



PEMBURY VILLAGE HALL MANAGEMENT COMMITTEE
Charity No: 280265

Data Protection Policy

1] Data Protection Policy and Procedures

Pembury Village Hall is registered with the Charity Commission as Charity no. 280265. The hall is managed by the Pembury Village Hall Management Committee [PVHMC]. We are committed to a policy of protecting the rights and privacy of individuals. We need to collect and use certain types of personal data in order to carry on our work of managing the village hall but we recognise that this data must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of any personal data we may hold about people who manage or use the facilities. Personal data may be held on computers, laptops and mobile devices, or in a manual file; this includes emails and minutes of meetings.

The charity will remain the data controller for the information held. The trustees and managers are responsible for processing and using personal data in accordance with the DPA/GDPR and will therefore be expected to read and comply with this policy.

2] Purpose

The purpose of this policy is to set out the PVHMC commitment to and procedures for protecting personal data. The trustees regard the lawful and correct treatment of any personal information we hold as very important to successful working, and to maintaining the confidence of those with whom we deal. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen. PVHMC will not sell, transfer or disclose any personal data to third parties.

The following are definitions of the terms used in this policy:

'Data Controller' - the trustees, who collectively decide what personal information PVHMC will hold and how it will be held or used.

'Data Subject' - the individual whose personal information is being held or processed by PVHMC; this includes a trustee or manager and a regular or private hirer.

'Personal Data' - information about living individuals that enables them to be identified, e.g. names, addresses, telephone numbers and email addresses. This does not apply to information about organisations, companies and agencies; it only applies to named persons, such as individual trustees or hirers of the hall.

'Processing' - collecting, amending, handling, storing or disclosing personal information.

'Data Protection Officer' - the person responsible for ensuring that PVHMC follows its data protection policy and complies with the data protection legislation.

'Information Commissioner's Office (ICO)' - the ICO is responsible for implementing and overseeing the Data Protection Act 1998 and GDPR.

3] The Data Protection Act

This contains eight principles for processing personal data with which we must comply. These principles are as follows.

Personal data shall be:

- *processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,*
- *obtained only for one or more of the purposes specified in the DPA/GDPR, and shall not be processed in any manner incompatible with that purpose or those purposes,*
- *adequate, relevant and not excessive in relation to those purpose(s).*
- *accurate and, where necessary, kept up to date,*
- *processed in accordance with the rights of Data Subjects under DPA/GDPR,*
- *kept secure by the Data Protection Officer who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,*

Personal data shall not be:

- *kept for longer than is necessary,*
- *transferred to a country outside the European Economic Area unless that country ensures an adequate level of protection for the rights and freedoms of Data Subjects in relation to the processing of personal information.*

4] Applying the Data Protection Act within the charity

PVHMC will let people know why we are collecting their data, namely for the purpose of managing Pembury Village Hall, its bookings and finances. It is our responsibility to ensure the data is only used for this purpose. Access to personal information will be limited to trustees and managers.

5] Responsibilities

PVHMC is the Data Controller under DPA/GDPR, and is legally responsible for complying with the legislation, which means that it determines for what purposes personal information held will be used. PVHMC will take into account legal requirements and ensure that it is properly implemented through appropriate management, strict application of criteria and controls.

The Data Controller will:

- collect and use information fairly.
- specify the purposes for which information is used.
- collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with legal requirements.
- ensure the quality of information used.
- ensure the rights of people about whom information is held, can be exercised under DPA/GDPR. These include:
 - i) The right to be informed that processing is undertaken.
 - ii) The right to access one's personal information.
 - iii) The right to prevent processing in certain circumstances, and
 - iv) The right to correct, rectify, block or erase wrong information.
- take appropriate technical and organisational security measures to safeguard personal information,
- ensure that personal information is not transferred abroad without suitable safeguards,

- 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.

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

The Data Protection Officer will be responsible for checking that the policy has been implemented and will have overall responsibility for:

- ensuring everyone processing personal information understands that they are contractually responsible for following good data protection practice,
- ensuring everyone processing personal information is appropriately trained to do so,
- ensuring everyone processing personal information is appropriately supervised
- ensuring anybody wanting to make enquiries about handling personal information knows what to do,
- dealing promptly and courteously with any enquiries about handling personal information and Subject Access Requests
- describing clearly how the charity handles personal information
- reviewing and auditing the ways it holds, manages and uses personal information
- assessing and evaluating its methods and performance in relation to handling personal information.

6] Subject Access Requests.

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, 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. Reasonable steps must be taken to confirm the identity of the individual before providing any information to them.

7] Data Protection Officer.

Anyone wishing to make an SAR should contact the Data Protection Officer:

by email - pemburyvh@gmail.com, or

by post - **Pembury Village Hall, 49 High Street, Pembury, Kent TN2 4PH.**

The Data Protection Officer is also responsible for reporting any DPA/GDPR breaches to the ICO and the Charity Commission.

8] Procedures for Handling Data & Data Security

PVHMC has a duty to ensure that appropriate technical and organisational measures and training are taken to prevent:

- Unauthorised or unlawful processing of personal data
- Unauthorised disclosure of personal data
- Accidental loss of personal data

All trustees and managers must therefore ensure that personal data 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 e.g. pc or mobile phone.

Personal data relates to data of living individuals who can be identified from that data where 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 DPA/GDPR. It is therefore important that trustees and managers treat any information (which is not otherwise in the public domain) that can be used to identify an individual as personal data and follow these policy guidelines.

9] Privacy Notice and Consent Policy

Pembury Village Hall uses some personal data for the purposes of managing the hall, its bookings and finances. Personal data may be retained for up to 7 years for accounts purposes and potentially for longer where required by the Hall's insurers.

PVH Trustees will be asked to consent to the storage and processing of some personal data to send them agendas and minutes of PVHMC meetings and consult them on certain management issues which arise between meetings.

PVH Managers will be asked to consent to the storage and processing of some personal data to enable trustees and other managers to communicate with them. Their addresses, private telephone numbers and email addresses will only be used internally for PVH business purposes.

Regular Users will be asked to consent to the storage and processing of some personal data to secure and/or amend their bookings, maintain contact with them during the period of hire and subsequently to issue invoices to them. Their contact details may also be shown in the Village Diary on the *pembury.org* web-site, but only if the hirer elects to supply that information to the managers of the web-site.

Private Hirers will be asked to consent to the storage and processing of personal data to secure their booking requests, maintain contact with them during the period of hire and subsequently to refund any deposits paid. Their contact details will not be available to view via the *pembury.org* web-site.

PVHMC does not run its own web-site; neither does it use or make personal data available on social media. Trustees of the village hall are listed by name only on the Charity Commission web-site.

This policy was approved at a meeting of the PVHMC in July 2018. It 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.