

# Falfield Village Hall GDPR policy

---

## General Data Protection Regulations (GDPR) Falfield Village Hall Management Committee

### Data list or map for Falfield Village Hall

<b>Chairman</b>	Desktop/Laptop/Tablets/Mobile Phone - names, email addresses and telephone numbers for trustees, volunteers and staff. Diary - names and telephone numbers. Mobile – names and telephone numbers.
<b>Secretary</b>	Desktop/Laptop/Tablets/Mobile Phone - dates of birth of trustees (required for Charity Commission return), names, email addresses, telephone numbers and addresses for trustees, staff and volunteers, correspondence with hirers and other local people. Diary - names and telephone numbers. Home phone and Mobile – names and telephone numbers. Paper files - records from hall Accident Book. Correspondence with insurers regarding claims and volunteer cover. Hall archives.
<b>Treasurer</b>	Desktop/Laptop/Tablets/Mobile Phone - names, telephone numbers, email addresses of trustees; names, email addresses, addresses and bank details of hirers (invoicing & receipts) and employees. Memory Stick – recent financial records. Mobile phone – trustee names and numbers.
<b>Committee members/ trustees</b>	Desktop/Laptop/Tablets/Mobile Phone – names, email addresses, telephone numbers of trustees, volunteers and friends who help run fundraising events. Photos of people at events.
<b>Staff -Booking Secretary</b>	Desktop/Laptop/Tablets/Mobile Phone – names, telephone numbers, email addresses, addresses of hirers and enquirers. Mobile – names and numbers for trustees and regular hirers.
<b>Volunteers</b>	Gardener – mobile – trustee numbers.
<b>Other</b>	

# Falfield Village Hall GDPR policy

---

## THE DATA PROTECTION PRINCIPLES

1. Personal data shall be processed fairly and lawfully and in a transparent manner.
2. 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.
3. Personal data shall be adequate, relevant, and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organizational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. 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.

# Falfield Village Hall GDPR policy

---

**Name of Charity: Falfield Village Hall (FVH)**

## **DATA PROTECTION POLICY AND PROCEDURES**

### **Introduction**

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 (PERSONAL DATA) in order to carry on our work of managing Falfield Village Hall (FVH). This personal information must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of information about people (personal data). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs.

The charity will remain the data controller for the information held. The trustees, staff and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees, staff and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

### **Purpose**

The purpose of this policy is to set out the [FVH] commitment and procedures for protecting personal data. Trustees regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

The following are definitions of the terms used:

Data Controller - the trustees who collectively decide what personal information [FVH] will hold and how it will be held or used.

Act means the Data Protection Act 1998 and General Data Protection Regulations - the legislation that requires responsible behaviour by those using personal information.

Data Protection Officer (if appointed) – the person responsible for ensuring that [FVH] follows its data protection policy and complies with the Act. [FVH] is not required to appoint a DPO.

Data Subject – the individual whose personal information is being held or processed by [FVH] for example a donor or hirer.

‘Explicit’ consent – is a freely given, specific agreement by a Data Subject to the processing of personal information about her/him.

Explicit consent is needed for processing “sensitive data”, which includes:

- a) Racial or ethnic origin of the data subject
- b) Political opinions
- c) Religious beliefs or other beliefs of a similar nature

# Falfield Village Hall GDPR policy

---

- d) Trade union membership
- e) Physical or mental health or condition
- f) Sexual orientation
- g) Criminal record
- h) Proceedings for any offence committed or alleged to have been committed

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

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – information about living individuals that enables them to be identified – e.g. names, addresses, telephone numbers and email addresses. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers.

## The Data Protection Act

This contains 8 principles for processing personal data with which we must comply.

### Personal data:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary, **(this needs to be looked at recorded)**
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Controller **(if selected)** who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.
8. 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 information.

## Applying the Data Protection Act within the charity

We will let people know why we are collecting their data, which is for the lawful purpose of managing [the hall], its hiring, marketing, publicity for events, fundraising and finances. It is our responsibility to ensure PERSONAL DATA is only used for this purpose unless specific consent is given or the PERSONAL DATA is already in the public domain. Access to personal information will be limited to trustees, staff and volunteers.

