

DATA PROTECTION POLICY

1. Introduction

Houghton Village Hall (HVH) need to collect and use certain types of Personal Data (PD) to manage the hall and its facilities. This personal information will be collected and handled securely, and HVH are committed to protecting the rights and privacy of individuals. The Data Protection Act 1998 (DPA) and the General Data Protection Regulations (GDPR) govern the use of people's PD. This data can be held on computers and mobile devices, or in a manual file, and includes emails, invoices, minutes of meetings, and photographs. HVH is the data controller for the information held. All trustees and volunteers are personally responsible for processing and using PD in accordance with the DPA and GDPR. Trustees and volunteers who have access to PD are required to read and comply with this policy.

2. Purpose

This policy sets out HVH procedures for protecting PD. HVH regard the lawful and correct treatment of PD as very important for successful working, and for maintaining the confidence of those with whom we deal. HVH recognise the risks to individuals of identity theft and financial loss if PD is lost or stolen.

3. Definitions

Data Controller - the trustees who collectively decide what PD will be held by HVH and how it will be held or used.

Act means the Data Protection Act 1998 and General Data Protection Regulations.

Data Subject – the individual whose personal information is being held or processed, such as a hirer.

Sensitive Data – includes:

- a. Racial or ethnic origins
- 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.

We do not collect sensitive data about any of our Data Subjects.

Information Commissioner's Office (ICO) - is responsible for implementing and overseeing the Act.

Personal Data (PD) – information about living individuals – such as trustees, volunteers, or hirers - 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.

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

4. Principles

The Act contains eight principles for processing PD with which HVH must comply. PD:

- a. Shall be processed fairly and lawfully and only when specific conditions are met
- b. Shall be obtained only for the purposes specified in the Act, and not processed in any manner incompatible with those purposes
- c. Shall be adequate, relevant, and not excessive in relation to those purposes
- d. Shall be accurate and, where necessary, kept up to date

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- e. Shall not be kept for longer than necessary
- f. Shall be processed in accordance with the rights of data subjects under the Act
- g. Shall be kept secure by the Data Controller using appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information
- h. 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.

5. Responsibilities

HVH is a Data Controller under the Act and is legally responsible for complying with Act. HVH will consider legal requirements and, through appropriate management and strict application of criteria and controls, will:

- 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.
- f. Take appropriate technical and organisational security measures to safeguard PD including:
 - i. Ensuring that personal information is not transferred abroad without suitable safeguards
 - ii. Treating people justly and fairly whatever their age, religion, disability, gender, sexual orientation, or ethnicity when dealing with requests for information
 - iii. Setting out clear procedures for responding to requests for information.

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

HVH will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- a. Ensuring everyone processing PD understands that they are responsible for following good data protection practice
- b. Ensuring everyone processing PD is appropriately trained to do so
- c. Ensuring anybody wanting to make enquiries about handling PD knows what to do
- d. Dealing promptly and courteously with any enquiries about handling PD
- e. Describing clearly how the charity handles PD
- f. Regularly reviewing and auditing the ways it holds, manages, and uses PD

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- a. Regularly assessing and evaluating its methods and performance in relation to handling PD.

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 Act.

In case of any queries or questions in relation to this policy, or to make a Subject Access Request (SAR), please contact bookings@houghtonvillagehall.org.uk.

6. Procedures

Collecting data: HVH will let people know that HVH is collecting their data for the lawful purpose of managing the hall, its hiring, fundraising and finances. HVH will ensure PD is only used for this purpose unless specific consent is given, or the PD is already in the public domain. Access to PD will be limited to trustees and volunteers (Appendix A).

For PD held on the HallMaster booking system or the HVH bank accounts, these organisations are the Data Controller.

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

Correcting data: Individuals have a right to make a SAR to find out whether the charity holds their PD, 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). Any concerns about complying with a SAR need to be discussed promptly with HVH Chair of Trustees or with the ICO (e.g., if it is manifestly unfactual, or excessive). Queries concerning PD held in HallMaster or by the bank should be directed to these organisations.

Handling Data & Data Security HVH has a duty to ensure that appropriate technical and organisational measures and training are taken to prevent:

- a. Unauthorised or unlawful processing of PD
- b. Unauthorised disclosure of PD
- c. Accidental loss of PD

All trustees and volunteers must therefore ensure that PD 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.

PD 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 Act. It is therefore important that all trustees and volunteers consider any information (which is not otherwise in the public domain) that can be used to identify an individual as PD and observe the guidance below.

Privacy Notice

HVH will access the name, address, phone number and email address of all hirers to effectively service the hall and its facilities. This information is made available to trustees and volunteers to enable them to provide services to hirers. Appendix A sets out what information the different trustees and volunteers have access to and why. HVH does not collect sensitive data about any of those hiring the hall and facilities.

