to print **addressed mailings** and/or **addressed leaflets** must have been through the national party vetting process and be on the list of agreed suppliers. ****This includes local party print societies that are VAT registered and/or limited companies**.**

If your local party prints leaflets in its own right, i.e. not as a print society, the local party does NOT need to become an official supplier. The local party is covered to handle data under the Members Data Protection rules.

The list of currently approved suppliers is here: www.libdems.org.uk/approved-suppliers

To get a printer onto the list, email the printer and ask them to complete the Supplier Audit at <https://digitallibdems.typeform.com/to/DuUet4> and copy in data.protection@libdems.org.uk to your email.

If the supplier is a large company and you do not have a direct relationship with them, complete the Supplier Audit on their behalf as best as you can. The request will be reviewed and you will be notified of the decision in due course.

At the current time, you should expect the approval process to take 15-20 working days from the submission of the Supplier Audit.

FAIR PROCESSING NOTICES

As before, any leaflet or letter that collects data still needs a data protection statement. The GDPR rules mean that these data protection statements have changed a little bit.

The data protection statement is now called a 'Fair Processing Notice' - FPN.

There are different FPNs to cover the different ways we collect data and the different information we collect. But as before, the FPN must be on the same page as the data collection. It should be a minimum of 9pt in size.

Below is a guide on which FPN notice to use and when. Detailed guidance on data gathering can be found at <https://www.libdems.org.uk/dpm-data-gathering>.

Note: As before, any leaflet or letter will still also need the normal ‘Printed and promoted...’ imprint. The rules on the placement of the ‘Printed, published and promoted...’ element of an imprint have not changed. This must continue to be on the outside of the leaflet and also on any part of the leaflet that is detachable e.g. it must also appear on a cut-off grumble slip. The FPN needs to only appear where data is collected.

CANVASS LEAFLET.

Must include the FPN that covers face-to-face data collection even if the canvass leaflet itself does not collect data.

In Connect: FPN2018FacetoFace

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.

If the canvass leaflet **also** has a return slip which would collect data, that return slip must also have the correct FPN (see below section ‘Leaflet that collects data’):

Note: When canvassing, it is **not** necessary to hand a canvass leaflet over for every person in the household - we just need to show we have been reasonable in gathering the data.

LEAFLET WITH NO DATA COLLECTION i.e has no petition, reply slip, or grumble sheet
No FPN required.

LEAFLET THAT COLLECTS DATA

Leaflets that collect **any** data should include this FPN on the same page as the data is collected.

Emails and phone numbers also require additional consent (see below).

If you return survey/leaflet, the Liberal Democrats, locally and nationally, may use information 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.

Where you ask for an email address and/or phone number you must ****also**** include, directly above where you ask for the information:

Can we keep you updated by email and phone? If you enter your email and/or phone below, we will use them to contact you in accordance with our Fair Processing Notice below and Privacy Policy at www.libdems.org.uk/privacy.

Using this text allows us to use numbers given even if they are TPS-registered.

PETITION

Use the FPN below, **and** specify to whom you plan to submit the petition - this is very important if you plan to hand the petition to somebody.

In Connect: FPN2018PetitionExter

If you return this form/leaflet, the Liberal Democrats, locally and nationally, may use information 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. We will include your name and/, address and signature [if applicable] when submitting the petition to *****NAME*****.

If a survey also contains a petition, you only need to include the petition FPN.

If someone signed a petition to stop the closure of a hospital ten years ago, we can continue to use that information e.g. informing them it's under threat again. Sending them physical mail is always fine; emailing them is fine if they met the reconsent criteria on May 25th 2018.

SURVEY

Use the standard FPN below, then see further guidance if you are asking for information that falls within one of the Special Categories.

In Connect: FPN2018Survey

If you return survey/leaflet, the Liberal Democrats, locally and nationally, may use information 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.

Special category data:

If you are asking personal questions of an individual in any of the following categories

- race;
- ethnic origin;
- religion;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life; or
- sexual orientation

then you must also include a tick box next to the field which says:

Tick here to allow us to use the [****specify category from the list****] data you have provided for our [****campaigns/Diversity Monitoring****].

Note: This is **only** needed if you are asking for specific personal data about that individual - this draws the distinction between personal information/data and a personal viewpoint/opinion.

For example:

Q: Have you visited your local doctor in the last year?

This would require the additional tickbox above - it is asking a personal question about the health of that person.

Q: How do you rate the health services in your local area?

This would NOT require the additional tickbox, just the normal survey FPN - it is asking that person their opinion of local health services.

Consent for special category data **and** email consent, **must** be recorded in Connect. Please refer to Quick Sheet 2.5 in the Connect Quick Sheets at https://www.libdems.org.uk/connect_quick_sheets for details.

