

# **BRITISH SOCIETY OF TOXICOLOGICAL PATHOLOGY**

BSTP Secretariat  
PO Box 819  
Harrogate  
North Yorkshire HG1 9XF  
UK

Tel: 07894 123 533  
Email: [bstpoffice@aol.com](mailto:bstpoffice@aol.com)  
Web Site: <http://www.bstp.org.uk>



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## **General Data Protection Regulation (GDPR)**

### **BSTP Data Protection Policy**

#### **Introduction**

The British Society of Toxicological Pathology (BSTP) need to gather and use certain information about individuals.

This information can include members and non-members of the society, as well as other organisations, companies and academic institutions who may be interested in receiving information on events organised by the BSTP.

This policy describes how this personal data is collected, handled and stored to meet the BSTP's data protection standards and to comply with GDPR.

#### **Why this policy exists**

This Data Protection Policy ensures that the BSTP:

- Complies with GDPR and follows good practice.
- Protects the rights of members, non-members and interested organisations, companies and institutions.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

#### **General Data Protection Regulation (GDPR)**

GDPR came into effect on 25th May 2018 and describes how organisations – including the BSTP must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with GDPR personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

Under GDPR, the data protection principles require that (in the case of the BSTP) personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals.
- collected for specified, explicit and legitimate purposes.
- adequate, relevant and limited to what is necessary in relation to the purposes for which the information is required.
- accurate and kept up to date.
- kept no longer than necessary, including stored in an archive.

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Registered Charity No: 1043793

President: Silvia Guionaud, Senior Vice-President: Adam Hargreaves, Junior Vice-President: Begonya Garcia,  
Hon. Secretary: Bruce Wilson, Hon. Treasurer: Alys Bradley, Councillors: Peter Hall, Renaud Fleurance  
Chair Education Subcommittee: Ian Taylor, Co-opted Councillor: Serge Zander

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- kept in a manner that ensures appropriate security, including unauthorised or unlawful access or processing.

A full list of requirements can be found on Page 8 of the following document:

<https://ico.org.uk/media/for-organisations/guide-to-the-general-data-protection-regulation-gdpr-1-0.pdf>

## **Policy scope**

This policy applies to all members of the BSTP Council, Education Subcommittee and the BSTP Secretariat. Additionally, it applies to any organisation, contractor, supplier or any other people working on behalf of the BSTP.

The policy applies to all data that the BSTP holds relating to identifiable individuals and can include:

- Names of individuals.
- Postal addresses.
- Email addresses.
- Telephone number.
- Any other information relating to individuals.

## **GDPR risks**

This policy aims to protect the BSTP from data security risks, including:

- Breaches of confidentiality i.e. information being given out inappropriately.
- Failing to offer choice i.e. all individuals should be free to choose how the BSTP uses data relating to them.
- Reputational damage i.e. how the BSTP would respond if unauthorised access was gained to the information it held on individuals.

Anyone handling BSTP data must ensure that it is handled and processed in line with this policy and GDPR principles.

The following people have specific areas of responsibility:

All members of the BSTP Council must ensure that the BSTP meets its legal obligations and is responsible for:

- Ensuring all IT systems used for storing data meet acceptable security standards.
- Evaluating any third-party services the BSTP is considering using to store or process data i.e. cloud storage or computing services.
- Approve GDPR statements attached to any communications i.e. emails, letters, website.
- Ensuring that those able to access data covered by this policy are able to do so in the course of their work.
- Ensuring that data is not shared informally or disclosed to unauthorised people i.e. to other organisations.

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Alys Bradley (the Data Controller) is responsible for:

- Keeping Council updated about GDPR responsibilities, risks and issues.
- Reviewing all GDPR procedures and related policies in line with the agreed schedule.
- Provide GDPR guidelines and if necessary advice for individuals with access to data.
- Respond to requests from individuals (via the BSTP Secretariat) about the data the BSTP holds.

