

Fringford Village Hall Privacy Policy

Introduction

Fringford Village Hall Committee (FVHC), is governed by the Charities Commission (charity number 1077028) and as Trustees respect your privacy and recognise how important it is to you that your personal information remains secure. The FVHC needs to collect and use certain types of data in order to manage the village hall. All personal information must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General 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 includes emails and minutes of meetings.

The FVHC Trustees are the Data Controllers for the information held and are responsible for processing and using personal information in accordance with the Data Protection Act and General Protection Regulations.

Trustees, staff and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

Purpose

The purpose of this policy is to set out the FVHC's commitment and procedures 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 with. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

The following are definitions of the terms used:

Data Controller – the trustees who collectively decide what personal information Fringford Village Hall will hold and how it will be held or used.

Act means the Data Protection Act 1998 and General Data Protection Regulations – the legislation that requires responsible behaviour by those using personal information.

Data Protection Officer – the person responsible for ensuring that Fringford Village Hall follows its data protection policy and complies with the Act. (Fringford Village Hall is not required to appoint a DPO.)

Data Subject - the individual whose personal information is being held or processed by Fringford 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 her/him.

Explicit consent is needed for processing "sensitive data", which includes:

- a) Racial or ethnic origin of the data subject
- b) Political opinions
- c) Religious beliefs or other beliefs of a similar nature
- d) Trade union membership
- e) Physical or mental health or condition
- f) Sexual orientation
- g) Criminal record
- h) Proceedings for any offence committed or alleged to have been committed

Fringford Village Hall Privacy Policy

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

Processing – means collecting, amending, handling, storing or disclosing personal information.

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

The Data Protection Act

This contains 8 principles for processing personal data with which we must comply.

Personal Data

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

The FVHC collect data for the purpose of managing the village hall, bookings, events and finances including fundraising.

To keep you informed of our services and other activities we process and retain your contact information. This is usually limited to name, telephone number, address and email address. If you are a hirer of Fringford Village Hall, we may also need to hold data about you for invoicing purposes as part of your hirer agreement.

If you choose to correspond with us via email, we may retain the content of your email messages together with your email address and our responses. We protect these electronic communications in the same way as information received by mail and telephone. We will not share or sell your information to third party organisations.

Correcting data

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, where, 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, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill, bank or credit card statement.

Responsibilities

The FVHC is the Data Controller under the Act, and is legally responsible for complying with the Act, which means that it determines what purposes personal information held will be used for.

The FVHC will take into account legal requirements and ensure that it is properly implemented, and will through appropriate management, strict application of criteria and controls:

- a) Collection and use information fairly.
- b) Specify the purposes for which information is used.
- c) Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.
- d) Ensure the quality of information used.
- e) Ensure the rights of people about whom information is held, can be exercised under the Act.

These include:

- The right to be informed that processing is undertaken.
 - The right of access to one's personal information.
 - The right to prevent processing in certain circumstances, and
 - The right to correct, rectify, block or erase information which is regarded as wrong information.
- f) Take appropriate technical and organisational security measures to safeguard personal information,
 - g) Ensure that personal information is not transferred abroad without suitable safeguards,
 - h) Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information,
 - i) Set out clear procedures for responding to requests for information.

All trustees, staff and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

Procedures for Handling Data & Data Security

FVHC 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

All trustees, staff and volunteers 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.

Fringford Village Hall Privacy Policy

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 staff 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.

CCTV

Use of CCTV is covered both by Data Protection legislation and by the Protection of Freedom Act (POFA) and the Human Rights Act 1998 and particular care is therefore required in the use, recording, storage and access to recorded material. A separate CCTV policy and procedures document has been produced. This is to ensure that the rights of individuals recorded by surveillance systems are protected and that the information can be used effectively for its intended purpose.

Storing your Data

Hard copies of personal data will be held securely. All electronic personal data held on computers or portable devices (for example laptops, USB drives) will be password protected. The Fringford Village Hall accident book records will be removed from the book and stored securely.

Disposal of Data

We will retain your information for as long as you have an active relationship with the Fringford Village Hall. Once this relationship ceases or you request to receive no further contact, we will ensure your information is confidentially destroyed.

Privacy Notice

We will provide details of where to view our privacy notice on booking forms, conditions of hire, user handbooks and website as appropriate.

Contact Details

Any queries relating to the Fringford Village Hall please email fringford.hall@gmail.com.