

Data Protection Policy

1. Introduction

Harling Old School Village Hall needs to collect and use certain types of information about the Individuals who come into contact with **Harling Old School Village Hall** in order to carry on its work. This personal information must be collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the Data Protection Act 1998 and the General Data Regulation (GDPR).

2. Data Controller

Harling Old School Village Hall is the Data Controller under the Act and the GDPR, which means that it determines what personal information is held, and what it will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

3. Disclosure

Harling Old School Village Hall may share data with other agencies such as funding bodies and other voluntary agencies.

The Individual will be made aware in most circumstances how and if and with whom their information will be shared.

These are:

- a) Carrying out a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of an Individual or other person
- c) The Individual has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion

Harling Old School Village Hall regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom it deals.

Harling Old School Village Hall intends to ensure that personal information is treated lawfully and correctly.

To this end, **Harling Old School Village Hall** will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998 and the GDPR.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for the purposes of managing the Hall, its bookings and finances and running and advertising events at the Hall and shall not be processed in any manner incompatible with that purpose or those purposes,
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s),
- d) Shall be accurate and, where necessary, kept up to date,
- e) Shall not be kept for longer than is necessary,
- f) Shall be processed in accordance with the rights of data subjects under the Act and the GDPR.
- g) 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,

Harling Old School Village Hall will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being 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

- Take appropriate technical and organisational security measures to safeguard personal information
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

4. Data collection

Informed consent is when:

- An Individual clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Harling Old School Village Hall will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, **Harling Old School Village Hall** will ensure that the Individual:

- a) Clearly understands why the information is needed
- b) Understands what it will be used for and what the consequences are should the Individual decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

5. Data Storage

Information and records relating to individuals or service users will be stored securely and will only be accessible to the elected Hall Committee Members.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

It is **Harling Old School Village Hall's** responsibility to ensure all personal data and is non-recoverable from any computer system previously used within the organisation.

6. Data access and accuracy

All Individuals have the right to access the information **Harling Old School Village Hall** holds about them. **Harling Old School Village Hall** will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, **Harling Old School Village Hall** will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it holds, manages and uses personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- The Committee members are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them

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 and/or GDPR.

In case of any queries or questions in relation to this policy please contact the **Harling Old School Village Hall** Data Protection Officer who is Mrs Christine Mclean (01953 714764)

Adopted :

Glossary of Terms

Data Controller – decides what personal information will be held and how it will be held or used.

Data Protection Act 1998 and General Data Protection Regulation (GDPR) – The legislations that provide a framework for responsible behaviour by those using personal information.

Data Protection Officer – The person responsible for ensuring that **Harling Old School Village Hall** follows its data protection policy and complies with the Data Protection Act 1998.

Individual – The person whose personal information is being held or processed by **Harling Old School Village Hall**, for example: a hirer, an employee, or supporter.

Explicit consent – is a freely given, specific and informed agreement by an Individual in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Notification – Notifying the Information Commissioner about the data processing activities of **Harling Old School Village Hall**, as certain activities may be exempt from notification.

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998 and GDPR.

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

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual, hirers, volunteers or employees within (GROUP).

Sensitive data – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings