



Broadwas Village Hall

Data Protection Policy – April 2023

1. Personal Data held

Chairman	• Home pc - names, email addresses and telephone numbers for trustees, volunteers and staff. • Dates of birth of trustees, names, email addresses, telephone numbers and addresses for trustees • Correspondence with hirers and other local people. • Diary - names and telephone numbers. • Mobile – names and telephone numbers. • Paper files - records from hall Accident Book. • Correspondence with insurers and contractors. • Hall archives.
Treasurer, or those authorised to make financial payments	• Recent financial records and correspondence with companies relating to financial actions. • Dates of birth of trustees, names, email addresses, telephone numbers and addresses for trustees
Trustees	• Names, email addresses and telephone numbers for trustees, volunteers and contractor.
Village Hall Admin	• Names, telephone numbers, email addresses, addresses of hirers and enquirers. • Mobile – names and numbers for trustees and regular hirers.
Volunteers	• Trustee names, numbers, email addresses

2. What Data we collect and why

<u>Type of Information</u>	<u>Purpose</u>	<u>Legal Basis for Processing</u>
Trustees' and Committee Members' title, name, address, telephone number(s), email address(es), date of birth, start and end date of service.	Overall management of Broadwas Village Hall as a charity.	For the purpose of Broadwas Village Hall's legitimate interests in the continued operation of the Hall.
Contractor's title, name, address, telephone number(s), email address(es), bank details, contracts.	Routine management of Broadwas Village Hall and enabling payment of invoices.	For the performance of contracts between Broadwas Village Hall and its contractors.
Hirers' title, name(s), address(es), telephone number(s), email address(es), financial transactions.	Overall management and booking of Broadwas Village Hall. Including maintaining Broadwas Village Hall's finances and receiving	For the performance of or for entering into contracts between hirers and Broadwas Village Hall.



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	payments for the hiring of the Hall.	For the purpose of Broadwas Village Hall's legitimate interests in the continued operation of the Hall.
Donors' and Supporters' title, name, address, telephone number(s), email address(es), bank details (all if voluntarily given).	For recording charitable income and enabling communication with donors.	For the legal obligation of maintaining Broadwas Village Hall's financial records and charitable status. For the purpose of Broadwas Village Hall's legitimate interests of enabling events to be managed and maintaining contact with supporters of the charity.
Articles for publication, photographs and videos of Committee Members, Donors, Supporters and regular Hirers.	For use in Broadwas Village Hall's publicity and promotional material through various print and digital media.	The data subject's granted consent. The data subject's consent will be sought at as early an opportunity as possible. The data subject may withdraw their consent at any time by contacting us by e-mail or letter.
Supporters, Hall Users, and Hirer's email addresses.	For use in distributing Broadwas Village Hall's publicity and promotional material.	The Support's, Hall Users, and Hirer's granted consent through the terms and conditions or by voluntarily providing their email address to join the mailing list. Consent may be withdrawn at any time by contacting us by e-mail.

3. The Data Protection Principles

The Act contains 8 principles for processing personal data with which we must comply:

- A. Personal data shall be processed fairly and lawfully and in a transparent manner.
- B. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- C. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- D. Personal data shall be accurate and, where necessary, kept up to date.



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- E. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- F. Personal data shall be processed in accordance with the rights of data subjects under UK Legislation.
- G. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- H. Personal data 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 data

4. Data Protection Policy and Procedures

We are committed to a policy of protecting the rights and privacy of individuals. We need to collect and use certain types of Personal Data (PD) in order to carry on our work of managing Broadwas Village Hall (BVH). 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 includes email, minutes of meetings, and photographs.

The charity will remain the data controller for the information held. The trustees, agents, and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees, agents, and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

4.1 Purpose

The purpose of this policy is to set out the BVH 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:

Act	means the Data Protection Act 1998 and General Data Protection Regulations - the legislation that requires responsible behaviour by those using personal information.
Data Controller	means the trustees who collectively decide what personal information BVH will hold and how it will be held or used.
Data Subject	means the individual whose personal information is being held or



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	processed by [AVH] 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: i. Racial or ethnic origin of the data subject ii. Political opinions iii. Religious beliefs or other beliefs of a similar nature (iv. Trade union membership v. Physical or mental health or condition vi. Sexual orientation vii. Criminal record viii. Proceedings for any offence committed or alleged to have been committed
Information Commissioner's Office (ICO)	means 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	means 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.

4.2 Applying the Data Protection Act within the charity

We will let people know why we are collecting their data, which is for the lawful purpose of managing the hall, its hiring, marketing, publicity for events, fundraising and finances. It is our responsibility to ensure PD is only used for this purpose unless specific consent is given or the PD is already in the public domain. Access to personal information will be limited to trustees, staff and volunteers.

Where individuals need to be identified in public documents e.g. minutes and harm may result, initials rather than full names will normally be used.

4.3 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



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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.

