



Womens' Royal Army Corps Association

Data Protection Policy

Date approved	14th July 2026
Responsible officer	Chief Executive Officer
Restrictions	None
Application	All

Registered Charity 206184



14th July 2026

WRAC Association Data Protection Policy

Policy information	
Organisation	The Women's Royal Army Corps Association is registered with the Information Commissioner's Office under registration reference ZA115848. The Certificate is renewed annually, paid via direct debit, and displayed on the website.
Terms used in this Policy	WRACA – Women's Royal Army Corps Association ATS – Auxiliary Territorial Service ICO – Information Commissioners Office Ben Fund – (ATS & WRAC) Benevolence Fund NI – National Insurance TRBL – The Royal British Legion SSAFA – Soldiers, Sailors, Airmen and Families Association (The Armed Forces Charity) ABF – Army Benevolent Fund
Scope of policy	This policy only applies to the WRAC Association (national branch/head-office and its Area Coordinators), as registered with the charity commission (206184) (and ICO under registration reference ZA115848). The data held and processed by The Association is for 'Legitimate Purposes' (ie in order to fulfil the charity's obligations, objectives and purposes). All WRAC Association Branches are independent of the national Association, its Charity Commission account and ICO registrations. Advice will be issued to Area Coordinators and Branch Organisers, particularly in relation to privacy statements and sharing/not-sharing of members information.

	The Association uses external agencies for staff payroll and all such external agencies are required to provide a copy of their Data Protection Policy, but does not engage or employ any other data processors.
Policy operational and review dates	The WRAC Association Data Protection Policy is operational from May 2018 and will be reviewed every three years by the Board of Trustees, or sooner by the CEO if required by changes in legislation or organisational circumstances. Minor amendments were made in July 2020 to confirm status of Area Coordinators, as part of Headquarters Charitable organisation, and therefore their being covered by this Policy.

Introduction	
Purpose of policy	The Association holds data such as to legitimately conduct its business – liaising with Members (inc Trustees and Benevolence Fund beneficiaries), staff and contractors – and to comply with Charity Commission and other Regulatory Reporting requirements. This policy is to ensure that: - Any data held and processed by The Association is for ‘Legitimate Purposes’ as recognised by the ICO (ie in order to fulfil the charity’s obligations, objectives and purposes). - The data held will both comply with the relevant law currently in place as well as follow good practice for an organisation of the Association’s size and purposes.
Types of data	The data the Association holds includes: Contact details for: Members Trustees Membership Council Area Coordinators Branch Organisers (or contacts) Benevolence Fund beneficiaries Staff Contractors Contact details include: Name Address Telephone Email (if they have one) Staff NI & bank details Employment information (Where special category personal data is processed, the Association will ensure an appropriate lawful basis and additional safeguards are applied.) Nature of contractors’ business Benevolence Fund data includes: Beneficiary’s contact details Brief note on purpose of grants awarded. (In all benevolence cases this information is as supplied to the Assoc. by the associated case-worker organisations, e.g. TRBL, SSAFA, ABF. The Assoc. does not deal with beneficiaries directly, only through / with approved third-party organisations). This data is used by: Association Staff Association Officers (Vice-president, Membership Council, Trustees, Committee Chairs, Area Coordinators) under specific circumstances and with appropriate permissions,

	• Editor of <i>Lioness</i> (Members') magazine
Policy statement	The Association will respect individuals' rights and not disclose to <i>any</i> third party without the express permission of the data subject. The Association will be open and honest to all data subjects about what data it holds on individuals. The Association will provide appropriate training and support to staff in the handling, storage and destruction of data information. Any personal data breach will be assessed promptly by the Data Protection Officer and, where required, reported to the ICO within statutory timescales. The Board of Trustees will receive periodic assurance regarding data protection compliance, data breaches and significant data protection risks.
Key risks	The key data risks within the WRAC Association are: • Data being shared inappropriately. • Individuals considering themselves harmed through data not being updated, thereby being inaccurate or insufficient. However, the Association relies on Members (or associated case-worker organisations, eg TRBL, SSAFA, ABF, in the case of benevolence) to inform it of changes in circumstances, eg contact information. The Association will not change data of its own volition. • Individuals' information being stored or shared inappropriately. (eg external contractor). Mitigation of these risks is considered throughout this policy.

