

Beckley Village Hall

BVH DN25

Data Protection Policy

This document is the Data Protection Policy of Beckley and Stowood Village Hall ("Hall") CIO (the "Trust")

Our policy is to keep our data collection and use activities to the minimum necessary for the running of the Hall and to take reasonable steps to ensure legal compliance.

We are registered with the Information Commissioner's Office

Our CCTV policy is covered separately in DN29.

GDPR Guidelines prepared by Community First with the Trust's comments highlighted.

Good information handling makes good business sense.

Apply common sense to the GDPR principles and think more about risk assessment rather than creating numerous policies that people will not look at or follow.

The main point of the new data handling law is about protecting personal information. People may suffer identity theft and perhaps incur financial loss if their details are not protected.

It makes good sense to ensure personal information is processed for the purpose it was provided for, handled securely, not shared with any other organisation and to allow the individual to contact you should they wish their information to be changed in any way or deleted. We only keep and share data as necessary for the management of the Hall (to allow the Trustees and users to keep in touch), for hiring purposes and to let the local community know of Hall events. Data is not shared with any other organisation.

The basic principles to think about are detailed below, which should then help you complete this document. This provides the backbone to your GDPR responsibilities and covers the main principles that you need to comply with.

Basic principles

1. Understand the data you have and where it is stored. The data is stored on the various computers of the Trustees and users and on the Hall website. We have advised all Trustees and users to password protect their computers (which should have appropriate anti-virus software) and data that we consider to be sensitive that is on the Hall website is also password protected with the password only known to the website Administrator, Booking Secretary and Trustees.
2. Check your security – you must ensure that personal data is held securely.

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- Password protect your electronic devices Done – - see above
 - Ensure you are using up to date anti-virus software. Done – - see above
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 - Paper records should be stored under lock and key. Records are only held in private homes and so subject to normal private security.
 - If you are sharing personal information we would recommend password protecting the file containing the information before sending (this is simple to do if you use Excel or Word documents). This will be implemented from the date of this policy.
3. You will need a separate policy if the information you hold is “special category data” e.g. includes health records, information about someone’s race, religion or sexual orientation. This should not be necessary for hall purposes. We do not hold such data.
4. When collecting data/individual completing an application form, ensure the following is included somewhere on the form. This will form your Privacy Notice.

At Beckley and Stowood Village Hall CIO we are committed to protecting and respecting your privacy. We will only use the information you have provided for the necessary administration, operation and marketing of the village hall. Information collected will not be shared with any other organisation and we promise to take reasonable measures to keep your details safe and secure. We will only keep your data for as long as necessary. If you wish to find out what information we hold or to amend the information, please contact the Booking Secretary.

How long to we plan to keep the data?

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Keep data only as long as needed to fulfill a particular contract i.e. a one off booking for a party-keep until payment has been completed and deposit returned ect..

Regular ongoing bookings, keep securely.

Financial records and correspondence to be kept for a minimum of 7 years.

The accident book needs to be checked regularly. A page that has been completed needs to be torn out, appropriate action taken and filed securely.

All personal data to be destroyed when no longer needed.

Old paper copies should be shredded. Duplicate copies of minutes and correspondence destroyed after 3 years.

Keep archived important documents such as deeds, minute books and historical archive material in a locked filing cabinet in a known location.

CCTV footage is covered by Data Protection legislation and by the Protection of Freedoms Act (POFA) and the Human rights act 1998. Particular care is needed for the use, recording, storage and access to the material. We have discussed this with the local police and have agreed a compliant protocol for recordings taken outside the Hall but that is not stated here for reasons of necessary confidentiality. Recordings taken inside the Hall are kept confidential on our server and in the event of a circumstance arising which may lead to a request to view the recordings then a group of at least three members of the Management Committee would discuss whether and how to allow such a viewing taking account of the relevant legislation.

Do we have a function/ reason for every piece of data we collect?

Is the data you collect used for the legitimate purpose for which it is collected for? Yes

What is the process if you suffer a data breach e.g paperwork or IT devices are lost or stolen, malware is used to gain access to your computer system.

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A personal data breach means a breach of security leading to the destruction, loss, alternation, unauthorised disclosure of, or access to personal data.

Any potential personal data breach must be reported to the **Trust Chair** who will investigate and ascertain if the data breach was likely to result in a risk to the individual, for instance damage to reputation, financial loss, loss of confidentiality. If this is the case the ICO must be made aware within 72 hours of the incident being reported.

If in doubt, the ICO helpline 0303 123 1113 can provide clarification.

The **Trust Chair** will check to see how a recurrence can be prevented, through better processes, further training or corrective action.

What is the process if someone wants to know what information we hold on them, update the information or be removed from our records?

If an individual wishes to access any personal data that we hold on them, they need to apply in writing. Steps must be taken to confirm the identity of the individual before providing the information, requiring both photo identification and confirmation of address.

Any changes requested to the data, including removal, requested by the individual, must be actioned as soon as possible.

How do we ensure in the future that we continue to respect the wishes of those whose data we hold?

We will include the following footnote on all correspondence issued by or on behalf of the Trust

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Reference documents:

<https://ico.org.uk/media/for-organisations/documents/2258293/eight-practical-steps-for-micro-business-owners.pdf>

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Data Protection for Village Halls and Community Buildings – A Preliminary Guide. Available from CFO.

ICO helpline for small organisations: 0303 123 113 and select option 4