# STOWUPLAND VILLAGE HALL – Data Protection Policy (May 2018)

#### **INTRODUCTION**

Stowupland Village Hall is a registered charity (No 304822) and is responsible for the village hall premises and adjoining land used by the local bowls, cricket and football clubs. Part of the premises is occupied by the Stowupland Sports and Social Club. All the clubs are separately managed.

The charity is administered by a Trustees Management Committee. We need to collect and use certain types of data relating to our trustees, employees and service users in order to carry out the day-to-day management of the Village Hall and to comply with legal obligations.

#### **OUR DATA PROTECTION POLICY**

We are committed to ensuring that any personal data that is shared with us will be dealt with in line with the General Data Protection Regulations which came into force on 25 May 2018. These build on and supersede the Data Protection Act 1998.

The aims of this policy are to:

- ensure that everyone handling personal data within the charity is aware of the legal requirements;
- set out our data collection and processing practices;
- provide information about how individuals can check what data is held on them; and
- demonstrate compliance with the regulations.

We will ensure that the personal data we collect and hold will be:

- processed lawfully, fairly and in a transparent manner;
- collected only for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which the data is collected and used;
- accurate and, where necessary, kept up to date. We will take every reasonable step to erase or rectify any personal data that is inaccurate as soon as possible;
- kept for no longer than is absolutely necessary; and
- held in such a way that protects against unauthorised or unlawful use, accidental loss, destruction or damage.

By 'processing' we mean obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes paper based personal data as well as that kept electronically.

# **COMPLIANCE WITH THE DATA PROTECTION REGULATIONS**

The charity is the data controller for the information held and below we set out how we intend to comply with the Data Protection Regulations.

### We obtain information in the following ways:

• by consent in the case of the trustees and employees in order to facilitate communication within the Management Committee;

- as a legal requirement, for instance to meet the needs of the Charity Commission and HM Revenue and Customs;
- through the occupational licences issued to the various sports and social clubs who make use of our facilities; and
- as part of the contractual requirements in hiring out the village hall and associated services.

#### What information do we collect?

Mainly, we collect, store and use name and contact details, including postal and e-mail addresses, and telephone numbers. Other information may be requested where appropriate to meet specific requirements e.g. dates of birth of trustees as required by the Charity Commission; PAYE data relating to our employees to meet the requirements of HM Revenue and Customs; and the purpose of a hire and related activities in order to ensure the correct rate is charged for a hire and it complies with the Village Hall premises licence.

### How and why will we use your personal data?

Personal data provided to us will only be used to:

- provide hirers with the services requested and to collect payment from them;
- comply with charity and employment law; and
- facilitate the day-to-day management of the Village Hall.

#### Children's data

We require that individuals hiring the hall are 21 years of age and over. Therefore, we do not knowingly process data of any person under the age of 16. If we discover or believe that we are holding information relating to anyone aged 15 or under we will delete it and withhold services accordingly.

### Who do we share your personal information with?

Most of the personal information we hold relates to the hire of the Village Hall and will be held within the organisation. A monthly list of bookings (names only) is shared with the Football Club to facilitate car parking arrangements at the Village Hall.

Some information about the trustees and employees will be shared with the Charity Commission and HMRC respectively to meet legal requirements.

#### How long do we hold your information for?

Information relating to hall bookings is kept as part of accounting processes and, along with other financial records, is kept for at least six years in line with Government guidance.

Information provided to the Charity Commission is amended immediately there are changes to the trustees. Other personal information is removed from our records six years after the date it was collected unless it is still required for the purposes it was collected. Trustees and employees names are recorded in the minutes of Management Committee meetings - the originals of these are archived with the Suffolk Record Office and kept in perpetuity.

## Security of and access to your personal data

We endeavour to ensure there are appropriate and proportionate technical and organisational measures in place to prevent the loss, destruction, misuse, alteration, or unauthorised disclosure or access to your personal information however it is held.

Should a data breach occur, we will review our security practices. The unauthorised disclosure of data is a criminal offence and would result in the automatic disqualification of a trustee (see Charities Act). Employees so doing would be subject to the Charity's disciplinary procedures.

### Your rights

Where we rely on your consent to use your personal information, you have the right to withdraw your consent at any time. You also have the right to:

- be informed of how your personal information will be used. This policy is intended to clarify this;
- ask us what information we hold on you and to request a copy of that information. We have to respond in 30 days, provided we are satisfied you are entitled to see the information requested and we have confirmed your identity;
- ask us to update or delete your personal information from our records;
- restrict the processing of your personal data if there is a disagreement about its accuracy or legitimate usage;
- ask us to provide you with your information in a machine-readable format.

To exercise these rights, please send us a description of the personal information in question using the contact details below.

More detailed information about your rights is available from the Information Commissioner's Office (ICO) at www.ico.org.uk

## **Policy review**

We keep this policy under regular review, in particular taking account of changes in data protection law. Updated versions will be posted on our website at <a href="https://www.stowupland.com/village-hall">www.stowupland.com/village-hall</a>

# **Publicising the policy**

A privacy notice will be included on the Village Hall booking form and our website to explain in a clear and concise way the purpose of data collection, how long we intend to keep data, the legal basis of processing and the data subject's rights. Our data protection policy will also be made available on our website.

## **Further information**

If you have any questions or wish to check the personal information we hold on you please contact by contacting the Chair of the Village Hall Management Committee – <u>J craine@sky.com</u>

May 2018