Responsibilities	
The Trustees Board	The WRAC Association Board of Trustees have overall responsibility for ensuring the Association complies with its legal obligations – delegated to the Board of Trustees and Finance & Governance Officer.
Data Protection Officer	The WRAC Association nominated Data Protection Officer is the Finance & Governance Officer.

	Responsibilities will include: • Briefing the Board on Data Protection responsibilities; • Reviewing Data Protection and related policies; • Advising and training other staff on Data Protection issues; • Notification to, and liaison with, the ICO; • Handling subject access requests; • Consider, and approve if appropriate, unusual or controversial disclosures of personal data.
Employees & Volunteers	All staff and appropriate volunteers will be requested to read, understand and accept this Policy and associated procedures. All appropriate staff and volunteers will be given training. All Area Coordinators and Branch Organisers will be made aware of this Policy and the procedures that relate to the handling of personal data – and that personal data cannot and will not be shared outside of the Association office without the express permission of the data subject.

Security	
Security measures	All data is held on a computer, regardless of how it is received and will be securely stored on computers, which can be shared (by Association Staff, Area Coordinators and Trustees only) using the internally set-up, cloud-based IT-system. The data-storage systems used (Capsule and Salesforce) hold information in encrypted form. Passwords are required to access all computers/laptops. Any hard-copy and/or additional financial data will be securely stored in locked cabinets at Headquarters and securely destroyed as per annual accounts requirements.. Data relating to ‘lapsed’ Members is stored in a ‘lapsed’ Member file for two years. After two years information will be ‘archived’ and only be held for Annual Accounting purposes and for the duration required by law (7 years). Data relating to Benevolence Fund beneficiaries is held on a separate data system (Salesforce) accessible only by the Grants Officer, Finance & Governance Officer and Chair of the Ben Fund. All information received and recorded here is as supplied by associated third-party case-worker organisations (e.g. TRBL, SSAFA, ABF).

	Association data can only be accessed by Association staff, Area Coordinators and the Vice-president. Benevolence Fund data can only be accessed by the Grants Officer, Finance & Governance Officer and the Ben. Fund Chair.
Data sharing	The Association undertakes not to share any information with any third party (except where required for statutory and regulatory reporting requirements). Certain information (such as enquirers' or Members' contact details) will only be shared with Branch Organisers if express permission has been given by the data subject (ie enquirer or Member). NO benevolence fund information will be shared with any branch and/or areas.
Business continuity	Since information is held on cloud-based IT programmes, should there be issues with the physical office becoming unusable, access will still be possible by the staff and Vice-president, in line with physical, office-based procedures.

Data recording and storage	
Accuracy	The Association endeavours to ensure all data is accurate and up-to-date, but it relies on Members (or associated third-party case-worker organisations (e.g. TRBL, SSAFA, ABF) in the case of Ben. Fund beneficiaries) to update on individual data (eg change of address). The WRAC Association will not undertake research to verify the accuracy of data information given to it. Amendments received by email will be appropriately actioned and recorded. Amendments received by hard-copy (e.g. letter) will be appropriately actioned and scanned, with the hard copy being securely destroyed.
Updating	

	The Association relies on Members (or associated case-worker organisations, eg TRBL, SSAFA, ABF, in the case of benevolence) to inform it of changes in circumstances, eg contact information. The Association will not change data of its own volition. Staff information will be retained for the period of employment and six years afterwards, to comply with statutory and regulatory reporting requirements (beyond which it will be securely destroyed). CV's of unsuccessful applicants will be destroyed within six months of application, unless alternative permission has been sought from candidates.

Individual's Rights	
Responsibility	The Association will comply with UK GDPR Data Protection Act 2018 requirements to allow individuals the right to: • Access • Rectification • Erasure • Restriction • Objection • Data portability (where applicable) • Complaint to the ICO This will usually be carried out by Association staff as promptly as possible (and definitely within one month).
Procedure for making an access request	Right of access requests must be in writing, whether by email or letter. All such requests will be provided free of charge – unless there is deemed to be an unnecessary number of requests from one individual, when a small administration charge will be levied. The Association will check a data-subject's identity before handing over information, if they are not known (to ensure there is no breach of data protection)

Transparency

Commitment	The WRAC Association will ensure that Data Subjects are aware that their data is being processed / held / stored and: ○ Why it is being processed; ○ That no disclosures will be made outside the Association; ○ How to exercise their rights in relation to the data.
Procedure	The Association will inform data subjects of why and how data is processed by: ● Employees - the Staff handbook; ● Members and volunteers – on the Membership Application Form and in the welcome letter, along with occasional reminders in the <i>Lioness</i>; ● Trustees, Membership Council members and Area Coordinators – in the Induction Pack, along with occasional reminders in Agendas, etc. These will also be supported by information on the Association website.
Privacy Statement	The WRAC Association has a Privacy Statement in place, supporting this Policy (see Appendix 1) Access to this Statement will be available to all data subjects on the Association website and emails.

