



DATA BEST PRACTICE

In today's data driven business environment, keeping in touch with supporters and customers and reaching new prospects in a competitive market has never been more important.

The data you hold is an extremely valuable asset to your organisation – ensuring that it remains high quality, and using it well, are paramount to improving your marketing effectiveness and will inevitably lead to an increase in your ROI.

The decay rate of data is rapid – even on a daily basis. Your customers or supporters change postal address, telephone number and email addresses with alarming regularity and not all will take the time to update their records with you. Out-of-date data can create financial, reputational and regulatory risks to your organisation.

Additionally, with the implementation of GDPR (General Data Protection Regulations) in May 2018 the individual has greater rights, and will demand greater clarity on how you collect, store & use their personal details. Keeping your data accurate and up-to-date is a legal requirement, but further, it's the right thing to do.

Data Collection

When collecting data, you should only collect data that you will actually require for the purpose you intend to use it for. For example, to send a mailed catalogue to anyone signing up within a marketing campaign, the only information you would need would be their name and address. Any other information could be classed as superfluous. However, if at the outset you would like to also collect telephone number and email address for future use – then under GDPR you must say so, giving the reason for the collection. Give the individual the opportunity to choose what they receive from you and how often; let them know how long their data will be stored for and any other processing you intend to do so they can decide whether they are happy for their data to be used in this way.

'It is imperative to ensure I, as the data subject, understand the purposes for which I'm giving you my personal details. Make the process clear and unambiguous. Allow me to make informed decisions. Also, make it easy for me to unsubscribe or stop dealing with you if I choose to do so.'

It's very simple. Tell me what you will do, and do only that.'

Article 5(1b) of the GDPR states that personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Further it states that personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are [to be] processed.

Data Accuracy

Ensuring data accuracy for postal use is relatively easy. The Royal Mail owns and maintains the Postcode Address File (PAF); a database of over 29 million UK postal addresses including 1.8 million UK Postcodes.

In the very shortest form an address needs just 3 elements:

- Property number and street address
- Post town
- Postcode

This is sufficient to accurately deliver your item to the intended recipient, however our addresses are made up of many more elements, some of which are more for vanity than purpose. All other elements are generally there to make identifying the "letter box" easier. This is particularly useful in multi-occupancy buildings or business premises.

There are many ways to ensure address data is as accurate as possible, such as:

- Deduplication
- Gone Away Identification
- Bereavement Processing
- Preference Services

Deduplication

Deduplication is the process of removing individuals or organisations from your data list(s) that have more than one entry. This can be particularly important if you are combining lists.

Deduplication can also be used to suppress records which you know you don't want to contact, such as previous responders to an ongoing campaign, or those individuals who have informed you that they don't wish to receive this particular type of communication.

Deduplication can be done at various levels – individual, household, organisation or site.

Gone Away Identification

Verifying the accuracy of your data is an important part of complying with the many parts of data protection law. Utilising a number of industry recognised reference files we are able to accurately identify individuals and business that have moved away which will also avoid unnecessary postage costs.

If you have explicit permission from your data subject to process data by referencing it against enhancement files such as the National Change of Address register (NCOA) you may also be able to find the new address.

Bereavement Processing

Removing deceased individuals from marketing communications not only reduces wasted mail costs but also reduces the risk of causing emotional distress for families. Mailing deceased individuals is unlawful and the cause of many complaints to the Information Commissioners Office. Regular screening against the bereavement files is highly recommended.

Preference Services

There are a number of preference services that enable marketers to ensure that they are not contacting people who do not wish to be contacted either by specific means or in general.

The main preference services are **TPS** (Telephone Preference Service), **MPS** (Mailing Preference Service), **Baby MPS** (Baby Mailing Preference Service), **FPS** (Fundraising Preference Service) & **FPS** (Facsimile Preference Service) - yes there are two with the acronym FPS!

TPS

The Telephone Preference Service is a central opt-out register on which an individual can record their preference not to receive unsolicited sales or marketing calls. **It is a legal requirement that all organisations (including charities, voluntary organisations and political parties) do not make sales or marketing calls to numbers registered on the TPS unless they have explicit consent to do so.**

Organisations' own data can over-ride TPS, for example if you have an ongoing relationship with a donor, customer or supporter it can over-ride their registration

on the TPS register. Also note that the TPS can accept the registration of mobile phone numbers however this will only prevent the receipt of marketing voice calls but not SMS (text) messages.

