

Aims of this Policy

Foxton Village Hall Trust needs to keep certain information on its employees, hirers, contractors, 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 trustees, volunteers, employees.

Definitions

In line with the Data Protection Act 1998 principles, Foxton Village Hall Trust 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 paper based personal data as well as that kept electronically.

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 their personal data and who has used this data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

Type of information processed

Foxton Village Hall processes the following personal information:

- Information on applicants for posts, including references
- Employee information – contact details, personal information, bank account details, payroll information
- Trustees – contact details, personal information.
- Hirers – contact details, details of enquiries, visits, bookings and details for invoicing or reimbursement.
- Contractors and volunteers - contact details

Personal information is kept in the following forms: electronically and on paper.

People within the organisation who will process personal information are: Booking Secretary, Treasurer, Billings Clerk, Facilities Manager, Trustees.

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 Foxton Village Hall this is the Foxton Village Hall Trust.

The governing body delegates tasks to the Data Controller. The Data Controller is responsible for:

- understanding and communicating obligations under the Act
- identifying potential problem areas or risks
- producing clear and effective procedures

All employed staff, trustees and volunteers who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy may result in

- an employee - disciplinary proceedings
- a trustee - personal liability for any penalty arising from a breach that they have made.
- a volunteer - the termination of the volunteering agreement.

Policy Implementation

To meet our responsibilities Foxton Village Hall Trust will:

- Ensure any personal data is collected in a fair and lawful way
- Ensure that only the minimum amount of information needed is collected and used
- Ensure the information used is up to date and accurate
- Ensure it is kept safely
- Ensure the information is deleted or destroyed when no longer needed
- 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 and legal obligations
- Queries about handling personal information will be dealt with swiftly and politely

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, provision of a copy of this policy and links to relevant websites
- General training/ awareness raising: Annual reminders to staff/ trustees and other volunteers at the Annual General Meeting.

Gathering and checking information

Before personal information is collected, we will consider:

- is it necessary
- how will it be stored
- who will have access to it
- how long to keep it

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) (in most cases, this is simply stated on the form that they complete)

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

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

Data Security

The organisation 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:

- Using lockable storage with restricted access to keys
- Password protection on electronic devices
- Password protected attachments for sensitive personal information sent by email

Any unauthorised disclosure of personal data to a third party by

- an employee may result in disciplinary proceedings
- a trustee may result in personal liability for any penalty arising from a breach that they have made.
- a volunteer may result in the termination of the volunteering agreement.

Subject Access Requests

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 Chair of Foxton Village Hall Trust.

The following information will be required before access is granted:

- full name and contact details of the person making the request
- their relationship with the organisation (former/ current employee, trustee or other volunteer, service user
- We may also require proof of identity before access is granted. The following forms of ID will be accepted: passport/ photo driving licence/birth certificate.

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.

Review

This policy will be reviewed at intervals of three years to ensure it remains up to date and compliant with the law.

Declaration

This is incorporated with annual signing for trustees & in contracts for employees. I confirm I have read and understood Foxton Village Hall's Data Protection Policy and will act in accordance with it.

Privacy Statement

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