



PROVINCIAL GRAND LODGE OF CORNWALL

GUIDANCE FOR LODGE SECRETARIES: DATA PROTECTION & HERMES

1. HERMES:

The HERMES system is now the single, mandatory platform for managing all core membership, finance, and Lodge meeting data.

- **Principle of Minimisation: You must minimise the retention of member data in local Lodge files.** UGLE guidance states that by storing data securely in HERMES (which is backed up at Freemasons' Hall), much of the compliance burden for security and accuracy is handled for you.

You must resist the temptation to retain your own copies of data, as this may inadvertently lead you to use data that is no longer accurate or, worse, to break the law.

- **Data Accuracy:** Your primary responsibility has shifted to ensuring the data entered into HERMES is **accurate and up-to-date**. All official returns and communications depend on the quality of your HERMES record.
- **System Security:** As a **Primary HERMES User**, you are responsible for maintaining the confidentiality of your account. You must adhere to all UGLE security protocols (e.g., strong passwords, Multi-Factor Authentication (MFA) if required).

2. Role Clarification: Controller vs. Processor

Understanding the relationship between the Lodge, the Province, and UGLE is crucial for compliance.

Entity	GDPR Role	Responsibility in the HERMES World
Your Lodge	Data Controller	Determines the purpose and uses of local Lodge data (e.g., Almoner reports, local committee minutes).
Province of Cornwall	Data Controller	Governs the Province and uses data for its administrative purposes (e.g., Provincial Summonses, fees).
UGLE (via HERMES)	Data Processor	Manages the data storage and infrastructure on behalf of the Lodge and Province. UGLE must follow the documented instructions in the Data Processing Agreement (DPA).

3. Changes to Candidate Processing (Rule 158)

The previous manual process of sending letters or emails to neighbouring Lodge Secretaries for **Rule 158** enquiries is largely **obsolete** for initial eligibility checks.

Former Manual Step (Pre-HERMES)	New HERMES Procedure	Secretary's Action
Manual Application Form P	Online Registration Form (ORF).	Enter the Enquirer's basic details into HERMES to generate the ORF link for them.





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Former Manual Step (Pre-HERMES)	New HERMES Procedure	Secretary's Action
Local Rule 158 Enquiry (Writing to neighbours)	Automated System Check.	No manual action required. HERMES performs a check against the central database for prior applications or exclusions.
Sharing: Data is only shared if the candidate consents to check against neighbouring Lodges.	Sharing: Data is systematically checked and shared with the Province/UGLE upon entry to HERMES.	Ensure the candidate completes the ORE, which includes the consent/notice required for this process.

4. Managing Membership Status & Data Changes

HERMES is designed to automate the notification process, removing the need for separate emails to the Provincial Office for status changes.

Event	Former Procedure	New HERMES Procedure
Change of Address/Contact	The secretary manually updated the local file and notified the Province/UGLE via a paper form.	Immediate Update in HERMES. HERMES uses a third-party validator for UK addresses to ensure accuracy.
Resignation	Letter/oral notice to the Secretary, followed by notification to the Provincial Office.	Secretary records status as 'Resigned' in HERMES. HERMES immediately notifies the Provincial Office and triggers the 60-day withdrawal window.
Exclusion (Rule 181)	The Secretary notified the Provincial Office separately.	Secretary records the Exclusion in HERMES. This automatically updates the member's status across all connected Masonic entities.

5. Handling Data Subject Rights Requests (SARs)

The Province's Data Protection Policy mandates that the Provincial DPO manages all formal requests. Your role is to coordinate the Lodge's response.

Request Type	Secretary's Action	Key Responsibility
Subject Access Request (SAR)	Immediately acknowledge the member and notify the Provincial DPO (secretary@pglcornwall.org.uk).	Local Search: Conduct a thorough search of all local Lodge records (paper minutes, Almoner files, local emails) for data that is <i>not</i> in HERMES.





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Request Type	Secretary's Action	Key Responsibility
Objection/Rectification	Immediately inform the Provincial DPO.	HERMES Rectification: If the rectification relates to a core detail (e.g., address), update it in HERMES. If it relates to a restricted field (e.g., DOB), follow the DPO's instruction on contacting UGLE.
Almoner Records (Special Category Data)	Do not share this data. Only release health-related data upon the DPO's direct instruction, and only after ensuring third-party data is properly redacted.	Maintain the high-security protocols for this sensitive, local-only data (password protected, locked cabinet).

6. Local Security Best Practice (Data NOT in HERMES)

The data stored outside of HERMES, particularly Special Category Data, represents the highest local risk.

- **Delete Obsolete Data:** Regularly review and delete local copies of data (emails, old spreadsheets) that have been successfully entered into HERMES.
- **Secure Storage:** Personal data must be stored appropriately. Almoner reports, and bank details require the highest level of security (e.g., robust password protection, or physical storage in locked filing cabinets).
- **BCC for Group Emails:** When emailing groups of members for Lodge business outside of HERMES, **always use the BCC (Blind Carbon Copy) field** to avoid disclosing personal email addresses to all recipients.