A TPS registration only prevents marketing calls, organisations will still be able to call for the purposes of genuine market research.

MPS

The Mailing Preference Service Consumer File is a list of names and addresses of consumers who wish to limit the amount of direct mail that they receive. The use of the Consumer File by list-owners and users is a requirement of the British Code of Advertising, Sales Promotion and Directing Marketing administered by the Advertising Standards Authority.

Baby MPS

Similar to the MPS register, but specifically for baby-related mailings. Many parents are happy to hear from companies who can help them at this exciting time in their lives, but, in the sad circumstances of the death of a baby, mailings to parents about baby products from well-meaning organisations can cause unintended hurt.

FPS

The Fundraising Preference Service was launched in July 2017. It allows people to control the nature and frequency of direct marketing communications they receive from fundraising organisations registered in England, Wales and Northern Ireland.

People can choose to stop receiving emails, telephone calls, addressed post, and text messages from a selected charity or charities. It is not currently possible to select "all charities".

Charities are enrolled to the Fundraising Preference Service only if and when the FPS receive a request to block contact. In this event an email will be sent from the FPS to the address listed for the charity on the charity commission website – it is therefore imperative that the charity commission site is kept up to date also.

FPS

The Facsimile Preference Service – with the arrival of email marketing, in the late 90s, this service is now somewhat outdated, however it does still exist! Under legislation introduced in 1999 it is unlawful to send an individual an unsolicited sales or marketing fax without prior permission. Businesses have the opportunity to register on the FPS as they are not covered by this legislation.

If you use Fax marketing you are legally obliged to ensure you do not fax any number which has registered on the FPS register.

Article 5(1d) of the GDPR states that personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

Data processing

Since GDPR came fully into law in May 2018 individuals have far more rights than ever before over their data and how it is used and stored.

‘As previously mentioned the best approach is to tell the individual how you plan to use their data, have them agree and then only do that!’

Article 5(1a) of the GDPR states that personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject (individual).

‘Much of what is acceptable within the field of data processing also comes down to reasonable expectation. As an individual giving personal data I would reasonably expect you to use it to contact me, I would reasonably expect you to process my data for mailings (enabling you to make postal savings) but not to wealth screen me, nor enhance my data with elements that I haven’t chosen to give you myself.’

Data storage

‘It is a reasonable expectation that you will store my data securely and only for as long as you need it to fulfil the purpose for which it was collected or given.’

Data should be stored so that no unauthorised person can have sight of, or use it, for any purpose including those within your organisation and any malicious attempts to access the records.

Data should be encrypted or anonymised to protect the individuals who have given their data.

Unless absolutely necessary data should not be stored on portable devices which carry an inherent risk of being lost or stolen. Where data is accessed by portable devices it would be mandatory to encrypt to avoid access by third parties.

Data should be deleted following completion of the purpose for which it was collected or given.

Article 5(1e) states that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Data Subject Access Requests

Individuals have the right to access their personal data – this is commonly referred to as a Data Subject Access Request or DSAR. Requests can be made verbally or in writing and you have one month to respond to a request. In most circumstances you are no longer allowed to make a charge for providing this information.

On the basis that you will have to supply every piece of information you hold on an individual you should carefully consider what you record and its purpose.

Good information, carefully obtained, sensitively processed and securely stored forms the core of all good marketing – you are only as good as your data practices.

Further information and references

We can provide an audit of your data highlighting any areas where improvements could be made – contact sales@weareyeomans.co.uk to find out more information.

The full General Data Protection Regulations are available to download (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>)

The Direct Marketing Association (DMA) provides many articles on Data Management and Data Protection (<https://dma.org.uk>)

The Information Commissioner’s Office (ICO) is the governing body in the UK for upholding the legislation and provides information to individuals and organisations on GDPR and Data Protection (<https://ico.org.uk>)

If you’d like to talk to us about your data please contact sales@weareyeomans.co.uk or view our website blog page (weareyeomans.co.uk/blog) where you’ll find many interesting articles about various topics including data and details of workshops we are running including those on data best practice.

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