

HARBOROUGH MAGNA VILLAGE HALL

OSCR Charity Number 1185789
(Old School Community Rooms)

Data Protection Policy

Please note: The Old Schools Community Rooms (OSCR, Charity No. 1185789) operates the Harbourough Magna Village Hall.

1. SCOPE OF THE POLICY

This OSCR policy applies to the management of Harbourough Magna Village Hall (HMHVH). The policy sets out the requirements that the HMVH has to gather personal information for administrative purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the OSCR Trustees to ensure that the HMVH is compliant. This policy should be read in tandem with the HMVH Privacy Policy.

2. WHY THIS POLICY EXISTS

This data protection policy ensures that the HMVH:

- Complies with data protection law and follows good practice;
- Protects the rights of employees, customers, volunteers and hirers;
- Is open about how it stores and processes data;
- Protects itself from the risks of a data breach.

3. GENERAL GUIDELINES FOR COMMITTEE MEMBERS

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the general public, hirers or OSCR trustees;
- Data should not be shared informally or outside of the HMVH;
- The OSCR Trustees will provide induction training to trustees and volunteers to help them understand their responsibilities when handling personal data;
- OSCR Trustees will aim to keep all data secure, by taking sensible precautions and following the guidelines below;
- Strong passwords must be used and they should never be shared;
- Personal data should not be shared outside of the HMVH unless with prior consent and for specific and agreed reasons;
- Customer information should be reviewed and consent refreshed periodically or when policy is changed.

4. DATA PROTECTION PRINCIPLES

The General Data Protection Regulation identifies eight data protection principles:

Principle 1 Personal data shall be processed lawfully, fairly and in a transparent manner.

Principle 2 Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Principle 3 The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.

Principle 4 Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.

Principle 5 Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

Principle 6 Personal data must be processed in accordance with the individuals' rights.

Principle 7 Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Principle 8 Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

5. Lawful, fair and transparent data processing

The HMVH requests personal information from potential customers for the purpose of sending communications about their involvement with the HMVH. The forms used to request personal information will contain a privacy statement informing potential customers as to why the information is being requested and what the information will be used for. Hirers and volunteers will be asked to provide consent for their data to be held and a record of this consent along with their information will be securely held. HMVH customers will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once a HMVH customer's requests not to receive certain communications it will be acted upon promptly and the customer will be informed as to when the action has been taken.

6. Processed for Specified, Explicit and Legitimate Purposes

Customers will be informed as to how their information will be used and the OSCR Trustees will seek to ensure that such information is not used inappropriately. Appropriate use of information provided by customers will include:

- Communicating with OSCR Trustees about the HMVH events and activities;
- Communicating with customers about specific issues that may have arisen.

The OSCR Trustees will ensure that customers are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending HMVH customers marketing and/or promotional materials from external service providers.

The HMVH will ensure that customer's information is managed in such a way as to not infringe an individual's rights which include the right:

- to be informed
- of access
- to rectification
- to erasure
- to restrict processing
- to data portability
- to object.

7. Adequate, Relevant and Limited Data Processing

Apart from the reason for the hire, OSCR will only ask for the following information that is relevant for hiring purposes. This will include:

- name.
- postal address.
- email address.
- telephone number.
- gift aid entitlement.

Where a license is being sought on behalf of the hirer some of this information may be passed to the licensing body

Where additional information may be required, such as health-related information, this will be obtained with the specific consent of the customers who will be informed as to why this information is required and the purpose that it will be used for.

There may be occasional instances where customer data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the customer or the HMVH in the instances where the HMVH has a substantiated concern, then consent does not have to be sought from a customer.

8. Accuracy of Data and Keeping Data up to Date

The HMVH has a responsibility to ensure customer's information is kept up to date. Customers will be informed to let the bookings secretary know if any of their personal information changes.

9. Accountability and Governance

The OSCR trustees are responsible for ensuring that the HMVH remains compliant with data protection requirements and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely.

The OSCR Trustees will ensure that new trustees receive an induction into the requirements of GDPR and the implications for their role.

The OSCR Trustees will review data protection and who has access to information on a regular basis as well as reviewing what data is held. When trustees relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

10. Secure Processing

The OSCR trustees have a responsibility to ensure that data is both securely held and processed. This will include:

- trustees and volunteers using strong passwords
- trustees and volunteers not sharing passwords
- using password protection on laptops and PCs that contain or access personal information
- using password protection or secure cloud systems when sharing data between trustees, volunteers and/or customers
- paying for firewall security to be put onto trustee and volunteers laptops or other devices.

The trustees have scrutinised the Terms and Conditions of each supplier and judge that they are GDPR compliant.

11. Subject Access Request

HMVH customers are also entitled to request access to the information that is held on them, by the HMVH. Any request needs to be received in the form of a written request to the bookings secretary of the HMVH. On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. The HMVH will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

12. Data Breach Notification

Were a data breach to occur action shall be taken to minimise the harm by ensuring all trustees are aware that a breach had taken place and how the breach had occurred. The trustees shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches and the Information Commissioner's Office would be notified.

If a customer contacts the HMVH to say that they feel that there has been a breach by the HMVH, a trustee will ask the customer to provide an outline of their concerns. If the initial contact is by telephone, the trustee

will ask the HMVH customer to follow this up with an email or a letter detailing their concern. The concern will then be investigated by trustees who are not in any way implicated in the breach. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Agreed by OSCR Trustees: 29th July 2020
Policy review date: July 2021

DGJ 30/07/20