



Data Protection

Data Protection Policy

The Trustees and Management Committee¹ 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 on managing Upper Rissington Village Hall².

The General Data Protection Regulations (GDPR) govern the use of information about people known as **Personal Data** which shall be collected and handled securely. **Personal Data** may be held on laptops, computers and mobile devices or in a manual file and includes e-mails, minutes of meetings and photographs.

The URVH Secretary is the Data Controller for the information held. The Trustees and Committee are personally responsible for holding and using personal information in accordance with the DPA and the GDPR.

Trustees and the Committee shall comply with this policy.

David Oliver

Chairman of URVH Management Committee

January 2019

¹ Hereinafter referred to as "the Committee"

² Hereinafter referred to as "URVH"

Data Protection Arrangements

1 INTRODUCTION

1.1 The Committee regards the lawful and correct treatment of **Personal Data** as very important to successful working and to maintain the confidence of those with whom we deal with. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

1.2 The following are definitions of the terms used:

- (i) **Data Controller** – the URVH Secretary is the person who decides what personal data URVH will hold, who will hold it and how it will be held or used.
- (ii) **Act** means the GDPR – the legislation that requires responsible behaviour by those using personal information.
- (iii) **Data Subject** means the individual whose personal information is being held or processed by URVH for the purposes of managing the Village Hall.
- (iv) **Processing** means collecting, amending, handling, storing or disclosing personal information.
- (v) **Personal Data** means information about living individuals that enables them to be identified and shall include:
 - Online identifiers (emails)
 - Trustee, Committee and employee information
 - Databases holding contact information (bookings, mailings)
 - CCTV footage
 - Financial information
 - Publicity information
 - Fundraising purposes (individual donors)

The **Personal Data** Map for URVH is shown in Appendix 1

2 RESPONSIBILITIES

2.1 The Management Committee will take into account the Act, ensure they are properly implemented and will through the URVH management system and specifically this procedure, apply strict controls.

2.2 The URVH Secretary, as Data Controller, shall be responsible for ensuring that the procedure is implemented and will have overall responsibility for:

- (i) Ensuring the Trustees and Committee implement this procedure
- (ii) Dealing promptly and courteously with SAR's and similar enquires
- (ii) managing any breach of the DPA in compliance with this procedure

3. COLLECTING PERSONAL DATA

3.1 We will let people know why we are collecting their **Personal Data** and this shall be exclusively for managing the Village Hall, its activities and its finances and is integral to the operation of the Hallmaster booking system.

3.2 It is the responsibility of the Trustees and the Committee to ensure that data is only used for these purposes.

3.3 Access to Personal Data shall be limited to the Trustees and Committee.

- 3.4 The following statement shall be visible on the URVH website, in URVH procedures where applicable and in the Hallmaster booking system:

Upper Rissington Village Hall collects and uses Personal Data for the purposes of managing the Hall, its bookings and finances, running and marketing events at the Hall. This data will only be used in connection with the purpose for which it was collected and will be retained as required by the Trustees. If you would like to find out more about how we use your Personal Data or want to see a copy of information about what we hold, please contact the URVH Secretary.

4 USE AND STORAGE OF PERSONAL DATA

- 4.1 It shall be processed fairly and lawfully and in compliance with URVH established procedures
- 4.2 It shall be obtained only for the reasons stated in the procedures and shall not be processed in any manner incompatible with those purposes
- 4.3 It shall be adequate, relevant and not excessive in relation to those purposes
- 4.4 It shall be accurate and, where necessary, kept up to date
- 4.5 It shall not be kept for longer than necessary; retention period being shown in Appendix 1
- 4.6 It shall be processed in accordance with the rights of data subjects under the Act
- 4.7 It shall be kept secure by those appointed with responsibilities in the URVH management system (see Appendix 1) who shall take appropriate technical or other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of **Personal Data**.
- (i) All laptops and portable devices that hold Personal Data shall be protected by password
 - (ii) Personal data shall not be stored on memory sticks
 - (iii) The URVH office filing cabinet shall be kept locked at all times
 - (iv) URVH shall operate a "clear desk policy" including the stowage of the Caretaker Log
 - (v) Hard copy records kept at home by Trustees or Committee members shall be maintained secure
 - (vi) Access to the URVH Google Drive shall be strictly controlled by the Secretary
 - (vii) Emails shall be saved in the appropriate folders and when printed, stored securely
 - (viii) No personal information shall be given out over the telephone unless the person's identity is confirmed and the request is valid.
 - (ix) Completed pages from the Accident Book shall be removed and when appropriate action taken, stored securely

5 CORRECTING PERSONAL DATA

- 5.1 Individuals have a right to make a Subject Access Request (SAR) to find out whether URVH holds their **Personal Data**, where it is, what it is used for and to have the data corrected if it is wrong. They also have the right to prevent its use if it is causing them damage or distress or to stop marketing information being set to them.

