

Tirril and Sockbridge Reading Room and Library

(Aka Tirril and Sockbridge Village Hall)

Data Protection Policy and Privacy Notice (v3.4)

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 managing Tirril and Sockbridge Reading Room and Library (subsequently referred to in this document as the Village Hall). 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 include email, minutes of meeting and photographs.

The Charity will remain the **Data Controller** for the information held. The Trustees, staff and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees, staff and volunteers who have access to personal information will therefore be expected to read and comply with the Policy.

Purpose and Definitions

The purpose of the policy is to set out the Village Hall's commitment and procedure for protecting personal data. Trustees 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 definitions of the terms used are:

Data Controller The Trustees, who collectively decide what personal information the Charity will hold and how it will be held and used.

Act means the DPA 1998 and GDPR.

Data Protection Officer The Village Hall is not required to appoint an individual DPO.

Data Subject the individual whose personal information is being held or processed by the Village Hall (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 themselves.

Explicit consent is needed for processing sensitive data which includes:

- racial or ethnic origin; political opinions; religious or other beliefs; trade union membership; physical or mental health; sexual orientation; criminal record; proceedings for any alleged or committed offence.

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

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

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

Personal Data shall be:

1. processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
2. obtained only for one or more purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes.
3. adequate, relevant and not excessive to those purposes.
4. accurate and, where necessary, kept up to date.
5. not kept for longer than is necessary.
6. processed in accordance with the rights of data subjects under the act.
7. kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing, accidental loss, destruction of, or damage to personal information.
8. not 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 DPA within the Charity.

Collection and Security of Personal Data

We will let people know why we are collecting their data, which is for the purpose of managing the Village Hall, it's hiring and finances. It is our responsibility to ensure the data is used for this purpose only. Access to personal information will be limited to trustees, staff and volunteers and will not be passed on without the prior written consent of the individual involved.

Correcting Data individuals have a right to make a Subject Access Request SAR to find out whether the charity holds personal data, where, and what it is used for and to have data corrected if it is wrong; to prevent use which may cause damage or distress and to stop marketing information being sent to them. Any SAR to be dealt with within 30 days. The identity of the individual will be confirmed before providing any information to them, by means of photo identification (eg passport), confirmation of address (eg utility bill).

Responsibility The Charity is the Data Controller under the Act and is legally responsible for compliance and will determine for what purposes personal information is held.

The Management Committee will take into account legal requirements and ensure that it is properly implemented in line with the 8 principles noted above.

Examples of Personal data held by the Data Controller are: personal details of Trustees, employees and volunteers including contact details; financial records required for accounting and audit purposes; personal details relating to raffles and competitions; details of individuals who hire the hall or use its facilities; individual donors; processing of gift aid claims; etc.

Personal Data Communication Policy

An up to date record is to be kept of all **Trustees** including name, address, telephone number, email address, officer's role (if any) and date of appointment as required by the Charities Commission. This is updated by the Secretary and kept securely on an electronic file and also a manual file kept in the locked filing cabinet in the hall.

Similar information is sometimes held for **Volunteers** who help with events and activities and is shared with Trustees on an as needs basis. This information is shared by the Trustees for communication purposes when organising meetings, events etc. The list of Trustees will be updated as necessary by the Secretary and kept securely as part of the Village Hall archive.

Entries into raffles, competitions etc. Names, addresses and telephone numbers of individuals may be collected on raffle tickets and in association with other competitions, for the sole purpose of contacting the winners. This information will be kept securely and be destroyed within 48 hours of the end of the event.

Personal finance data the Data Controller may hold information about individuals who have made donations or payments to the Village Hall. The data is held securely by the Treasurer for the purpose of providing an audit trail. Names of individual donors must not be made public without the specific consent of the individual.

Information regarding cheque payments are securely retained by the Treasurer in case of queries regarding payment and for financial records.

Gift Aid - personal data is retained and used in relation to HMRC's requirements for the production of Gift Aid claims. Gift aid forms completed by individuals will be securely retained in hard copy by the Treasurer in line with HMRC requirements.

Employees - information regarding employees is securely retained for a period of 5 years in line with HMRC requirements.

Personal finance data may be made available to Trustees as appropriate and to the independent examiner of accounts for audit purposes.

Hirers of the Hall - personal data of hirers of the Village Hall facilities will complete a Hirers Agreement form which includes reference to this Data Protection Policy. The policy is available to view on request and a copy is kept in the Hirers Information folder in the Village Hall. The form is to be securely retained by the Bookings Officers and data necessary for invoicing can be passed on to the Treasurer and incorporated into the financial records. Booking forms will be retained as long as necessary in case future issues arise from the use of the Village Hall, eg for insurance purposes. The Hiring Agreements will then be destroyed at the discretion of the Bookings Officers.

Availability of Policy: This Policy will be made available on request. Also a copy will be kept in the Hirers Information folder located in the kitchen of the Village Hall.

Privacy Notice: The Village Hall uses personal data for the purpose of managing the hall, bookings and finances, marketing events, staff/volunteers employment and fundraising activities. Data may be retained for up to 7 years for accounts purposes and for longer where required by the hall's insurers. If you would like to find out more about how we use your personal data or want to see a copy of the information about you that we hold, please contact the Bookings Officer or Secretary.

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

December 2023

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Data Protection Procedures for Handling

Charity Number 523082

Personal Data and Data Security

To prevent - Unauthorised or unlawful processing of personal data
- Unauthorised disclosure of personal data
- Accidental loss of personal data

All Trustees, staff and volunteers (subsequently referred to as the responsible person), must ensure personal data is dealt with properly no matter how it is collected, recorded or used.

Email: the responsible person will consider whether an email, incoming or outgoing, will need to be kept as an official record. If it needs to be retained it should be saved into an appropriate folder or printed and stored securely. Emails that contain personal information and no longer required for operational purposes should be deleted.

Phone calls: can lead to unauthorised use or disclosure of information and the following precautions should be taken:

- Personal information should not be given out over the telephone unless you have no doubts as to the caller's identity and the information requested is innocuous.
- If you have any doubts ask the caller to put their enquiry into writing.
- If you receive a phone call asking for personal information to be checked or confirmed be aware that the call may come from someone impersonating a person with a right of action.

Laptops, Portable Devices and Manual Files: that hold data containing personal information relating to the Village Hall must be kept secure at all times and not left unattended in a vehicle or public place.

Data Security Storage: as little personal data as possible to be stored, only essential files to be retained. All computer equipment used for personal data processing must be password protected with a strong password.

Data Storage: Personal data will be stored securely and will only be accessible to authorised Trustees, staff or volunteers.

- Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

- Archival material such as Minutes and Legal documents will be stored indefinitely. Manual files will be kept in the locked filing cabinet in the Village Hall or may be stored in the County Archives at Kendal as decided by the Management Committee.
- The Village Hall Accident Book will be checked regularly (at least monthly) by a nominated Trustee. If a page has been completed it must be removed, actioned and stored securely in the filing cabinet.
- Permission must be obtained by the Trustees from anyone who has their photograph taken at a Village Hall event before they are published in any form, either electronic or manual.

December 2023