



NTUC roped in its service excellence team and set up its own Do-Not-Call registry to manage voice calls and text messages to over 800,000 members.

🔒 CHALLENGES

NTUC had to review its policies, systems and processes to fully comply with the PDPA. In doing so, it faced difficulties in interpreting the new law and had to ensure that any new measures would not affect customer experience.

📌 STEPS TAKEN

- Formed its Data Protection Office comprising representatives from IT, legal and service excellence teams
- Developed enterprise-wide data inventory map
- Prepared specific advisories and guidelines for NTUC and its affiliated unions and association.
- Developed new SOPs and service guides, e.g. member retention upon receiving consent withdrawal requests
- Set up its own Do-Not-Call registry
- Trained all employees, union leaders and management staff

👍 BENEFITS

- PDPA provided good data protection framework
- Strengthened data protection measures
- Building trust with union members

LABOUR MOVEMENT LEADS THE WAY IN DATA PROTECTION

MANAGING the personal data of over 800,000 members is no small feat for the National Trades Union Congress (NTUC), a national confederation of trade unions in the industrial, service and public sectors in Singapore.

It currently manages the personal data - such as contact details and employment information - on behalf of 57 unions and one affiliated taxi association.

With the massive amount of personal data under its care, it is even more critical for NTUC to embrace best practices in data protection.

That includes obtaining consent from members to use their personal data to provide services as well as to inform them about membership matters, as required under the data

protection provisions under the Personal Data Protection Act (PDPA).

NTUC also obtains consent to share personal data with its supermarket chain NTUC Fairprice so that members can enjoy shopping rebates, or with the Employment and Employability Institute (e2i) to facilitate job training for members.

Besides obtaining consent from members for such purposes, the NTUC has implemented strict IT policies and other standard operating procedures (SOPs) and data protection policies.

Despite having such practices in place before the PDPA kicked in, NTUC reviewed its data protection measures in early 2013 to ensure compliance with the new law.

Cross-functional team

Under the leadership of NTUC's chief information officer Dr Kwong Yuk Wah, a high-level data protection office comprising representatives from NTUC's information technology, legal and service excellence teams, was formed.

Dr Kwong, who doubles as the labour movement's chief data protection officer, says the service excellence team, in particular, plays an important role to ensure NTUC's data protection measures do not affect customer experience.

"For instance, one of the obligations of the PDPA is to allow the withdrawal of consent," she says. "But if a member withdraws his consent for the use of his personal data for purposes such as facilitating job training, we may not be able to provide such services to him."

That's where the service excellence team steps in to establish SOPs or service guides that require staff to explain to individuals about what a withdrawal of consent means for their membership.

Building data inventory maps

Led by its data protection office, NTUC created an enterprise-wide data inventory map, which details the types of personal data collected such as those of union members, members of its various communities,

union leaders, employees and individuals who enquire about NTUC's services.

The data inventory map also includes details of where data is stored, along with a list of organisations to which personal data could be disclosed, as indicated in NTUC's consent forms.

"We don't pass personal data to organisations that are not included in the data inventory map," Dr Kwong says, adding that all personal data is secured through security and access control systems.

Sofar, NTUC has not had to disclose personal data to organisations that are not found in the data inventory map, Dr Kwong says. "But should the need arise, the names of additional organisations will be added to our map and consent forms."

In drafting the data inventory map, NTUC also referred to the Personal Data Protection Checklist for Organisations provided by the Personal Data Protection Commission (PDPC) to ensure that all data protection measures are met.

Cost Savings through NTUC's Do-Not-Call Registry and Exemption Order

Most of NTUC's calls and text messages to members are often related to membership services.

For the existing base of members prior to 2 July 2014, NTUC has avoided incurring hefty costs to obtain consent by relying on an exemption order for telemarketing messages that lets organisations send text and fax messages on related products and services to individuals with whom they have an ongoing relationship, unless the individual chooses to opt out.

The unions too may send text messages to invite members for events such as dinner and dance, and other union-related activities. "We've set up an NTUC Do-Not-Call Registry specifically for this purpose so that unions can check before sending out such messages. Our registry has records of which union member has withdrawn consent for the sending of specified messages," Dr Kwong says.

Staff training

To get employees and union leaders up to speed on NTUC's data protection measures, Dr Kwong's team developed a comprehensive training programme for 1,800 union leaders, NTUC's top management and 650 employees, including appointed compliance managers in over 20 departments and 57 affiliated unions and one association.

They were trained not just on PDPA obligations, but also on NTUC-specific guidelines and scenarios, such as whether handing over an identity card during membership registration could be considered as deemed consent. All trainees had to pass a multiple-choice quiz.

"We also created an information portal to help staff and union leaders better understand NTUC's data protection policies, advisories and guidelines," Dr Kwong says.

Dr Kwong says there have been no major challenges in complying with the PDPA, except with interpreting various aspects of the law before the PDPC released its advisory guidelines.

"For example, we weren't sure of how we should seek clear and unambiguous consent, a process which we have refined after going through the guidelines," she says. "The best practices in the guidelines also came in handy while we were reviewing our data protection procedures."

By providing a data protection framework, the PDPA has given NTUC the opportunity to ensure its data protection measures are comprehensive, Dr Kwong says.

As compliance is an ongoing exercise, NTUC plans to introduce a new mobile app by the end of this year to help unions register new members without relying on paper forms.

Dr Kwong says: "We want to use more technology to protect the data, to avoid situations when personal data could be exposed when membership forms are misplaced".