Where individuals need to be identified in public documents e.g. minutes and harm may result, initials rather than full names will normally be used.

# Falfield Village Hall GDPR policy

---

## Correcting data

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. Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill, bank or credit card statement.

Any concerns about complying with a SAR need to be discussed promptly with the halls named DP contact or with the ICO, e.g. if it is manifestly unfactual or excessive.

## Responsibilities

[FVH] is the Data Controller under the Act, and is legally responsible for complying with Act, which means that it determines what purposes personal information held will be used for.

The management committee will take into account legal requirements and ensure that it is properly implemented, and will through appropriate management and strict application of criteria and controls:

- a) Collect and use information fairly.
- b) Specify the purposes for which information is used.
- c) Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.
- d) Ensure the quality of information used.
- e) Ensure the rights of people about whom information is held, can be exercised under the Act.

These include:

- The right to be informed that processing is undertaken.
- The right of access to one's personal information.
- The right to prevent processing in certain circumstances, and
- The right to correct, rectify, block or erase information which is regarded as 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, staff and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

# Falfield Village Hall GDPR policy

---

The Management Committee will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- a) Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- b) Everyone processing personal information is appropriately trained to do so
- c) Anybody wanting to make enquiries about handling personal information knows what to do
- d) Dealing promptly and courteously with any enquiries about handling personal information
- e) Describe clearly how the charity handles personal information
- f) Will regularly review and audit the ways it holds, manages, and uses personal information
- g) Will regularly assess and evaluate its methods and performance in relation to handling personal information.

This policy 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.

In case of any queries or questions in relation to this policy please contact [the Data Protection Officer].

## Procedures for Handling Data & Data Security

[FVH] 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, staff and volunteers 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. tablet or mobile phone.

Personal data relates to data of living individuals who can be identified from that data and 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.

It is therefore important that all staff consider any information (which is not otherwise in the public domain) that can be used to identify an individual as personal data and observe the guidance given below.

# Falfield Village Hall GDPR policy

---

## PRIVACY NOTICE AND CONSENT POLICY

The privacy notice and consent policy are as follows:

### Privacy Policy

#### General Data Protection Regulations (GDPR) & Falfield Village Hall Management Committee

Personal information is a valuable resource that Falfield Village Hall Management Committee (FVHMC) takes measures to protect from loss or corruption, unauthorised access and modification. Such information and the way it may be processed is subject to UK law, specifically the General Data Protection Regulations 2018 (GDPR).

FVHMC is committed to safeguarding and preserving the privacy of our customers. This Privacy Policy explains what happens to any personal data that is provided to us, either directly, indirectly or via the hall's website. This document defines how FVHMC secures and handles data in line with the GDPR.

#### Collecting data

We will collect personal data from you to run and deliver FVHMC Services. Examples may include:

- Upon receipt of an enquiry
- In reply to a communication from us
- From a customer agreeing to engage in our services
- From interacting with the committee at events providing us with contact details, date of birth, email address, telephone numbers.
- Information that you provide when you communicate with us by any means.
- Whilst FVHMC uses Cookies to track visitor activity to its websites, we do not use cookies to collect personal data.

#### Use of data

FVHMC will use the data that is held to provide our services. In addition we may use the information for one or more of the following purposes:

- To provide information that has been requested from us about our services available or to address enquiries

FVHMC committee have received training with regards to processing data under GDPR and we will continue to ensure that refresher training is provided on an annual basis.

We will only process children's data when relating to specific services. We will only do so with consent of an adult who holds parental responsibility. We will keep the children informed of the use of their data with our

#### Information from third parties.

FVHMC may collect where necessary personal information or data from third parties (e.g. employers). The third party will hold the appropriate permission for this. This information will only be used to facilitate the delivery of the agreed services and for no other purpose.