UNSOLICITED DATA

We **CAN** record and use **political opinions** sent or given to us even without the voter having seen a Fair Processing Notice. This includes letters or emails sent us, political comments written on leaflets and sent to us and comments made on the doorstep even if we do not have chance to hand over a leaflet.

Example: a voter hears Vince Cable on the radio and writes to the local party to say she's now voting for us. You can record that voting intention in Connect.

However, you CANNOT record phone numbers/email addresses provided without the right FPN. We would need to seek permission to collect and use this information.

If an individual objects to us processing at any point, the processing must stop.

MEMBER COMMUNICATIONS:

We can continue to write to and phone party members as before.

The party has decided that where we ask members for **special category data**, we should ask for consent in the same way we would with non-members i.e with a tick box.

MEMBERSHIP FORMS

Updated Membership forms can be found at <https://www.libdems.org.uk/membership-forms>

RECORDING THE DATA IN CONNECT:

After making sure we use the right FPN on our campaign materials, the next step is to make sure we record the data accurately in Connect.

As seen above there are four different FPNs for the various gathering methods. Whenever you collect consent you should answer the consent question **and** mark which FPN you used in Connect. Please refer to Quick Sheet 2.5 in the Connect Quick Sheets at https://www.libdems.org.uk/connect_quick_sheets for details.

Surveys/Petitions are split slightly depending on whether you might pass the data on to an external third party.

When creating your scripts to enter data, you must make sure that the right FPN is included in your script so that the person entering the data can record consent has been given.

You do not need to keep copies of surveys or petitions once the data and relevant consent information has been entered into Connect. In fact, we encourage you not to keep such data around once it has been input.

Note: If a postal vote application is returned to your office/team you CANNOT record any of the information on it unless the form has the correct FPN on it. **You should be following already documented best practice with postal vote recruitment.

Below is information on the four FPN statements in Connect:

292266	Both	2019	Action	FPN2018FaceToFace	Leaflet containing following text must be given to the voter: 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 . [LDFFC01] And say: 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.	■
292745	Both	2019	Action	FPN2018PetitionExter	If you return/submit this form/survey/leaflet, the Liberal Democrats, locally and nationally, may use information 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 . We will include your name and/, address and signature [if applicable] when submitting the petition to NAME. [LDNVPC01]	■
292268	Both	2019	Action	FPN2018Phone	You can unsubscribe at any time and full details of your rights are in our privacy policy on LibDems.org.uk . [LDTSC01]	■
291807	Both	2019	Action	FPN2018Survey	If you return/submit this form/survey/leaflet, the Liberal Democrats, locally and nationally, may use information 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 . [LDNVC01]	■

ONLINE CAMPAIGNING:

WEBSITES

If you use one of the party's preferred suppliers, much of the work to comply with GDPR is done for you. If you use other platforms, there are steps you **MUST** take. You should read the guidance at <https://www.libdems.org.uk/dpm-websites-social-media> to ensure you have taken any steps necessary.

SOCIAL MEDIA (NOT ADVERTISING)

Do not collect any data from social media without consent and only where there is direct interaction with a Liberal Democrat account.

If you see a tweet or post from a neighbour on their own timeline or in a community group saying they are voting Lib Dem, you **cannot** record or use that data. However, if someone posts on your candidate page or tweets at you that they are voting for you, you **can** record and use that data **if** you get consent.

Administrators of relevant social media accounts, including Pages and Groups, should be members of the Liberal Democrats and follow the guidelines at www.libdems.org.uk/dpm-websites-social-media.

An EU Ruling means that the Party is considered to be a joint data controller of Facebook Groups and Pages that we manage. You should make this clear by following these instructions:

Facebook pages:

- Go to your Facebook Page and click on About on the menu at the left hand side
- Click on "Our Story" on the right hand side
- Click on the Edit button at the bottom
- Change the title to "Our Story & Data Protection"
- Add the following Fair Processing Text to the Story:
- " This Facebook Page is managed by the Liberal Democrats and we are joint Data Controllers along with Facebook. We will not collect or process any data from this page without your consent. Further details are in our Privacy Policy at <https://libdems.org.uk/privacy>"
- Click Publish

Facebook groups:

1. Create a new post with the content:
2. "This Facebook Group is administered by the Liberal Democrats and we are joint Data Controllers along with Facebook. We may process information you provide when applying to join the group to confirm your eligibility. We will not collect or process any further data from this group without your consent. Further details are in our Privacy Policy at <https://libdems.org.uk/privacy>"
3. Click Post
4. Click on the "... " in the top right hand corner of the published post
5. Select "Mark as announcement"

TWITTER

Edit the bio of your account and add the link to <https://libdems.org.uk/privacy>

CONSENT ON SOCIAL MEDIA

To collect consent, reply to the comment, post or reply, with the following wording:

