

GDPR for 12-step groups / service bodies (in 12 steps)

1. Anonymity is the spiritual foundation for all our traditions, and so will guide us in how we process personal data.

What is personal data?

2. Personal data is anything that is capable of identifying someone, including their name (obviously!) but also a personal email address, phone number, address and (in the internet world) IP address.

What is 'processing'?

3. 'Processing' means to do **anything** with personal data, including recording it (e.g. in a group WhatsApp, or in a 'we care' sheet, or a record of sponsors), sharing it (e.g. on a flyer, or 'Find a Meeting', or giving a phone number to a newcomer), using it (e.g. sending emails) or deleting it.

Who needs to comply with the rules on data protection?

4. The rules on data protection apply to groups / service bodies but not to individual fellows who receive and use personal information just for themselves and their personal use. So, for example, a fellow giving their number to a newcomer is not affected by data protection. However if the group collects numbers from regular meeting attenders and puts these on a flyer for newcomers then this will be covered by the rules on data protection.

What do groups need to do?

5. There will need to be a contact person within the group / service body who is responsible for data protection, this can be one of the service committee.
6. Before recording someone's personal information, work out:
 - a. **Do** you have the person's consent?
 - b. **Why** are you gathering this information? (It must **ONLY** be used for this purpose)
 - c. **Will** it need updating, and how will it be kept up-to-date?
 - d. **Who** will you share it with?
 - e. **How** it will be kept secure?
 - f. **When** will it be deleted?

What rights do individuals have?

7. At the point when their personal information is taken, the individual must be given the answers to the questions 6. b-f above (why, will, who, how, when). This can be either in a written notice, or on a website or sign (e.g. inside a 'we care' book there can be a standard notice for people to read). They should also be told that they can withdraw their consent at any time, and that they can ask for their data to be deleted.

8. At any point, an individual can ask to be told what data a group / service body holds about them, and can also ask for a copy, and for it to be deleted. If they ask to see their data they should also be given the information in question 6b-f (why, will, who, how, when).
9. Anyone can complain to the Information Commissioners' Office if they have concerns or complaints about data protection. The ICO can be contacted on **0303 123 1113**. Google '*contact ICO*' for more options and to learn about complaints.

How complicated does it need to be?

10. Special rules apply if information is shared outside the European Union. If you are a group / service body that will be sending information to other service bodies outside the EU then you will need further guidance. Also, if you are sharing the personal data with a third-party data processor (e.g. website, online platform such as a newsletter mailer) then you will need to have a data processing agreement with that third party which is compliant with the data protection rules.

What if something goes wrong?

11. If personal data is lost, stolen or shared with someone who should not have had access to it then this will be a data breach. You will need to inform the Information Commissioners' Office (ICO) and also the people whose data has been compromised.

The easiest way to comply

12. The easiest way to comply with data protection rules is to gather as little personal information as possible. For example:
 - a. Rather than using personal email addresses for service committee positions, have generic ones that do not contain personal data (e.g. 'secretary@nwarea.com'). This has the added bonus of meaning that email addresses can be handed on at the end of a service commitment with continuity and without loss of saved emails.
 - b. If a group has a 'we care' book then this can be replaced with a sheet which is circulated during the meeting, and then destroyed at the end. Photography of the sheet could be prevented, so that fellows note down individual numbers rather than taking a picture of the sheet that may never be deleted.
 - c. In committee minutes use only first names, and don't include mobile phone numbers or other personal information.
 - d. Only set up a group WhatsApp with the express consent of all members. Have an active administrator who can remove members who are no longer active in the group, or who want to be deleted. Remember that people may have their WhatsApp telephone number linked to their full name, and so they may be unintentionally breaking their anonymity by joining a group.
 - e. Be extremely careful with social media. Consider carefully whether a group needs a social media presence, and if so, how it will be run so as to preserve anonymity of fellows.