

Blewbury Village Hall Executive Management Committee – Privacy & Data Protection Policy

POLICY STATEMENT

Blewbury Village Hall Executive Management Committee (VHMC), the managing committee for the Blewbury Village Hall charity, is committed to a policy of protecting the rights and privacy of individuals. The VHMC needs to collect and use certain types of data in order to carry out the work of managing Blewbury Village Hall.

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of information about people (personal data). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs. This personal information must be collected and handled securely.

The VHMC will remain the data controller for the information held. The members of the VHMC, Blewbury Village Hall staff and other volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR.

If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold, please contact the Chairman of the VHMC.

AIMS

The purpose of this policy is to set out the VHMC commitment to and procedures for protecting personal data. The VHMC regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of Blewbury Village Hall users, contractors, staff and the local community at large.

OPERATION

The Data Protection Act contains 8 principles for processing personal data with which we will comply.

Personal data:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s),
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary,
6. Shall be processed in accordance with the rights of data subjects under the Act,

7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

The VHMC will let people know why we are collecting their data, which is for the purpose of managing Blewbury Village Hall, its bookings, finances (including fundraising), promotions and personnel. It is our responsibility to ensure the data is only used for this purpose. Consent to use personal data will be included on the hall booking forms.

Access to personal information will be limited to trustees, staff and volunteers. Data may be retained for up to 7 years for accounts purposes and for longer where required by the Hall's insurers. Information regarding an employee, or a former employee, will be kept indefinitely. If something occurs years later it might be necessary to refer back to a job application or other document to check what was disclosed earlier, in order that trustees comply with their obligations e.g. regarding employment law, taxation, pensions or insurance.

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, where, what it is used for and to have data corrected if it is wrong. Any SAR will be dealt with within 30 days, as is required, and steps will be taken to confirm the identity of the individual making the request.

We may occasionally need to share data with other agencies such as the local authority, funding bodies and other voluntary agencies in circumstances which are not in furtherance of the management of the charity. The circumstances where the law allows the charity to disclose data (including sensitive data) without the data subject's consent are:

1. Carrying out a legal duty or as authorised by the Secretary of State protecting vital interests of a Data Subject or other person e.g. child protection.
2. The Data Subject has already made the information public.
3. Conducting any legal proceedings, obtaining legal advice or defending any legal rights.
4. Monitoring for equal opportunities purposes – i.e. race, disability or religion.
5. We regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. We intend to ensure that personal information is treated lawfully and correctly.

SPECIFIC ACTIONS

The VHMC has a duty to ensure that appropriate technical and procedural measures are taken to prevent breaches of data security. These measures will include:

1. Physical files containing personal data will be kept in a locked cabinet, or secure area.
2. Personal data stored electronically will be password protected, with a strong password.
3. Computers and devices used to access and process the data will have up to date internet security software installed and operational.
4. Only VHMC members, Blewbury Village Hall staff and volunteers will have access to personal information held by the charity and then only on a need to know basis and having given written assurance that appropriate data security measures are in place and procedures observed.
5. No personal data will be given over the phone unless there is no doubt as to the caller's identity and right to access the information.
6. Information to meet a SAR request will only be released if evidence of identity is provided.
7. Consent to retain personal information will be recorded and updated as necessary.
8. Email correspondence on behalf of Blewbury Village Hall will use a dedicated email account, not personal emails. Emails containing personal information will be saved into appropriate secure folders and deleted from email in-boxes and deleted files folders.
9. Personal data will be stored for only as long as it is needed, or required by statute and will be disposed of appropriately.
10. The general risk assessment for the management and operation of Blewbury Village Hall will make specific reference to data security.
11. Hall accident book records will be removed from the book and stored securely.
12. Data security will be included as a regular agenda item at VHMC meetings.