Facebook Pages and Groups we manage where the Fair Processing is displayed
"Thank you for expressing your opinion. We would like to record this opinion/keep you up to date with our work*. If you are happy for us to do so, please send me your name, postcode and email address* by Direct / Private Message"

* Delete as appropriate

Other social media where the FPN is not displayed:

"Thank you for expressing your opinion. We would like to record this opinion / keep you up to date with our work*. If you are happy for us to do so, please send me your name, postcode and email address* by Direct / Private Message. This will be processed in accordance with our Privacy Policy at <https://libdems.org.uk/privacy>"

* Delete as appropriate

EMAILING:

You can store emails in NationBuilder, Prater Raines or MailChimp. If you use MailChimp you must let the national party know and provide access to the account. You do so here: www.libdems.org.uk/mailchimp-authorisation.

Old emails have not been removed from **Connect** yet. Do not delete emails from Connect at a local level as you would be unable to re-enter them at a later date.

You can keep email addresses held on **NationBuilder** that match our consent guidelines, i.e.:

- 1.They have not unsubscribed from receiving emails.

AND

- 2.They engaged with an email by either opening or clicking a link in an email during the last 12 months OR

- 3.We can prove a GDPR compliant consent has been granted OR

- 4.They have made a donation of £500 or more in the last 5 years OR

5. They provided consent during the re-consent campaign prior to 25th May 2018

Fresh consent to use an email address is required every 15 years. However in that period, we must continue to engage the individual, keep the email address up to date, and **always** provide an opt out link in every email.

When you gather new emails you need to apply two question responses in Connect. One to say consent has been given, the other to confirm which version of the FPN has been shown to the voter. These questions are in the national scripts. More information on this and how you then export addresses to your email platform (MailChimp, NationBuilder etc) can be found in the Quick Sheet 2.5 Storing Content.

ONLINE SURVEYS:

Nation Builder and Prater Raines can be used for simple online surveys. For more complex surveys, Typeform is the recommended solution. They are on the party's list of approved suppliers. Please check that the party's FPN is included, and consent obtained to contact them in future via email and/or telephone.

SIGN UP TO EMAIL LISTS:

If you have an online form specifically to sign up to an email list, someone entering their email address and submitting it to you is sufficient consent. You do not need them to also tick a checkbox.

Close to the email field you should include the text:

“We’d like you keep you up to date on our work. Enter your email address to allow us to contact you in future.”

ONLINE PETITIONS:

Nation Builder and Prater Raines can be used for online petitions. Please ensure that the party’s FPN is included and you get consent for using email addresses for campaigning, other than about this specific petition.

Use the following FPN **and** specify to whom you plan to submit the petition - this is very important if you plan to hand the petition to somebody

If you submit this form, the Liberal Democrats, locally and nationally, may use information 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 [hotlink to www.libdems.org.uk/privacy].

We will include your name and/, address and signature [if applicable] when submitting the petition to **NAME**.

PHONING:

You are still able to call mobile and landline numbers you hold, unless they are TPS-registered - this includes numbers collected under the old data protection wording. TPS numbers remain in Connect so you must filter them out when creating a phonebank. See Quick Sheet 'Non-TPSNumbers-CM'.

Going forward, if you have the following text on your leaflet directly above where you collect a phone number, you can use that number even if it is TPS-registered.

Can we keep you updated by phone? If you enter your phone number below, we will use it to contact you in accordance with our Fair Processing Notice below and Privacy Policy at www.libdems.org.uk/privacy

If someone gives you their number on a petition about potholes and you have used this text, you can call them about anything, not just potholes.

openVPB is not GDPR compliant in its current form and will not be available until VAN have made changes to make it so.

We expect to be able to buy phone numbers in the future but it is dependent on getting a new contract in place with GB Group. Please do not buy telephone numbers until that contract is in place.

SMS

We do not have consent to send SMS to any numbers that we hold. So please do not send marketing text messages under any circumstances.

STORING/SENDING DATA

For full instructions visit <https://www.libdems.org.uk/dpm-encryption>

You should aim to download, use and then delete data. Do not keep data around for any longer than necessary.

Files on your computer/phone/tablet that contain personal data should be encrypted. You can either encrypt files individually or encrypt your whole disk. Instructions are at the link above.

For Windows users, we recommend using 7-Zip to encrypt individual files. Mac users should use Keka.

Apple mobile devices - iPhones and iPads - offer full-disk encryption as standard. For Android tablets/phones consider if you download and store personal data on the device. If, for instance, you only use them to access minivan, there is no need to encrypt the whole device.

When you send personal data, i.e a mail merge file to a printer or fellow party member, you must encrypt that file and you must send the password by a different means. So if you email the data, send the password by text.