Lawful Basis	
Underlying principles	The WRAC Association holds subject data in order to carry out the Association's 'legitimate business' of running and managing a Membership Organisation and Benevolence fund. The Association's 'legitimate business' includes: 1) Keeping in contact with Members (one of the Association's key purposes) through: ● the Member's magazine (<i>Lioness</i>) – distributed twice a year by post, email and available through 'talking newspapers'. Archive versions are also available through the Member's Area of the Association's website. ● Emails to Members – to pass on news, event-ticket offers and details, gather opinions on certain subjects ● Telephone – in response to specific enquiries, queries or to pass on specific information; ● Social media – to pass on news and views. 2) Liaising with Council and Trustees for: ● Agendas, Minutes and associated papers.

	• Ascertaining decisions between meetings (the Association will encourage all email correspondence to be carried out using the Association email address, and / or 'blind copy' emails); This will primarily be by email, and occasionally by post. All New Members (those joining after May 2018) will be required to consent to the Association holding and processing their data as part of their joining the WRAC Association. This Consent includes choosing preferred ways of receiving notifications from the Association (email, post, phone). All WRAC Members as at May 2018 were contacted seeking their specific consent for the Association to contact them using email, post, phone. Photography: The Editor of <i>Lioness</i> will consider all photos sent for consideration for publication in the magazine to have the permission of those in the photograph for its reproduction. Branches will be encouraged to ask people if they do not wish to be included in a photo. Paid staff: Pay and manage personnel In ALL cases, Members, Staff and others will be made aware that the WRAC Association will not share data with any third person organisation or individual. Should such sharing be required (for press and media purposes) each data subject will be approached to give specific permission. No permission given will mean no data will be shared.
Withdrawing consent	The WRAC Association acknowledges that data subjects can withdraw their consent, or the consent for a specified method of contact, at any time (but not retrospectively). However, the Association will hold Membership records and staff records information for 6 years, after membership has been given up or an employee contract has been resigned unless it is required for legal purposes.

Employee training & Acceptance of responsibilities	
Induction	The WRAC Association will ensure that all those staff (including appropriate volunteers) who have access to any personal data will have their responsibilities outlined during induction procedures. This will include: - Paid staff - Vice-president - Trustees - Membership Council All staff and volunteers will be expected to understand and accept their responsibilities under this Policy, which will be available on the Association computer system and Intranet.
Continuing training	All WRAC Association staff and volunteers who have access to, and process, personal data will be reminded of their responsibilities during training, team meetings, staff appraisals, etc.

Policy review	
Responsibility, procedure and timing	The WRAC Association Data Protection Policy is operational from May 2018 and will be reviewed every three years by the Board of Trustees, or sooner by the CEO if required by changes in legislation or organisational circumstances.

More information on GDPR and data protection) can be found at the ICO website:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/> [UK GDPR guidance and resources](#) | [ICO](#)

Appendix 1: WRAC Association Privacy Statement

Introduction

The Women's Royal Army Corps Association ("the Association", "we", "our" or "us") is committed to protecting your personal information and handling it responsibly.

The Association is registered with the Information Commissioner's Office (ICO) under registration number ZA115848 and complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Privacy Statement explains what personal information we collect, why we collect it, how we use it, how long we keep it, and your rights in relation to that information.

This Privacy Statement applies only to the WRAC Association (Headquarters and Area Coordinators) as registered charity number 206184. Individual WRAC branches are independent organisations and are responsible for their own data protection arrangements.

The Association does not sell personal information and does not share personal information with third-party organisations or individuals except where necessary to fulfil our charitable purposes, comply with legal obligations, or where you have given your consent.

Why We Hold Personal Information

The Association holds personal information in order to fulfil its charitable purposes and operate effectively.