Information about hirers held on the HallMaster booking system or in HVH bank accounts is subject to the privacy policies of those organisations.

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HVH does not sell or otherwise pass on PD of its hirers to any other organisation, except under the circumstances set out in Disclosure of Data below. HVH may occasionally use hirers contact information to inform them about events at HVH or to carry out surveys about the hall and its facilities.

7. Operational Guidance

Email: All trustees 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. Those accessing PD via HallMaster should use HVH email addresses in preference to personal email addresses.

Emails that contain PD no longer required for operational use, should be deleted from both the mailbox and any “deleted items” box.

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

Security of Computers, Laptops and Portable Devices: HVH recommend that all trustees and volunteers accessing the PD of hirers or other trustees and volunteers pay due regard to the following security procedures for devices containing PD relating to HVH:

- a. Devices should be password protected. Where sensitive data or financial information is held an encryption program is recommended.
- b. Laptops should be locked (password protected) when left unattended, even for short periods of time
- c. Laptops should be kept out of sight when travelling in a car, preferably in the boot and, if the vehicle is unattended, the doors should be locked and any alarm set
- d. Laptops and portable devices should not be left in vehicles overnight or unattended in restaurants or public venues
- e. When travelling on public transport, your laptop should be kept with you, not on luggage racks or the floor alongside you
- f. Store as little PD as possible on your computer or laptop. PD received on a portable device should be saved to your computer or laptop and then securely deleted from the portable device
- g. Ensure that data are securely deleted when disposing of any computer, laptop or portable device that has been used to store or process PD
- h. Passwords should be at least 6-characters in length and contain upper- and lower-case letters, as well as numbers.
- i. Protect Your Password by:
 - i. Not sharing your password
 - ii. Not writing your password somewhere on your laptop
 - iii. Not keeping it written on something stored in the laptop case

Data Storage: PD will only be accessible to authorised volunteers (see Appendix A). PD will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. Archival material such as minutes and legal documents will be stored indefinitely. Other correspondence and emails will be disposed of when no longer required or when trustees or volunteers retire.

All PD held for HVH must be non-recoverable from any computer which has been passed on/sold to a third party.

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Accident Book: This will be checked annually. Any page which has been completed will be removed, appropriate action taken, and a copy of the page will be filed securely in the online HVH Teams area.

Photographs: HVH may use general photographs 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, HVH 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 will be posted at the entrance, or an announcement made, providing opportunity for people to refuse appearing in 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.

8. Disclosure of Data

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

- a. Carrying out a legal duty or as authorised by the Secretary of State
- b. Protecting vital interests of a Data Subject or other person (e.g., child protection)
- c. The Data Subject 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).

HVH regard the lawful and correct treatment of PD 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) consent will be obtained from the data subjects before PD is passed on. HVH aim to ensure that PD is treated lawfully and correctly.

9. Risk Management

Breaching the Act 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 and volunteers should be aware that they can be personally liable if they use PD inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of HVH is not damaged through inappropriate or unauthorised access and sharing.

Signed:		Date:	07/06/23
Name:	DEBORAH TULL	Position:	Chair of Trustees

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Appendix A: Data availability and usage

Position	Data available	Usage
Trustees and committee members	Names, emails and phone numbers of trustees and committee members	Contact between trustees and committee members
Chair	Contact list for PopIns Name, email, phone number and address of regular hirers Trustee PD required by Charity Commission, insurers etc. Emails / Facebook comments from members of public	Communications about HVH business Communication and reporting Communication about HVH business and issues
Vice-Chair	Trustee PD required by Charity Commission, insurers etc. Names, email, phone number and address of one-off hirers Access to bookings@ email Bank details of hirers Names and email of advisors	Communication and reporting Management of bookings Confirmation of payment / repayment Sourcing Advisors
Secretary	Contact list for Pop Ins Current and recent committee papers & communications Archive of committee papers, correspondence etc.	Communications about HVH business Management of HVH Management of HVH
Treasurer	Name and bank details for regular and one-off hirers via bank account. Also name, email, phone number and address via HallMaster to view invoices.	Management of finances
Regular Bookings Secretary	Name, email, phone number and address of regular hirers Contracts signed by regular hirers Access to bookings@ email Access to one-off booking information via HallMaster.	Management of bookings and contracts
Single Bookings Secretary	Names, email, phone number and address of one-off hirers via HallMaster. Access to bookings@ email Bank details of hirers Names and email of advisors	Management of Bookings Confirmation of payment / repayment Sourcing Advisors
Publicity	Access to Facebook and Google accounts to receive and respond to queries (name / email / phone no of enquirer) Access to bookings@ email	Management of enquiries Management of system
Cinema Group	Names, emails, and phone numbers of volunteers	Organisation of events
Advisor	Name, address, email, and phone number of single hirer	Management of event