



HOLMER GREEN VILLAGE CENTRE

The Common, Holmer Green, HP15 6GX

www.holmergreenvillagehall.org.uk

Registered Charity No: 300281

'Serving the needs of the Village'

DATA PROTECTION POLICY

Scope of the policy

This policy applies to the operations of the HolmerVillage Centre (hereafter 'the HGVC'). The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the HGVC Committee Members to ensure that the HGVC is compliant. This policy should be read in tandem with the HGVC's Privacy Policy.

Why this policy exists

This data protection policy ensures that the HGVC:

- Complies with data protection law and follows good practice
- Protects the rights of individuals
- Is open about how it stores and processes personal data
- Protects itself from the risks of a data breach.

General guidelines for Committee Members

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the users of the HGVC and to others involved in its management
- Data should not be shared informally or outside of the HGVC
- The HGVC will, if required, provide induction training to Committee Members to help them understand their responsibilities when handling personal data
- Committee Members should keep all data secure, by taking sensible precautions and following the guidelines below
- Strong passwords must be used and they should never be shared
- Personal data should not be shared outside of the HGVC unless with prior written consent and/or for specific and agreed reasons
- Personal data should be reviewed and consent refreshed periodically via the membership renewal process or when policy is changed.

Data protection principles

The General Data Protection Regulation identifies 8 data protection principles:

- Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner
- Principle 2 - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.
- Principle 4 – Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.
- Principle 5 – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.
- Principle 6 - Personal data must be processed in accordance with the individuals' rights.
- Principle 7 - Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- Principle 8 - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

Lawful, fair and transparent data processing

The HGVC requests personal information from individuals for the purpose of sending communications about their involvement with the HGVC. The forms used to request personal information will contain a privacy statement informing these individuals as to why the information is being requested and what the information will be used for. individuals will be asked to provide consent for their data to be held and a record of this consent will be securely held. Individuals will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once an individual requests not to receive certain communications this will be acted upon promptly and the individual will be informed as to when the action has been taken.

Processed for Specified, Explicit and Legitimate Purposes

Individuals will be informed as to how their information will be used and the Committee of the HGVC will seek to ensure that personal data is not used inappropriately. Appropriate use of information provided by individuals will include:

- Communicating with individuals about the HGVC's events and activities
- Communicating with individuals about specific issues that may have arisen concerning the HGVC.

The HGVC will ensure that personal data is managed in such a way as to not infringe an individual's rights which include:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.

Adequate, Relevant and Limited Data Processing

Individuals associated with the HGVC will only be asked to provide information that is relevant for their involvement with the HGVC. This will include:

- Name.
- Postal address.
- Email address.
- Telephone number.

Where additional information may be required, such as health-related information, this will be obtained with the specific consent of the individual who will be informed as to why this information is required and the purpose for which it will be used.

There may be occasional instances where an individual's data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the individual or the HGVC in these instances where the HGVC has a substantiated concern then consent does not have to be sought from the member.

Accuracy of Data and Keeping Data up to Date

The HGVC has a responsibility to ensure individual's information is kept up to date. Individuals will be required to let the Secretary know if any of their personal information changes.

Accountability and Governance

The HGVC Committee is responsible for ensuring that the HGVC remains compliant with data protection requirements and can evidence that it has. For this purpose, those from whom data is required will be asked to provide written consent. The evidence of this consent will then be securely held as evidence of compliance. The HGVC Committee shall ensure that new individuals becoming involved with the HGVC receive an induction into how data protection is managed within the HGVC and the reasons for this. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

Secure Processing

The Committee Members of the HGVC have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee Members using strong passwords
- Committee Members not sharing passwords
- Restricting access of sharing personal data to those on the Committee who need to communicate with individuals on a regular basis
- Using password protection on laptops and PCs that contain or access personal information
- Using password protection or secure cloud systems when sharing data between Committee Members
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

Subject Access Request

Individuals about whom the HGVC holds personal data are entitled to request access to the information that is held by the HGVC. The request needs to be received in the form of a written request to the Secretary of the HGVC. On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. The HGVC will provide a written response detailing all information held on the individual. A record shall be kept of the date of the request and the date of the response.

Data Breach Notification

Were a data breach to occur, action shall be taken to minimise the harm by ensuring all Committee Members are aware that a breach had taken place and how the breach had occurred. The Committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. Where necessary, the Information Commissioner's Office would be notified. The committee shall also contact relevant individuals to inform them of the data breach and actions taken to resolve the breach.

If an individual contacts the HGVC to say that they feel that there has been a breach by the HGVC, a Committee Member will ask the individual to provide an outline of their concerns. If the initial contact is by telephone, the Committee Member will ask the individual to follow this up with an email or a letter detailing their concern. The concern will then be investigated by Members of the Committee who are not in any way implicated in the breach. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Policy review date: 1 April 2020

Signed on behalf of the HGVC Committee:



Date:

1 April 2018