

# AUDLEM PUBLIC HALL

(Registered Charity 519458)

## DATA PROTECTION POLICY

Approved by the Management Committee on 5<sup>th</sup> October 2016

This policy is to be reviewed at the first Management Meeting after every AGM or earlier if necessary

### 1. Aims of the Policy

Audlem Public Hall Management Committee needs to keep certain information on its Users, Committee Members, Volunteers and Trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation. This policy covers Committee Members, Volunteers and Trustees of Audlem Public Hall.

### 2. Definitions

In line with the Data Protection Act 1998 principles, Audlem Public Hall Management Committee will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer. The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.

- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span

### **3. Type of information stored**

Personal information is kept in the following forms:

- Hall Booking Form (written) containing the name and address of Hall Hirer
- List of Committee Members/Trustees (written and on computer file)

Groups of people within the organisation who will process personal information are:

- Treasurer
- Reservations Secretary
- Secretary
- Chairman

No data is to be stored regarding an individual's ethnic origin, political opinions, religious beliefs, membership of a trade union or other similar association, physical or mental health, financial status or criminal convictions.

### **4. Responsibilities**

Under the Data Protection Guardianship Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of Audlem Public Hall Management Committee this is the Charity Commission.

All Management Committee Members, Volunteers and Trustees who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles. Any Committee Member found to have breached the Data Protection Policy will become subject to the Disciplinary procedure. Any Volunteer or Trustee may be asked for their resignation.

### **5. Policy implementation**

To meet our responsibilities Management Committee members, Volunteers and Trustees will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely

## **6. Training**

Training and awareness-raising about the Data Protection Act and how it is followed in this organisation will take the following forms:

### On Induction

New Committee Members, Volunteers and Trustees are given an Induction Pack that includes all Policies and Procedures agreed for Audlem Public Hall. This included the Confidentiality Policy and the Data Protection Policy.

All recipients of the Induction Pack sign a Declaration of Eligibility form which confirms acceptance of all policies

### General Training/Awareness

All Committee Members, Volunteers and Trustees are eligible to attend appropriate training courses operated by CVS Cheshire East, of which Audlem Public Hall is a member.

## **7. Gathering and checking information**

Before personal information is collected, we will consider:

- The necessary personal details that need to be identified
- The length of time that such details are required

We will inform people whose information is gathered about the following:

- why the information is being gathered
- what the information will be used for
- who will have access to their information (including third parties)

We will take the following measures to ensure that personal information kept is accurate:

- all personal data on Committee members, Volunteers and Trustees will be reviewed and updated after each AGM, or as necessary
- all personal data on Hall users will be relevant completed by the user themselves and relevant only to the actual hire of the hall.

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

## **8. Data Security**

Audlem Public Hall Management Committee will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- all personal data on computer files will be password protected and backed up regularly
- all written personal data will be retained in a secure place in the home of authorised Committee Members i.e. Chairman, Reservations Secretary, Treasurer and Secretary or in a locked cabinet in the Hall

Any unauthorised disclosure of personal data to a third party by a Committee Member may result in the activating the Disciplinary procedure. Any unauthorised disclosure of personal data to a third party by a Volunteer or Trustee may result in their required resignation.

## **9. Subject Access Request**

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong. Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Secretary, Audlem Public Hall, Cheshire Street, Audlem CW3 0AH. We may make a charge of £10 on each occasion access is requested.

The following information will be required before access is granted:

- proof of identity (passport or identity card)
- their relationship with the organisation (former/ current member of staff, trustee or other volunteer, service user)
- any other relevant information- e.g. timescales involved

Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request (and relevant fee).

## **10. Review**

This policy will be reviewed at the first Management meeting after each AGM or earlier as necessary to ensure it remains up to date and compliant with the law.