

# CHARNEY HALL AND FIELD TRUST

(Charity No 294765)

## POLICY STATEMENT

Charney Hall and Field Trust (CHAFT) is committed to a policy of protecting the rights and privacy of individuals. CHAFT needs to keep certain data about its trustees, user groups, donors and volunteers to carry out its day-to-day operations, to meet its objectives and to comply with its legal obligations. This information must be collected and handled securely.

**The Data Protection Act 1998 and UK-General Data Protection Regulations (UK-GDPR)** govern the use of information about people (personal data). Personal data can be held on computers, laptops, mobile phones and manual files, and includes email, minutes of meetings, photographs.

CHAFT will remain the data controller for the information held. The trustees and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR.

## AIM

The purpose of this policy is to ensure that everyone handling personal data on behalf of CHAFT is fully aware of the requirements of The Act and GDPR and acts in accordance with its data protection procedures. CHAFT recognises the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

## OPERATION

**The Data Protection Act 1998** contains 8 principles for processing personal data with which CHAFT must comply.

Personal Data:

1. Shall be processed fairly and lawfully and 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 longer than necessary.
6. Shall be processed in accordance with the rights of data subjects under the act.
7. Shall be kept secure by the Data Controller 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 as adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

CHAFT will let people know why we are collection their data, which is for the purpose of managing Charney Bassett Village Hall and Field, its bookings, finance (including fund raising). It is our responsibility to ensure that data is only used for this purpose. Access to personal data will be limited to trustees and volunteers.

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 withing 30 days. Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification and confirmation of address.

CHAFT is the Data Controller under the Act, and is legally responsible for complying with the Act, which means that it determines what purposes personal information held will be used for. The management committee will consider legal requirements and ensure that it is properly implemented, and will through appropriate management, 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
  - i. The right to be informed that processing is undertaken.
  - ii. The right to access to one's personal information.
  - iii. The right to prevent processing in certain circumstances.
  - iv. The right to correct, rectify, block or erase information which is regarded as wrong information.
- f) Take appropriate technical and organisational security measures to safeguard personal information.
- g) Ensure that personal information is not transferred abroad without suitable safeguards.
- h) Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
- i) Set out clear procedures for responding to requests for information.

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

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 CHAFT. The circumstances where the law allows the CHAFT 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. We intend to ensure that personal information is treated lawfully and correctly.

#### **OPERATIONAL ACTIONS**

CHAFT has a duty to ensure that appropriate technical and procedural measures are taken to prevent:

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

All trustees and volunteers must therefore ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether information is held on paper, on a computer or recorded by some other means e.g. tablet or mobile phone.

These measures will include:

1. Physical files containing personal data will be kept in a locked cabinet or secure area.
2. Personal data stored electronically will be password protected, with strong passwords.
3. Computers and devices used to access, and process data will have up to date operational internet security software installed.
4. Only CHAFT trustees and volunteers will have access to personal information held by the charity.
5. Personal data will be stored only for as long as it is needed or required by statute and will be destroyed or deleted appropriately.
6. Hall accident book records will be removed and stored securely.
7. On ceasing to be a Trustee all personal data held for charity business will be deleted.

Ver 2 January 2020

Ver 3 August 2020