Any concerns about complying with a SAR need to be discussed promptly with the halls named DP contact or with the ICO, e.g. if it is manifestly un-factual or excessive

4.4 Responsibilities

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

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

- A. Collect 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:

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

The Management Committee will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- A. Everyone processing personal information understands that they are contractually responsible for following good data protection practice



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- B. Everyone processing personal information is appropriately trained to do so
- C. Everyone processing personal information is appropriately supervised
- D. Anybody wanting to make enquiries about handling personal information knows what to do
- E. Dealing promptly and courteously with any enquiries about handling personal information
- F. Describe clearly how the charity handles personal information
- G. Will regularly review and audit the ways it holds, manages and uses personal information
- H. Will regularly assess and evaluate its methods and performance in relation to handling personal information.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998. In case of any queries or questions in relation to this policy please contact the BVH Chairman.

4.5 Procedures for Handling Data & Data Security

BVH has a duty to ensure that appropriate technical and organisational measures and training are taken to prevent:

- A. Unauthorised or unlawful processing of personal data;
- B. Unauthorised disclosure of personal data;
- C. 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.

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.

4.6 Operational Guidance

4.6.1 Email:

All trustees, staff and volunteers should consider whether an email (both incoming and outgoing) will need to be kept as an official record. If the email needs to be retained it should be saved into the appropriate folder or printed and stored securely.

Emails that contain PD personal information no longer required for operational use, should be deleted from the personal mailbox and any "deleted items" box.



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Where someone not a trustee, employee or contractor needs to be copied into an email e.g. a wider circulation list for an upcoming event, we encourage use of bcc instead of cc, so as to avoid their PD being shared through forwarding

4.6.2 Phone Calls:

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

- i. 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.
- ii. If you have any doubts, ask the caller to put their enquiry in writing.
- iii. 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 someone with a right of access

4.6.3 Laptops and Portal Devices

All laptops and portable devices that hold data containing personal information must be protected with a suitable password which is changed regularly. Where sensitive data or financial information is held an encryption program should be used.

Ensure your laptop is locked (password protected) when left unattended, even for short periods of time.

When travelling in a car, make sure the laptop is out of sight, preferably in the boot.

If you have to leave your laptop in an unattended vehicle at any time, put it in the boot and ensure all doors are locked and any alarm set.

Never leave laptops or portable devices in your vehicle overnight.

Do not leave laptops or portable devices unattended in restaurants or bars, or any other venue.

When travelling on public transport, keep it with you at all times, do not leave it in luggage racks or even on the floor alongside you.

4.6.4 Data Security and Storage:

Store as little PD as possible relating to BVH on your computer or laptop; only keep those files that are essential. Personal data received on disk or memory stick should be saved to the relevant file on the server or laptop. The disk or memory stick should then be securely returned (if applicable), safely stored or wiped and securely disposed of.

All business critical data will be stored separately on the BVH OneDrive with access limited to essential personal such as the Chairman, Vice Chairman, and Treasurer.



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4.6.5 Passwords:

Do not use passwords that are easy to guess. Passwords should contain both upper and lower-case letters and preferably contain some numbers. Ideally passwords should be 6 characters or more in length. Protect Your Password; common sense rules are:

- i. Do not give out your password
- ii. Do not write your password somewhere on your laptop
- iii. Do not keep it written on something stored in the laptop case

4.6.6 Data Storage:

Personal data will be stored securely and will only be accessible to authorised volunteers or agents.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. For financial records and management documents will be up to 7 years. Other correspondence and emails will be disposed of when no longer required or when trustees, staff or volunteers retire.

All personal data held for the organisation must be non-recoverable from any computer which has been passed on/sold to a third party.

4.6.7 Accident Book:

This will be checked regularly. Any page which has been completed will be removed, appropriate action taken and the page filed securely.

BVH may use general photographs of events with groups of adults at the hall for publicity purposes in accordance with its lawful basis for using PD. Photos of children must not be used without the written consent of the parent or guardian. However, BVH is aware that for some individuals publicising their location could place them or their families at risk. Consequently at large events at which publicity photos may be taken a notice should be posted at the entrance, or an announcement made, providing opportunity for people to refuse taking part in publicity photographs. At small events the consent of individuals (verbal) should be obtained if their image will be clearly identifiable. Hirers are encouraged to comply with this policy.

4.6.8 Data Subject Access Request

We may occasionally need to share data with other agencies such as the local authority, funding bodies and other voluntary agencies in circumstances which are not in furtherance of the management of the charity. The circumstances where the law allows the charity to disclose data (including sensitive data) without the data subject's consent are:

- A. Carrying out a legal duty or as authorised by the Secretary of State Protecting vital interests of a Data Subject or other person e.g. child protection;



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- B. The Data Subject has already made the information public;
- C. Conducting any legal proceedings, obtaining legal advice or defending any legal rights;
- D. Monitoring for equal opportunities purposes – i.e. race, disability or religion.

We 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. If an agency asks for PD not in compliance with one of the above e.g. to obtain information about improving a service a consent form will need to be issued to the data subjects asking for their consent to pass their PD on.

We intend to ensure that personal information is treated lawfully and correctly.

4.6.9 Risk Management

The consequences of breaching Data Protection can cause harm or distress to service users if their information is released to inappropriate people, or they could be denied a service to which they are entitled. Trustees, staff and volunteers should be aware that they can be personally liable if they use customers' personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of the charity is not damaged through inappropriate or unauthorised access and sharing.