## **Data storage**

GDPR applies to data stored electronically and on paper.

- When data i.e. membership application forms is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.
- When not required, the paper files should be kept in a locked drawer, filing cabinet or office.
- It is the responsibility of all those with access to paper records to ensure that they are not left where unauthorised people can see them.
- When no longer required, paper records are securely destroyed by either cross shredding or by incineration.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared between those requiring access.
- Any data stored on removable media i.e. CD, DVD, USB Memory Sticks should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers and should only be uploaded to an approved cloud computing service with agreement from the BSTP Council.
- Data should be frequently backed up and those backups tested regularly.
- Data should only be saved to laptops or other mobile devices i.e. tablets or smart phones for short term use, long term storage of data is not recommended for these types of devices.
- All servers and computers containing data should be protected by security software and a firewall.

## **Data use**

Personal data is of no value to the BSTP unless the society can make use of it. It is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft.

Those members and non-members of the BSTP working with personal data, should ensure that the data is not shared informally and that the screens of their computers are always locked when left unattended.

Although the BSTP is in contact with similar organisations in Europe and the USA it is the policy of the society **NOT** to pass on details of the mailing list.

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For those members subscribing to online or print versions of the journal, Toxicologic Pathology, when taking out the initial subscription BSTP members are made aware that their subscriber information will be released to the STP and the Publisher to assist with distribution of the journal and that the BSTP will disclose only the minimum amount of information required for the Publisher's purposes. The BSTP have a Memorandum of Understanding (MOU) in place with the STP and the STP contract confirms that with the current and any future publisher they will stipulate that details of BSTP members must not be distributed to third parties and will be used solely for the purpose of delivery of issues of the journal. The Publisher will hold the subscriber lists in confidence and shall not utilise or disclose the subscriber lists except to the extent required to perform its obligations and exercise its rights, without the prior written consent of the BSTP.

## **Data accuracy**

The law requires that the BSTP take reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of those members and non-members of the BSTP working with personal data to take reasonable steps to ensure data is kept accurate and up to date:

- Data will be held in as few places as necessary, additional data sets should not be created or held unnecessarily.
- Every opportunity should be taken to ensure that the data is kept up to date i.e. via meeting registration forms and membership renewal paperwork.
- The BSTP will make it easy for data subjects to update the information the society holds i.e. by means of an email to the BSTP Secretariat or any member of Council.
- Data will be updated as soon as inaccuracies are discovered i.e. if an email is returned 'undelivered' then the email address details will be removed from the database and, where necessary Council informed.

## **Access requests**

All individuals who are the subject of personal data held by the BSTP are entitled to:

- Ask what information the society holds about them and why.
- Ask how to gain access to it.
- Be informed as to how to keep the data up to date.
- Be informed how the society is meeting its data protection obligations.

If an individual contact the BSTP requesting this information, this is called a **subject access request**:

- Subject access requests from individuals should be made by email and addressed to the Data Controller at [bstpoffice@aol.com](mailto:bstpoffice@aol.com).
- The Data Controller (assisted by the BSTP Secretariat) should verify the identity of anyone making a subject access request before handing over any information.
- The Data Controller (assisted by the BSTP Secretariat) will aim to provide the relevant information within 14 days and there is no charge for the information.

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## **Disclosing data for other reasons**

In certain circumstances, GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances the BSTP will disclose the requested data. The Data Controller will, however, ensure that the request is legitimate, seek assistance from Council and where necessary take legal advice.

## **Providing information**

The BSTP aims to ensure that individuals are aware that their data is being processed and stored and that they understand:

- How the data is being used.
- How to exercise their rights.

To this end, the BSTP's Data Protection Policy sets out how data relating to individuals is used and will make this policy available on the BSTP website, and on receipt of an emailed request, make available a copy of the policy as a secured PDF file.

The BSTP Data Protection Policy will be reviewed by the Council of the BSTP annually with the next review due on 1st November 2019.