- 5.2 All SARs shall be dealt with within 30 days. Steps shall first be taken to confirm the identity of the individual making the request before providing information. This will require:
- (i) photo identity (passport etc)
 - (ii) confirmation of address (utility bill, etc)
- Failure to produce this evidence shall nullify the SAR.

6 BREACHING THE DPA

- 6.1 We are required to report certain types of **Personal Data** breach to the Information Commissioners Office (ICO) and in some cases to the individuals affected.
- 6.2 A **Personal Data** breach is a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data. The ICO shall be notified where it is likely to result in injury to an individual. The report shall be made within 72 hours of becoming aware that an incident is reportable. Where there is doubt as to whether the breach is reportable, clarification shall be obtained from the ICO helpline on 0303 123 1113.
- 6.3 All breach of the DPA, reportable or not, shall be investigated to prevent recurrence.

The following Trustees and Members of the Management Committee sign that they have read the Data Protection Procedure (urvh 14), understand it and will abide by its requirements:

NAME	SIGN
Dean Beard	
Zoe Branch	
Wayne Fisher	
David Harrison	
Richard Knight	
David Oliver	
Andrew Mitchell	

Signed copy of this document held by the URVH Secretary

Upper Rissington Village Hall



UPPER RISSINGTON VILLAGE HALL PERSONAL DATA MAP

May 2018

REPOSITORY	PERSONAL DATA HELD	RETENTION PERIOD	ACCESS	SECURITY
URVH Google Drive "Trust"	20.3 Register	25	Chairman of the Trust	Google Drive managed by the URVH Secretary. "Read" access granted to all. "Write" access allocated on <i>need</i> basis.
	Accounts	7	Treasurer	
	Annual Report	7	Secretary	
	Lease and associated documents	25	Trustees	
	Minutes of all Meetings	25		
URVH Google Drive "Management"	Business Plan	25	Chairman of MC	Google Drive managed by the URVH Secretary. "Read" access granted to all. "Write" access allocated on <i>need</i> basis.
	Maintenance Contracts	25	Treasurer	
	Employee Contracts	Indefinitely	Secretary	
	Financial Information	7	Committee Members	
	Keyholder Rota	7	Trustees	
	Management System	25		
	Minutes of all Meetings	25		
	Photographs	25		
	Safety Check Records	7		
	URVH Memos - Internal	7		
	URVH Memos - Parish Council	7		
	VHMC Directory	3		
Trust Chairman laptop and portable devices	Relevant e-mails	Data held during the period of appointment. On resignation data is deleted.	Trust Chairman	Password
MC Chairman laptop and portable devices	Relevant e-mails	Data held during the period of appointment. On resignation data is deleted.	MC Chairman	Password
Trust and MC Treasurer laptop and portable devices	Business Plan	Data held during the period of appointment. On resignation data is deleted.	Treasurer	Password
	Maintenance Contracts			
	Employee Contracts			
	Financial Information			
	Relevant e-mails			

Trust and MC Secretary laptop and portable devices	Business Plan	Data held during the period of appointment. On resignation data is deleted.	Secretary	Password
	Keyholder Rota			
	Management System			
	Minutes of all Meetings			
	URVH Memos - Internal			
	URVH Memos - Parish Council			
	VHMC Directory			
Relevant e-mails				
Hall Manager laptop and portable devices	HallMaster Booking system	Data held during the period of appointment. On resignation data is deleted.	Hall Manager	Password
	Keyholder Rota			
	VHMC Directory			
	Safety Check records			
	Relevant e-mails			
Trustees and MC personal laptops & portable devices	Relevant e-mails	Data held during the period of appointment. On resignation data is deleted.	Laptop owner	Password