

Data Protection Policy

Tiddington Community Centre

Data Protection Policy

Name of Charity: Tiddington Community Centre

Introduction

This policy describes how the Tiddington Community Centre (also referred to as "TCC", "we" or "us") will make use of the data we handle in relation to the hiring of the TCC facilities.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website www.tiddingtoncommunitycentre.org.uk or our noticeboard regularly for any amendments (but amendments will not be made retrospectively).

We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.org.uk). For the purposes of the GDPR, the TCC will be the "data controller" of all personal data we hold about you.

Definitions

1. Personal data is information about a person which is identifiable as being about them e.g. names, addresses, telephone numbers and email addresses. It can be stored electronically or on paper, and includes images and audio recordings as well as written information. It does not apply to information about organisations, companies and agencies but applies to named persons.
2. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

Responsibility

- Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.
- All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the TCC.

This includes:

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- Dealing promptly and courteously with any enquiries about handling personal information
- Describe clearly how the charity handles personal information
- Regularly reviewing and auditing the ways it holds, manages and uses personal information
- Regularly assessing and evaluating its methods and performance in relation to handling personal information.

Overall policy statement

1. The TCC needs to keep personal data about its committee, centre hirers, volunteers and supporters in order to carry out TCC activities.
2. We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the UK General Data Protection Regulation (GDPR) and other relevant legislation.
3. We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.
4. We will only collect, store and use data for:
 - purposes for which the individual has given explicit consent, or
 - purposes that are in our our legitimate interests, or

- contracts with the individual whose data it is, or
 - to comply with legal obligations, or
 - to protect someone's life, or
 - to perform public tasks.
5. We will provide individuals with details of the data we have about them when requested by the relevant individual.
 6. We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.
 7. We will endeavour to keep personal data up-to-date and accurate.
 8. We will store personal data securely.
 9. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
 10. We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
 11. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
 12. To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

What information do we collect?

We collect and process personal data from you when you request details regarding and/or hire facilities at the Community Centre and when you agree to receiving marketing and information emails. This includes:

- your name
- your gender,
- your date of birth,
- your home address, email address and phone number;
- your marketing preferences, including any consents you have given us;

How do we collect information?

The TCC uses a third-party system from 'Hallmaster' to handle bookings. Hallmaster store and process the information to enable the TCC to conduct their business.

In this context, TCC is the 'Data Controller' and 'Hallmaster' are 'Data Processors'.

Hallmaster's privacy policy can be found here <https://www.hallmaster.co.uk/Docs/Hallmaster-Privacy-Policy.pdf>

The TCC may also obtain information directly from users and supporters of the hall.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

1. As required by the TCC to conduct our business and pursue our legitimate interests, in particular:
 - we will use your information to manage and administer the hiring of facilities at the TCC, and to keep in contact with you for these purposes;
 - CCTV cameras may be used to maintain the security of our premises and we may use this video to investigate incidents on or around the premises.
2. For purposes which are required by law:
 - we may respond to requests by government or law enforcement authorities conducting an investigation.

What rights do I have?

Individuals have a right to make a Subject Access Request (SAR)

- (a) to request a copy of your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances

(e) to object to or restrict how your personal data is processed

These **rights may be limited**, for example, if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. 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.

If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office, as detailed below;

<https://ico.org.uk/concerns/>
0303 123 1113

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5A

How do I get in touch with you?

We hope that we can satisfy any queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch at;

XXXX

Review

This policy will be reviewed every two years

Date

Signature (Chair)

Signature (Secretary)

Data protection procedures

1. Introduction

The TCC 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

The TCC must therefore ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether or not the information is held on paper, in a computer or recorded by some other means e.g. tablet or mobile phone.

Personal data relates to data of living individuals who can be identified from that data and use of that data could cause an individual damage or distress. This does not mean that mentioning someone's name in a document comprises personal data; however, combining various data elements such as a person's name and salary or religious beliefs etc. would be classed as personal data, and falls within the scope of the DPA.

It is therefore important that all management committee members and volunteers consider any information (which is not otherwise in the public domain) that can be used to identify an individual as personal data and observe the guidance given below.

1. The TCC has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.
2. These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

2. General procedures

1. 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. Archival material such as minutes and legal documents will be stored indefinitely. Other correspondence and emails will be disposed of when no longer required.
2. Only the TCC will have access to personal information 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.
3. Consent to retain personal information will be recorded and updated as necessary.
4. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
5. We will keep records of consent given for us to collect, use and store data. These records will be stored securely.
6. The general risk assessment for the management and operation of the TCC will make specific reference to data security.
7. Data security will be included as a regular agenda item at TCC Committee meetings.
8. Information to meet a SAR (subject access request) request will only be released if evidence of identity is provided.
9. Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third-party website (e.g. Google Drive) we will ensure the third party comply with the UK GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.
10. All personal data held for the organisation must be non-recoverable from any computer which has been passed on/sold to a third party.
11. Computers and devices used to access and process the data will have up to date internet security software installed and operational. Laptops and portable devices that hold data containing personal information will be protected with a suitable encryption program (password). Laptops will be kept locked (password protected) when left unattended, even for short periods of time. When travelling in a car, laptops will be out of sight, preferably in the boot. Laptops or portable devices will not be left in vehicles overnight. Laptops or portable devices will not be left unattended in restaurants or bars, or any other venue.

When travelling on public transport, laptops or portable devices will be kept with the owner at all times, will not be left in luggage racks.

12. All passwords should contain both upper and lower-case letters and preferably contain some numbers and should not be easy to guess. Ideally passwords should be 6 characters or more in length. Passwords will not be given out to anyone, will not be written on the device and will not be written on anything stored in the laptop case.
13. All committee members and volunteers will consider whether an email (both incoming and outgoing) will need to be kept as an official record. Emails containing personal information will be saved into appropriate secure folders and deleted from email in-boxes and deleted files folders.
14. 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. If there are any doubts, the caller will be asked to put their enquiry in writing.
15. The hall accident book records will be checked regularly. Any page which has been completed will be removed from the book and stored securely.

3. Mailing list

1. We will maintain a mailing list. This will include the names and contact details of people who wish to receive, publicity and fundraising appeals from the TCC.
2. When people sign up to the list we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give separate consent to receive publicity and fundraising messages, and will only send them messages which they have expressly consented to receive.
3. We will not use the mailing list in any way that the individuals on it have not explicitly consented to.
4. We will provide information about how to be removed from the list with every mailing.
5. We will use mailing list providers who store data within the EU.

4. Contacting volunteers

1. Local people volunteer for the TCC in a number of ways.

2. We will maintain a list of contact details of our recent volunteers. We will share volunteering opportunities and requests for help with the people on this list.
3. People will be removed from the list if they have not volunteered for the TCC for 12 months.
4. When contacting people on this list, we will provide a privacy notice which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.
5. To allow volunteers to work together to organise for the TCC, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

5. Contacting committee members

1. The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
2. Committee contact details will be shared among the committee.
3. Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than TCC business, without explicit consent.

6. Review

These procedures will be reviewed every two years

Date

Signature (Chair)

Signature (Secretary)