This includes:

- Supporting women who have served in the Auxiliary Territorial Service (ATS), Women's Royal Army Corps (WRAC), and successor organisations.
- Encouraging comradeship, friendship, community support and the preservation of shared history and traditions.
- Maintaining membership records.
- Communicating with members through the Lioness magazine, newsletters, email updates and other Association communications.
- Organising and administering events and activities.
- Supporting Area Coordinators in maintaining contact with members and branches.
- Administering volunteers, trustees and staff.
- Managing the ATS and WRAC Benevolence Fund.
- Managing financial records, subscriptions and Gift Aid claims.
- Meeting legal, regulatory and governance obligations.

What Information We Hold

Depending on your relationship with the Association, we may hold:

- Name.
- Postal address.
- Telephone number.
- Email address.
- Membership details.
- Trustee, volunteer or staff records.
- Financial information required for employment, subscriptions, Gift Aid or grant administration.
- Correspondence and communications with the Association.

Benevolence Fund Information

Information relating to Benevolence Fund beneficiaries is normally provided through recognised case-working organisations, including organisations such as SSAFA, the Royal British Legion and the Army Benevolent Fund.

This information is held separately and access is restricted to authorised personnel responsible for administering benevolence grants.

Our Lawful Basis for Processing

The Association processes personal information under one or more lawful bases permitted by UK GDPR, including:

- Legitimate Interests – to operate and administer the Association and maintain contact with members.
- Contract – where processing is necessary to provide membership services or fulfil obligations to staff or contractors.
- Legal Obligation – where we are required to comply with legal, regulatory, accounting or employment requirements.
- Consent – where consent is required for specific activities.

How We Contact You

When you become a member of the Association, we collect your contact details so that we can communicate with you about Association activities, services and opportunities.

We will ask you to indicate your preferred methods of contact, which may include:

- Post.
- Email.
- Telephone.

We may also use email communication platforms, such as Mailchimp, to distribute newsletters, event information and Association updates to members who have chosen to receive such communications.

You can change your communication preferences at any time.

Sharing Information

The Association does not sell or share personal information for marketing purposes.

Personal information will only be shared:

- With trusted service providers acting on behalf of the Association.
- Where required by law or regulation.
- To protect an individual from harm or support safeguarding responsibilities.
- To administer Benevolence Fund grants through recognised case-working organisations.
- Where you have given your consent.

Information relating to Benevolence Fund beneficiaries is never shared with branches or other members.

Website Use and Cookies

The Association website uses cookies and website analytics tools, including Google Analytics, to help us understand how visitors use the website and to improve the information and services we provide.

The information collected through analytics does not normally identify individual visitors.

You may control cookies through your web browser settings.

How We Store and Protect Information

The Association takes appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse or disclosure.

Personal information is stored securely using password-protected and encrypted systems where appropriate.

Access to personal information is restricted to those who require it in order to carry out their role.

How Long We Keep Information

We keep personal information only for as long as necessary.

Membership records are retained while membership remains active.

Where membership lapses, records will normally be retained in a lapsed-member category for two years before being archived, subject to any legal or accounting requirements. Where membership is given up, the Association will hold Membership records for 6 years, unless it is required to be held for longer for legal purposes.

Information relating to unsuccessful job applicants will normally be retained for six months before secure deletion.

Employee records will normally be retained for six years after employment ends, or longer where required by law.

Financial and accounting records will be retained in accordance with statutory requirements.

Your Rights

Under UK data protection law, you have the right to:

- Request access to the personal information we hold about you.
- Request correction of inaccurate or incomplete information.
- Request deletion of personal information where applicable.
- Object to certain types of processing.
- Request restriction of processing in certain circumstances.
- Withdraw consent where processing is based on consent.
- Lodge a complaint with the Information Commissioner's Office (ICO).

Please note that some rights are subject to legal and regulatory requirements and may not apply in all circumstances.

Contacting Us

If you have any questions about this Privacy Statement or wish to exercise your rights, please contact:

Data Protection Officer
WRAC Association
Unit 11, Basepoint
Winnall Valley Road
Winchester
SO23 0LD

Email: info@wraca.org.uk
Telephone: 0300 400 1992

Information Commissioner's Office

If you are dissatisfied with how your personal information has been handled, you have the right to complain to the Information Commissioner's Office (ICO).

Website: www.ico.org.uk
Telephone: 0303 123 1113

Review

This Privacy Statement will be reviewed periodically to ensure it remains accurate and reflects current legal requirements and Association practices.