#### Disclosing data to third parties

FVHMC will only disclose data to third parties for a limited number of reasons:

- Information may be shared with providers of our services to deliver agreed services to clients
- Information as required or permitted by law, or when it is believed that disclosure is necessary to protect our rights, protect an individual's safety or the safety of others, and/or to comply with a judicial proceeding, court order, or other legal process served upon FVHMC
- To protect the risk of fraud
- FVHMC will not sell or pass on information for commercial purposes under any circumstances

# Falfield Village Hall GDPR policy

---

## Profiling

FVHMC undertakes no form of profiling.  
Your personal data is not collected for this purpose.

## Data Retention

FVHMC will retain data securely, ensuring the IT infrastructure is covered by appropriate hardware and software maintenance and support.  
Personal data will not be retained for any longer than is necessary for its defined purpose. We hold a full data retention schedule and reviewed in accordance with the principles of the GDPR.

## Your rights

You have rights within the GDPR and FVHMC is committed to complying with those rights:

1. The right to be informed  
You have a right to be told about the information we hold on you, why we hold it and what we will do with that information. This must be presented in a clear and transparent way.
2. The right of access  
You have a right to ask for a copy of the personal data that we hold about you.
3. The right to rectification  
You can ask us to correct or update any information that we hold about you.
4. The right to erasure  
You can ask us to delete any personal data we hold about you where we no longer have any legal reason to hold it
5. The right to restricted processing  
You can ask us not to continue to process your information although allowing us to still hold it
6. The right to data portability  
Where it is technically feasibly possible, you can ask us to transfer your data to you or another service provider or third party.
7. The right to object  
You can opt out of any marketing communications we might send you. You can also object to us using or holding your personal data if we no longer have legitimate reasons to do so.
8. Rights in relation to automated decision-making and profiling  
Any profiling does not use your personal data.

FVHMC will verify the identity of the person making any of the above requests.

# Falfield Village Hall GDPR policy

---

## Breach

In the event of a breach of personal data FVHMC will comply with the duties set down in the GDPR, informing the Information Commissioners Office if necessary. Where feasible, FVHMC will honour its obligations within 72 hours of becoming aware of the breach.

Should the breach be likely to result in a high risk of adversely affecting individuals' rights and freedoms, FVHMC will also inform those individuals without undue delay.

## Contact us

If you would like to contact us about any of the information in our Privacy Policy please email [chairfvh@yahoo.com](mailto:chairfvh@yahoo.com) or telephone 07917789286.

If you would like to make a complaint about the way, we have acted under our Privacy Policy you can do so by contacting:

Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113 / 01625 545 745

We may need to make changes to our policy from time to time to keep it current and relevant. The latest version of our Privacy Policy will be posted on our website for your reference. We will review the policy as a minimum, on an annual basis.

Date of Policy: 23<sup>rd</sup> June 2020. Next review date June2021.

## Operational Email:

All trustees, staff and volunteers should consider whether an email (both incoming and outgoing) will need to be kept as an official record. If the email needs to be retained it should be saved into the appropriate folder or printed and stored securely.

Emails that contain PERSONAL DATA personal information no longer required for operational use, should be deleted from the personal mailbox and any "deleted items" box.

Where someone not a trustee, employee or contractor needs to be copied into an email e.g. a wider circulation list for an upcoming event, we encourage use of bcc instead of cc, so as to avoid their PERSONAL DATA being shared through forwarding.

## Phone Calls:

Phone calls can lead to unauthorised use or disclosure of personal information and the following precautions should be taken:

- Personal information should not be given out over the telephone unless you have no doubts as to the caller's identity and the information requested is innocuous.
- If you have any doubts, ask the caller to put their enquiry in writing.

# Falfield Village Hall GDPR policy

---

- If you receive a phone call asking for personal information to be checked or confirmed be aware that the call may come from someone impersonating someone with a right of access.

## Laptops & Portable devices:

All laptops and portable devices that hold data containing personal information must be protected with a suitable password which is changed regularly. Where sensitive data or financial information is held an encryption program should be used.

Ensure your laptop is locked (password protected) when left unattended, even for short periods of time.

When travelling in a car, make sure the laptop is out of sight, preferably in the boot.

If you have to leave your laptop in an unattended vehicle at any time, put it in the boot and ensure all doors are locked and any alarm set.

