

Data Protection Policy

Cumnor Village Hall

Last updated	30 th May 2018
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Definitions

Cumnor Village Hall	means Cumnor Village Hall, registered charity number 300146.
GDPR	means the General Data Protection Regulation.
Responsible Person	Means Dr Anthony Harker.
Register of Systems	means a register of all systems or contexts in which personal data is processed by Cumnor Village Hall.

1. Data protection principles

Cumnor Village Hall is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay; and
- e. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

- a. This policy applies to all personal data processed by Cumnor Village Hall.
- b. The Responsible Person shall take responsibility for Cumnor Village Hall's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Cumnor Village Hall shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.

- c. Individuals have the right to access their personal data and any such requests made to Cumnor Village Hall shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Cumnor Village Hall must be done on one of the following lawful bases: contract (for hirers or employees of Cumnor Village Hall, or for contractors employed by Cumnor Village Hall), legal obligation (notification of information to the Charity Commissioner), consent, or legitimate interests (for example, charitable donations to Cumnor Village Hall).
- b. Cumnor Village Hall shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Cumnor Village Hall's systems.

5. Data minimisation

- a. Cumnor Village Hall shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Cumnor Village Hall does not collect any data classes as "special categories of personal data" under GDPR.
- c. Cumnor Village Hall does not collect any data on persons under 18 years of age.

6. Accuracy

- a. Cumnor Village Hall shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Cumnor Village Hall shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. Cumnor Village Hall shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

- a. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Cumnor Village Hall shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office.
- b. The Responsible Person will check to see how a recurrence can be prevented, through better processes, further training or corrective action.

Register of Systems

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The Hall	Cumnor Village Hall, registered charity number 300146.
Responsible Person	Dr Anthony Harker.
Chairman	Mr Stuart Newton
Secretary	Dr Anthony Harker
Bookings Secretary	Mrs Sandra Gee
Treasurer	Mr John Williams
Keyholder	Dr Anthony Harker

1. Categories of Person

Cumnor Village Hall holds personal data on three categories of person: in many cases one person may appear in more than one category.

- a) Officers, employees, contractors and volunteers of Cumnor Village Hall.
- b) Hirers of Cumnor Village Hall.
- c) Persons holding keys to Cumnor Village Hall on long-term loan.

2. Information Collected

- a) The only information collected for persons falling under headings 1b and 1c is name, address and contact details (email address and/or telephone number). If the person is acting on behalf of an organisation, the name of that organisation will be recorded.
- b) For persons falling under heading 1a), the information collected is name, address and contact details (email address and/or telephone number), but for committee members (who are trustees of the charity) date of birth is also recorded as required by the Charity Commissioners. For persons paid by Electronic Funds Transfer or Standing Order relevant bank details will be held.
- c) Cumnor Village Hall does not collect CCTV or other moving or still images of persons.

3. Storage and Protection of Data

- a) Information in electronic form is stored on devices, including but not limited to personal computers and mobile telephones that are the personal property of members of Cumnor Village Hall committee.
- b) Committee members are reminded of the importance both of protecting their devices with passwords and of keeping anti-virus protection up to date.
- c) Where information is kept in hard-copy form it is stored securely or destroyed as detailed below.

4. Categories of Document

Cumnor Village Hall holds personal data in the following categories of document. Details of the procedures for each category are given in Section 5.

- a) Bookings Forms.
- b) Key issue forms.
- c) Accident book.
- d) Calendar of bookings.
- e) Spreadsheet of regular users.
- f) Register of keys issued.
- g) Minutes of committee meetings.
- h) List of committee members and contact details.
- i) Correspondence associated with bookings of the Hall.
- j) Other correspondence.
- k) Other documents.

5. Data Retention Policies

This section presents, for each of the categories of data listed in Section 4, the form in which data are held and the policies for retaining such data.

a) Bookings Forms

Held in hard copy form by the Bookings Secretary, with electronic duplicates of forms for frequent hirers retained for the purposes of efficient working.

Destroyed after confirmation of completion of all financial transactions associated with the booking, with the exception of any booking for which the deposit has been withheld, for whatever reason, in which case all information will be retained until an agreed outcome between all parties.

b) Key issue forms

Held by the Keyholder as signed hard copy only, and returned to the signatory on return of the key.

c) Accident book

Hard copy only: once a report has been actioned the document is removed from the Hall and stored securely by the Chairman.

d) Calendar of bookings

Electronic copy only, maintained by Bookings Secretary, and copied only to the Keyholder and the Chairman.

Deleted one calendar year after the end of the calendar year of each booking.

- e) **Spreadsheet of regular users**
Electronic copy only, maintained by the Bookings Secretary, containing the same information as on the Bookings Form and retained on the same basis as Bookings Form information.
- f) **Register of keys issued**
Maintained as an Excel spreadsheet by the Keyholder.
Personal details deleted on return of key.
- g) **Minutes of committee meetings**
The only personal data recorded in the minutes are the names of those attending. Where matters involving bookings are discussed these will be recorded in the minutes either anonymously or under the name of an organisation. Any donations received will be acknowledged with the name of the donor, but with no further personal details.
Electronic and hard copies of the minutes are circulated to all committee members. The signed hard copy of the minutes is held by the Secretary in perpetuity.
- h) **List of committee members and contact details**
An electronic copy of this list is held by the Secretary and the Chairman, and a hard copy signed by all committee members is held by the Secretary to meet legal requirements.
- i) **Correspondence associated with bookings of the Hall**
Such correspondence, in electronic or hard copy form, is treated in the same way as the bookings forms. See a) above.
- j) **Other correspondence**
Other correspondence, in electronic or hard copy form, shall be kept for a minimum of seven years, by the Chairman or Secretary as appropriate.
- k) **Other documents**
Financial records and correspondence are held by the Treasurer for a minimum of seven years.
Other documents relevant to the functioning of the Hall (for example, the original copy of the Scheme of Governance) are held by the Secretary in perpetuity.