



Naphill Village Hall & Playing Fields Council

## Data Protection Policy

### 1.0 Introduction and Purpose

- 1.1 The Trustees of Naphill Village Hall & Playing Fields Council are defined by legislation as Data Controllers.
- 1.2 The purpose of this policy is to ensure that we comply with Data Protection Act 1998 (DPA) and the General Data Protection Regulations (GDPR) legislation that came into effect in May 2018. This legislation concerns any personal data that the Village Hall Council and/or any of its Trustees collect(s) as part of its/their function.
- 1.3 Trustees understand that the lawful and correct treatment of personal information is important to successful, trust based working.

### 2.0 Definition of Personal Data

- 2.1 Personal data is any data that relates to an identifiable individual, such as name, address, contact details, age and date of birth, gender, family details, email addresses, CCTV footage, financial information, photos of identifiable people.
- 2.2 The purpose of the legislation is to protect an individual from unauthorised access or use of their personal data which could result in identity fraud, financial loss or reputational loss.

### 3.0 Our Commitment

3.1 We will let people know why we are collecting their data, which will be for the purposes of managing the hall, lettings and finances and for any purposes that the law may require. We will not pass on any personal data that we collect or hold without the specific consent of the individual(s) concerned or unless the law demands that we do so. Access to personal information will be limited to current Trustees only.

3.2 Each individual whose personal data we hold has the following rights:

- The right to be informed of any processing that is undertaken
- The right of access to their own information that we hold
- The right to prevent processing in certain circumstances
- The right to correct, rectify, block or erase information which is regarded as incorrect
- The right to be removed from our database on request (unless the information we hold is necessary for financial, audit or legal purposes)

### 4.0 The 8 Data Protection Principles

4.1 **First principle** - Personal data must only be used for the legitimate purpose for which it was originally collected.

4.2 **Second principle** - Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes. It cannot be further processed or shared with others in a manner incompatible with those purposes without consent from the individual. Individual consent must be on an “opt in” basis and any consent obtained prior to May 2018 must be re-confirmed. Consent can be withdrawn at any time.

4.3 **Third principle** - Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.

4.4 **Fourth principle** - Personal data shall be accurate and, where necessary, kept up to date.

4.5 **Fifth principle** - Personal data processed shall not be kept for longer than is necessary for that purpose or those purposes.

4.6 **Sixth principle** - Personal data shall be processed in accordance with the rights of data subjects under the Data protection Act.

- 4.7 **Seventh principle** - Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- 4.8 **Eighth principle** - Personal data 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 data.

## 5.0 Responsibilities

- 5.1 We are not required to appoint a Data Protection Officer (DPO) however the Trustee with specific responsibility for Data Protection is Judy Whitehouse.
- 5.2 The Treasurer is responsible for renewing the Village Hall Council's Data Protection registration ref ZA011475 annually.
- 5.3 All Trustees are responsible for holding personal data that they use in connection with their role securely. This means keeping any paperwork in a locked filing cabinet and using personal computer devices that are password protected and have up to date anti-virus and malware protection.
- 5.4 All Trustees are responsible for ensuring that they only use personal data collected as part of their function in accordance with the purposes listed in the Schedule in Appendix A.
- 5.5 Trustees are aware that in the event an individual makes a request for the personal data we hold about them this could include emails sent from their personal email account if it is regarding village hall business. Any Trustee who has concerns about this can request a specific [xxxxx@naphillvillagehall.org.uk](mailto:xxxxx@naphillvillagehall.org.uk) email account.

## 6.0 Privacy Statement

### 6.1 General Privacy Statement

The Village Hall Council uses personal data for the purposes of managing the hall and holds information regarding Trustees, hall bookings, suppliers and contractors, volunteers, running fundraising events, donations and financial information. We do not use personal data for any other purposes. Personal data will be retained for 7 years for financial purposes and for 1 year for any other purpose. The

exception is that minutes of meetings that contain names will be retained indefinitely for the purposes of providing a historic record of village hall.

If you would like to find out more about how we use your personal data or want to see a copy of the information that we hold about you then please contact our Secretary [secretary@naphillvillagehall.org.uk](mailto:secretary@naphillvillagehall.org.uk).

## 6.2 Web Site Privacy Statement

By using our website, you agree to us placing cookies on your computer. Cookies are small text files created by websites you have visited that store browsing information like the pages you visit. The next time you visit the site, the cookie will tell the site that you have been there before. We use this information to improve our website and enhance your experience on our site, for example to avoid showing you information or screens you have already seen. We use two types of cookies:

- First-party cookies are set by the site you are visiting
- Third-party cookies come from other sites that have items embedded in our pages (for example Google Analytics which we use to monitor visitors to our web site)

Please note that cookies cannot harm your computer and the cookies we create do not store any information that could personally identify you.

