Privacy Policy Ramsbury Memorial Hall

Data Protection Policy and Procedures Introduction

We are committed to a policy of protecting the rights and privacy of individuals. We need to collect and use certain types of Data in order to carry on our work of running Ramsbury Memorial Hall (RMH). This personal information must be collected and handled securely.

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.

Ramsbury Memorial Hall will remain the data controller for the information held. The Trustees, Committee and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees, Committee members and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

Purpose

The purpose of this policy is to set out the RMH commitment and procedures for protecting personal data. The Trustees and Committee 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 recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

The following are definitions of the terms used:

Data Controller - the Management Committee which decides what personal information RMH will hold and how it will be held or used.

Act means the Data Protection Act 1998 and General Data Protection Regulations - the legislation that requires responsible behaviour by those using personal information.

Data Protection Officer – the person responsible for ensuring that RMH follows its data protection policy and complies with the Act.

Data Subject – the individual whose personal information is being held or processed by RMH for example a donor or hirer.

'Explicit' consent – is a freely given, specific agreement by a Data Subject to the processing of personal information about her/him.

Explicit consent is needed for processing "sensitive data", which includes:

(a) Racial or ethnic origin of the data subject

(b) Political opinions

(c) Religious beliefs or other beliefs of a similar nature

(d) Trade union membership

(e) Physical or mental health or condition

(f) Sexual orientation

(g) Criminal record

(h) Proceedings for any offence committed or alleged to have been committed

Information Commissioner's Office (ICO) - the ICO is responsible for implementing and overseeing the Data Protection Act 1998.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – information about living individuals that enables them to be identified – e.g. names, addresses, telephone numbers and email addresses. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers. The Data Protection Act

This contains 8 principles for processing personal data with which we must 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. Applying the Data Protection Act within the charity

We will let people know why we are collecting their data, which is for the purpose of running RMH, including, but not limited to, its membership, bookings and finances. It is our responsibility to ensure the data is only used for this purpose. Access to personal information will be limited to Committee members and volunteers.

Correcting data

Individuals have a right to make a Subject Access Request (SAR) to find out whether RMH holds their personal data, where, what it is used for and to have data corrected if it is wrong, to prevent use which is causing them damage or distress, or to stop marketing information being sent to them. Any SAR must be dealt with within 30 days. Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill, bank or credit card statement.

Responsibilities

RMH is the Data Controller under the Act, and is legally responsible for complying with Act, which means that it determines what purposes personal information held will be used for.

The Management Committee will take into account legal requirements and ensure that it is properly implemented, and will through appropriate management, strict application of criteria and controls:

a) Collection and use information fairly.

b) Specify the purposes for which information is used.

c) Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.

d) Ensure the quality of information used.

e) Ensure the rights of people about whom information is held, can be exercised under the Act.

These include:

i) The right to be informed that processing is undertaken.
ii) The right of access to one's personal information.
iii) The right to prevent processing in certain circumstances, and
iv) The right to correct, rectify, block or erase information which is regarded as wrong information.

f) Take appropriate technical and organisational security measures to safeguard personal information,

g) Ensure that personal information is not transferred abroad without suitable safeguards,

h) Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information,

i) Set out clear procedures for responding to requests for information.

All Trustees, Committee members and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

The Data Protection Officer on the Committee is:

Name: Ian Smith

Contact Details: Telephone 07977 473975; email oldtiff@hotmail.co.uk

The Data Protection Officer will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

a) Everyone processing personal information understands that they are contractually responsible for following good data protection practice

b) Everyone processing personal information is appropriately trained to do so

c) Everyone processing personal information is appropriately supervised

d) Anybody wanting to make enquiries about handling personal information knows what to do

e) Dealing promptly and courteously with any enquiries about handling personal information

f) Describe clearly how the charity handles personal information

g) Will regularly review and audit the ways it holds, manages and uses personal information

h) Will regularly assess and evaluate its methods and performance in relation to handling personal information.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the Data Protection Officer.

Procedures for Handling Data & Data Security

RMH has a duty to ensure that appropriate technical and organisational measures and training are taken to prevent:

• Unauthorised or unlawful processing of personal data

• Unauthorised disclosure of personal data

• Accidental loss of personal data

Data Storage:

Personal data will be stored securely and will only be accessible to authorised volunteers or staff.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. For financial records this will be up to 7 years. For employee records see below. Archival material such as minutes and legal documents will be stored indefinitely. Other correspondence and emails will be disposed of when no longer required or when committee members or volunteers retire.

All personal data held for the organisation must be non-recoverable from any computer which has been passed on/sold to a third party.

Information Regarding Employees or Former Employees:

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.

Accident Book:

This will be checked regularly. Any page which has been completed will be removed, appropriate action taken and the page filed securely.

Data Subject Access Requests:

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:

a) 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. safeguarding

b) The Data Subject has already made the information public

c) Conducting any legal proceedings, obtaining legal advice or defending any legal rights

d) Monitoring for equal opportunities purposes – i.e. race, disability or religion

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.

13th November 2018