



Claygate Village Hall Association

Registered Charity No: 305007

Data Protection Policy

Introduction

The Claygate Village Hall Association (CVHA) is 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 Claygate Village Hall. This personal data must be collected and handled securely. The Data Protection Act 2018 (DPA) and General Data Protection Regulations (GDPR) govern the use of data about people. Personal data can be held on paper, computers and mobile devices

Purpose

The purpose of this policy is to set out the CVHA's commitment to, and procedures for protecting personal data. Trustees and Officers will endeavour to ensure that this policy is adhered to.

Scope

This policy applies to all Trustees and Officers who belong to the Claygate Village Hall Association and to data belonging to any donor, hirer or other individual interacting with them in their respective roles as Trustee or Officer.

Definitions

Personal Data – data (or information) about living individuals that enables them to be identified; a name alone is not classed as personal data, It does not apply to information about organisations, companies and agencies.

Data Controller - the CVHA Trustees who collectively decide what personal data CVHA will hold and how it will be held or used.

Data Protection Officer (DPO) – the person responsible for ensuring that CVHA follows its data protection policy and complies with the DPA. In our case the Management Committee will act collectively in this role.

Data Processor - Hallmaster (see <https://www.hallmaster.co.uk>) the organisation responsible for supplying an on-line booking system

Management Committee – a sub-committee appointed by the Trustee Board annually at the AGM comprising Chair, Vice-Chair, Secretary, Treasurer, Lettings Manager and Hall Manager. This subcommittee is collectively responsible for the day to day running of the hall on behalf of the Trustees.

Data Subject – the individual whose personal data is being held or processed by CVHA for example a donor, hirer, Trustee or Officer

'Explicit' consent – is a freely given, specific agreement by a Data Subject to the processing of personal information about her/him. It is needed for processing "sensitive personal data" as set out in GDPR. The Data subject agrees to this by signing the booking form.

Processing – means collecting, amending, handling, storing or disclosing personal data

Responsibilities

The CVHA Trustees as Data Controller are legally responsible for complying with the DPA and GDPR and determining what purposes personal information held will be used for.

Hallmaster, a leading supplier of hall booking systems as our Data Processor, shares these responsibilities

The Management Committee ensures that this Data Protection Policy is adhered to by implementing the following and it will:

- a) Specify the purposes for which information is used.
- b) Ensure that the rights of people, whose information is held, can be exercised under the DPA and GDPR.
- c) Take appropriate technical and organisational security measures to safeguard personal information.
- d) Ensure there is no discrimination when dealing with requests for information.
- e) Set out clear procedures for responding to requests for information.

Privacy Notice

The CVHA Privacy Notice is a separate document available on the website under About > Supporting Documents. It represents a legal requirement and will be maintained in step with this policy.

Data Security and Storage

As little personal data as possible will be stored on paper, computer and mobile devices. This data will be protected by a suitable encryption program and access controls (password).

Where data is held by our data processor, Hallmaster, their privacy policy will apply. This means that if a hirer uses Hallmaster for another venue we will only be able to remove data about bookings with us, and not relating to their account with Hallmaster. This data can only be removed by Hallmaster

Computers and mobile devices will be protected with up-to-date anti-virus software and be locked (password protected) when left unattended, especially in a public space, even for short periods of time.

Outside home, portable devices will either be kept out of sight or in personal possession.

Portable devices that contain personal data will not be kept in a vehicle overnight.

Information will be stored for only as long as it is needed or required as described in the CVHA Records Management Policy.

All personal data held on a desktop or portable device which is passed on or sold will be non-recoverable.

Data Subject Access Requests

We may occasionally need to share data with other agencies.-The circumstances where the law allows the charity to disclose data (including personal sensitive data) without the data subject's consent are:

- a) Carrying out a legal duty
- b) Conducting any legal proceedings, obtaining legal advice or defending any legal rights

We regard the lawful and correct treatment of personal data as very important to successful working-with those whom we deal and maintaining their confidence.

Any queries relating to this policy should be directed to the Management Committee by email using enquiries@claygatevillagehall.co.uk.

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, where it is held, 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.

Review

This policy will be reviewed every 3 years or when new legislation requires it to be updated.