## 6.3 Hall Bookings Privacy Statement

When you use our online booking system it gives you the option whether to display your name, email address and telephone number publicly, or to keep them private.

In the event that you inadvertently make your details public you can contact our Lettings Secretary who will ensure they are made private.

## 6.4 CCTV Privacy Statement

The use of CCTV is covered by both Data Protection and Freedom of Information legislation. The village hall use CCTV monitoring 24 x 7 for the purposes of deterring and preventing crime and protecting our premises. CCTV footage is not used for any other purposes but images captured will be passed on to the police where appropriate.

In general, CCTV footage is stored for around 28 days and is then overwritten.

## 6.5 Trustee Details Privacy Statement

Trustee names will be published on the web site but not their addresses or telephone numbers. Contact email addresses on the web site will be generic and in the format [xxxxx@naphillvillagehall.org.uk](mailto:xxxxx@naphillvillagehall.org.uk).

In meeting minutes, Trustees will be referred to by name but no other personal details will be used. In the event that it is necessary to minute more than just a Trustee name then any other details will be redacted when the minutes are made public.

## 6.6 Accident Book Privacy Statement

Accident records containing personal data will not be left in the Accident Book and will be removed and stored securely.

## 7.0 Trustee Use of Email

7.1 When carrying out our village hall duties, Trustees will inevitably use email and such emails contain information (name and email address at the very least) by which an individual can be recognised. All village hall emails therefore fall within the scope of this policy.

7.2 Any Trustee may request a separate [xxxxx@naphillvillagehall.org.uk](mailto:xxxxx@naphillvillagehall.org.uk) email address that is specifically used for village hall business.

7.3 Trustees will need to consider whether emails they have need to be kept as an official record. If so then they should be saved into a village hall specific folder or printed and stored securely.

7.4 Any emails that are no longer required for operational use should be deleted permanently from the personal mailbox and from any deleted items folders.

## 8.0 Telephone Calls

8.1 Telephone calls can result in unauthorised use or disclosure of personal information. Trustees will be aware of the following guidelines:

8.2 Personal information should not be given out over the telephone unless you have no doubts as to the caller's identity and that the information requested is innocuous.

8.3 If you have any doubts, ask the caller to put their request in writing.

8.4 If you receive a call requesting personal information be aware that the caller could be impersonating someone else. If in any doubt, the correct thing to do is to take the callers details and contact the person yourself to pass on a message.

## **9.0 Data Breaches**

A data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. It is a legal requirement that certain types of data breach are reported to the Information Commissioner's Office 0303 123 1113 within 72 hours of the data breach occurring.

It is unlikely that the Village Hall Council will experience a major data breach because of the very limited personal data it holds but Trustees are made aware of this requirement through this policy.

Specifically, Trustees will need to report to the Chairman if their computer, tablet, mobile phone, memory stick etc. used for village hall purposes is stolen, or if the same applies to paper files held.

## **10.0 Subject Access Requests**

Any individual may contact the Village Hall Council to request full details of the personal information we hold about them. This is called a Subject Access Request (SAR).

Requests should be passed to the Secretary who will acknowledge receipt and co-ordinate a response within the 30 day timescale.

## **Approval**

This policy has been approved by the Council at its meeting on 2<sup>nd</sup> May 2022.

**Date for next review: May 2024**

## Appendix A – Schedule of Personal Data Held by Village Hall Trustees

Data Item	Person Responsible	Where Held	Distributed To	Retention Period
Trustee contact details	Secretary	Home PC	All current Trustees	Deleted when someone is no longer a member
Trustee contact details inc DOB	Secretary	Charity Commission web site	Available on the internet	Deleted when someone is no longer a Trustee
Lettings details	Lettings Secretary			
Accident Book	Norma Clarke	Kitchen	Not distributed	Completed sheets removed and stored securely at Norma's house
Lettings	Lettings Secretary	Securely at Tanya's house	Displayed on web site if not marked Private	7 full financial years
Invoices	Treasurer	Securely at Treasurer's house	Not distributed	7 full financial years
Minutes (current year)	Secretary Individual Trustees	Minute Folder at Sec's house Individual Trustees Dropbox	All Trustees Displayed on web site	Master versions are retained indefinitely. Web site versions are redacted where applicable
Minutes (archive)	Secretary Individual Trustees	Dropbox Individual Trustees Filing cabinet in loft	Displayed on web site	Master versions are retained indefinitely. Web site versions are redacted where applicable
Sale of tickets and payment for events	Naphill Festival Committee	Eventbrite System	Not distributed	Eventbrite policy
Personal details of suppliers and contractors	Maintenance Committee	Norma's house	Only people who need to use the supplier	For as long as contractor is used
Bank details of suppliers, contractors and Trustees	Treasurer	Treasurer's computer	Not distributed	7 full financial years