Never leave laptops or portable devices in your vehicle overnight.

Do not leave laptops or portable devices unattended in restaurants or bars, or any other venue.

When travelling on public transport, keep it with you at all times, do not leave it in luggage racks or even on the floor alongside you.

## Data Security & Storage:

Store as little PERSONAL DATA as possible relating to [FVH] on your computer or laptop; only keep those files that are essential. Personal data received on disk or memory stick should be saved to the relevant file on the server or laptop. The disk or memory stick should then be securely returned (if applicable), safely stored or wiped and securely disposed of.

Passwords:

Do not use passwords that are easy to guess. Passwords should contain both upper and lower-case letters and preferably contain some numbers. Ideally passwords should be 6 characters or more in length.

## Protect your Password; Common sense rules are:

- Do not give out your password
- Do not write your password somewhere on your laptop
- Do not keep it written on something stored in the laptop case.

## Data Storage:

Personal data will be stored securely on **DropBox** and will only be accessible to authorised FVH committee members.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. For financial records this will be up to 7 years. For employee records see below. Archival material such as minutes and legal documents will be stored indefinitely. Other correspondence and emails will be disposed of when no longer required or when trustees, staff or volunteers retire.

# Falfield Village Hall GDPR policy

---

All personal data held for the organisation must be non-recoverable from any computer which has been passed on/sold to a third party.

Information Regarding Employees or Former Employees:

**Information regarding an employee or a former employee, will be kept indefinitely.**

If something occurs some years later it might be necessary to refer back to a job application or other document to check what was disclosed earlier, in order that trustees comply with their obligations e.g. regarding employment law, taxation, pensions or insurance.

## **Accident Book:**

This will be checked regularly. Any page which has been completed will be removed, appropriate action taken and the page filed securely.

[FVH] may use general photographs of events with groups of adults at the hall for publicity purposes in accordance with its lawful basis for using PERSONAL DATA. Photos of children must not be used without the written consent of the parent or guardian. However, [FVH] is aware that for some individuals publicising their location could place them or their families

at risk. Consequently at large events at which publicity photos may be taken a notice should be posted at the entrance, or an announcement made, providing opportunity for people to refuse taking part in publicity photographs. At small events the consent of individuals (verbal) should be obtained if their image will be clearly identifiable. Hirers are encouraged to comply with this policy.

## **Data Subject Access Requests:**

We may occasionally need to share data with other agencies such as the local authority, funding bodies and other voluntary agencies in circumstances which are not in furtherance of the management of the charity. The circumstances where the law allows the charity to disclose data (including sensitive data) without the data subject's consent are:

- a) Carrying out a legal duty or as authorised by the Secretary of State Protecting vital interests of a Data Subject or other person e.g. child protection
- b) The Data Subject has already made the information public
- c) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- d) Monitoring for equal opportunities purposes – i.e. race, disability or religion.

We regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. If an agency asks for PERSONAL DATA not in compliance with one of the above e.g. to obtain information about improving a service a consent form will need to be issued to the data subjects asking for their consent to pass their PERSONAL DATA on.

We intend to ensure that personal information is treated lawfully and correctly.

## **Risk Management:**

The consequences of breaching Data Protection can cause harm or distress to service users if their information

## Falfield Village Hall GDPR policy

---

is released to inappropriate people, or they could be denied a service to which they are entitled.

Trustees, staff and volunteers should be aware that they can be personally liable if they use customers' personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of the charity is not damaged through inappropriate or unauthorised access and sharing.

# Falfield Village Hall GDPR policy

---

## FALFIELD VILLAGE HALL COMPLAINTS POLICY

### Introduction

This document aims to help you understand the complaints procedure managed by Village Hall Committee.

### What can you complain about?

If you think we have failed to provide a satisfactory standard of service, please let us know. Your complaint may be about the quality of the facilities, safety of the users, the handling of a particular situation or issue, the handling of personal data, or any other matter. We are committed to equal opportunities and take complaints about discrimination very seriously.

