

SDCS Data Protection Policy

Key details

- Policy prepared by: Lizanne Allen, Committee member
- Approved by committee on: 08/07/2018
- Next review date: 08/07/2019

Introduction

Following changes to data protection regulations on 25th May 2018, Stokesley and District Choral Society (SDCS) needs to have a policy in place which outlines how information about members is collected, stored and used. This policy also needs to cover individuals (such as business contacts) with whom SDCS has a relationship or regularly needs to contact.

Why is this policy important?

This policy ensures that SDCS

- Protects the rights of its members and other relevant individuals as outlined above
- Complies with data protection law and follows good practice
- Protects the group from the risks of a data breach

Roles and Responsibilities

Who and what does this policy apply to?

This applies to *all* those handling data on behalf of SDCS, including choir members, committee members and others within the choir who have responsibilities (e.g. librarian)

It applies to all data that SDCS holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

Roles and responsibilities

Everyone who has access to data as part of SDCS has a responsibility to ensure that they adhere to this policy.

Data controller

The Data Controller for SDCS is Bob Baker. They, together with the committee, are responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

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Data Protection Principles

1. We fairly and lawfully process personal data

SDCS will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name and contact details will be collected when they first join the choir, and will be used to contact the member regarding choir membership administration and activities. Other data may also subsequently be collected in relation to their membership, including on their payment history for subscriptions.
- The name and contact details of committee members and others within the choir with specific responsibilities will be collected when they take up a position, and will be used to contact them regarding choir administration related to their role.

2. We only collect and use personal data for specified and lawful purposes.

When collecting data, SDCS will always explain to the subject why the data is required and what it will be used for.

We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to third parties without the explicit consent of the subject.

3. We ensure any data collected is relevant and not excessive

SDCS will not collect or store more data than the minimum information required for its intended purpose.

E.g. we need to collect telephone numbers from members in order to be able to contact them about choir administration, but data on their marital status or age will *not* be collected, since it is unnecessary and excessive for the purposes of choir administration.

4. We ensure data is accurate and up-to-date

SDCS will ask members and any other relevant individuals to check and update their data on an annual basis.

Any individual will be able to update their data at any point by contacting the Data Controller.

5. We ensure data is not kept longer than necessary

When an individual leaves the choir permanently, they will be given the opportunity to:

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- a) give permission for the choir to retain their contact details for the purpose of reunions.
- b) opt in to mailing lists for event marketing.
- c) have their contact details removed from all records within one month.

In the absence of a response, SDCS will keep data on individuals for no longer than 12 months after its involvement with the individual has stopped, unless there is a legal requirement to keep records.

6. We process data in accordance with individuals' rights

The following requests can be made in writing to the Data Controller:

- Members and other relevant individuals can request to see any data stored on or about them. Any such request will be actioned within one month of the request being made.
- Members and relevant others can request that any inaccurate data held on them is updated. Any such request will be actioned within one month of the request being made.
- Members and relevant others can object to any storage or use of their data that might cause them substantial distress or damage or any automated decisions made based on their data. Any such objection will be considered by the committee, and a decision communicated within 30 days of the request being made.

7. We keep personal data secure

SDCS will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the choir. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data

Member-to-member contact

We only share members' data with other members with the subject's prior consent

As a membership organisation SDCS encourages communication between members.

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To facilitate this:

- Members can request the personal contact data of other members in writing via the Data controller or Membership Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, not financial or health data) and the subject consents to their data being shared with other members in this way.
- When electronically contacting choir members as a group, the “Blind Copy (BCC)” facility will always be used, in order that members’ contact details are not shared without members’ consent
- Consent from committee members will be confirmed in writing with regard to sharing email contact details

The SDCS website

SDCS website does not currently have a log-in facility; its pages are open to choir members and members of the public. The website does not use cookies. If at any time the website is changed such that members need to log in in order to view certain content (e.g. members’ pages) this policy will be reviewed and members informed.