### Who will deal with your complaint?

All complaints should be sent to the **CHAIRPERSON** (designated person) who will address the issue and respond in writing. If you are not happy with the response, then you will be invited to address your complaint to the whole committee, who will listen to your concerns, consider the issues and whether any further actions were appropriate. The committee will then decide on any further actions.

We will take every complaint seriously and we will treat everyone who complains with respect and courtesy.

### When will you hear from us?

We will let you know that we have received your complaint within ten working days. We will write to you or telephone you.

In most cases you will receive a full written response to your complaint within twenty working days. If we cannot give a full reply in this time, we will write to you and let you know why and how we are dealing with your complaint.

If the complaint is complex, we aim to let you have a full reply within twenty-five working days

Any safety concerns that would endanger a Village Hall user would be dealt with immediately notice is received.

# Falfield Village Hall GDPR policy

---

## FALFIELD VILLAGE HALL COMPLAINTS FORM

Please use this form to make your complaint, but if you prefer you can write a letter or telephone.

Name:			
Organisation (if applicable):			
Telephone:		Email:	
Tell us about your complaint, clearly outlining why are you not satisfied?			
What do you want us to do to put things right?			
Have you tried to resolve your complaint before?	YES / NO		
If YES how?			
Any other comments?			

Signed .....

Print Name .....

Organisation (If applicable) ..... Date .....

# Falfield Village Hall GDPR policy

---

## THE FALFIELD VILLAGE HALL POLICY ON PUBLIC INTEREST

### DISCLOSURE (Whistle Blowing Policy)

#### Introduction

The Falfield Village Hall committee is committed to ensuring the highest possible standards of care and the highest possible ethical standards in delivering the services it provides. This policy demonstrates the Committee's commitment to recognise and take action in respect of malpractice, illegal acts or omissions by the Committee members, Hall users and/or volunteers. It is the responsibility of all committee members and volunteers to ensure that if they become aware that the actions of other committee members, Village Hall users or volunteers might compromise this objective, they will be expected to report the matter in the safe knowledge that this matter will be treated seriously and sensitively.

#### Scope of The Policy

The policy applies to all Committee members, Village Hall staff and volunteers.

Situations may arise when it is not appropriate or the "concerned" person feels unable to report incidents to the most "available" committee member.

These may include:

- Malpractice or ill treatment of a child, young person and/or vulnerable adult.
- Suspected fraud.
- A criminal offence is, has or likely to be committed.
- Disregard for legislation e.g. health and safety legislation.
- Damage to the environment.

This list is not exhaustive.

#### Procedure for Reporting

1. All committee members and volunteers who reasonably believe they have concerns as described on the complaints form, are encouraged to discuss them with the person(s) involved.
2. In certain cases, it is recognised that individuals may be reluctant to voice their concerns, particularly if the conduct or action of a colleague is involved. If this situation is applicable, the person is requested to discuss their concerns with the chairperson for the Village Hall committee.
3. The Committee will do its utmost to ensure that a "concerned" person feels able to raise such concerns confidentially and without fear of subsequent action being taken against them.
4. In all cases, the "concerned" person has the right to discuss their concerns with the chairperson for Village Hall committee.
5. All committee members and volunteers are reminded of their obligations with regard to confidentiality and to only discuss concerns on "a need to know basis".

# Falfield Village Hall GDPR policy

---

## Committee Responsibilities

These are as follows:

1. Take the concern seriously
2. Consider the issues fully and sympathetically
3. Recognise that raising a concern can be a difficult experience for some
4. Seek advice where necessary
5. Treat the matter confidentially
6. Reassure the “concerned” person about protection in the event of possible reprisals or victimisation.

The “concerned” person will receive an initial written response within five working days, including details of any further action to be taken, and a full written response within seven working days of the completion of the investigation.

If the “concerned” person is not satisfied with the outcome, the committee recognises the right of individuals to pursue the matter further. The full committee would be called together to consider the concerns. Confidentiality is a priority in such sensitive situations.

Concerns about the committee Chairman – if the concerns were about the Chairman, the deputy Chairman or would consider the complaint.

Signed:

Date:

..... Chairman ..... Village Hall Committee