



HURSTBOURNE TARRANT COMMUNITY CENTRE

Reg. Charity No: 1156307

Email: susie.hoare@btinternet.com

Tel: 01264 736353

www.hbt.org.uk

Hurstbourne Tarrant Community Centre (HTCC) Charitable Incorporated Organisation (CIO) No. 1156307

General Data Protection Regulations Policy

This document is the General Data Protection Regulations Policy of the Hurstbourne Tarrant Community Centre.

The policy has been issued by the Trustees of the Hurstbourne Tarrant Community Centre to comply with the Data Protection Act (DPA) 1988 and, after 25 May 2018, the European Union General Data Protection Regulations (GDPR) which replace the DPA.

The Trustees will review this policy annually and also as required by any change of circumstances. The Designated Trustee for Data Protection will report to the Trustees regularly on the application of this policy and the associated procedures.

This policy is published on the HTCC web site and paper copies are available on request.

Signed:

Name: Susie Hoare

Chair of the Trustees

Date Adopted: 23rd September 2020

Date for Review: 23rd September, 2021

Designated Trustee for Data Protection: **Andy Watson**

01264 736459

andrew.w.watson@btinternet.com

1. INTRODUCTION

It is intended that this policy be read by the general public to inform them of their rights with regard to their personal data and by Trustees and volunteers to inform them of their responsibilities.

Article 5 of the General Data Protection Regulations (GDPR) requires that personal data is:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f) processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures.

The GDPR provides the following rights for individuals with regard to their personal data:

- a) The right to be informed
- b) The right of access
- c) The right to rectification
- d) The right to erasure
- e) The right to restrict processing
- f) The right to data portability
- g) The right to object
- h) Rights in relation to automated decision making and profiling.

The Trustees of Hurstbourne Tarrant Community Centre (HTCC) respect your privacy and recognise how important it is to you that your personal information remains secure. This policy sets out our rules on data protection and the conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information. The Trustees are responsible for ensuring compliance with the GDPR.

HTCC has registered its use of personal data with the Information Commissioner's Office, reference A8733937.

Any questions or concerns about the operation of this policy should be referred to the Trustees of HTCC. If you consider that the policy has not been followed in respect of personal data about yourself or others you should raise the matter with the Designated Trustee for Data Protection.

2. PERSONAL DATA

HTCC holds personal data relating to the following:

- 1) Trustees
- 2) Volunteers

- 3) Hirers of the Community Centre facilities
- 4) Users of the Community Centre and its facilities
- 5) Members of the public who use or access the Community Centre Car park
- 6) Members of the public who explicitly provided their personal data for one or more of the purposes listed in Section 3
- 7) Providers of services, including but not limited to maintenance, repairs, cleaning, administration, marketing, accounting etc.

HTTC holds the following types of personal data:

- 1) Names and contact details including postal addresses, telephone numbers, email addresses and social media identifiers
- 2) Bank account details including account numbers and sorting codes
- 3) Booking data including date and time, purpose of booking, numbers of attendees and age groups
- 4) Health and Safety incident records
- 5) Closed Circuit Television (CCTV) video and imagery data identifying members of the public and their vehicles, including registration numbers

3. DATA COLLECTION

Personal data is collected directly by HTTC when members of the public

- 1) Provide contact information for the purposes of being informed about HTCC activities, operations and fund raising
- 2) Inquire about or make a booking for HTCC facilities
- 3) Provide regular or one-off donations to HTCC
- 4) Provide a service to HTCC
- 5) Use or access the HTCC car park

Personal data shall only be collected through one of the methods listed above.

Explicit authorisation must be obtained from the person providing the data to the collection of their personal data under categories one to four above.

Collection and use of CCTV data shall be notified to users and accessors of the HTCC car park by means of a publically displayed notice.

Personal data shall not be sold to third party organisations nor shared with third parties for their benefit.

Personal data may be shared with competent authorities (as defined by UK legislation and the Information Commissioner's Office) for the purposes of law enforcement, the prevention of crime and the prevention of anti-social behaviour.

4. DATA PROCESSING

HTCC processes personal data for the following purposes:

- 1) Marketing of Community Centre facilities available for hire
- 2) Marketing of activities taking place at the Community Centre
- 3) Informing the public about the operations of Community Centre
- 4) Raising funds for the Community Centre or its facilities
- 5) Hiring the Community Centre or its facilities

- 6) Analysing the usage and performance of the Community Centre or its facilities
- 7) Contracting for the provision of services required to manage and operate the Community Centre or its facilities
- 8) Law enforcement, the prevention of crime and the prevention of anti-social behaviour

Personal data shall only be processed for one or more of purposes listed above.

Personal data shall not be subject to automated decision making or profiling.

Explicit authorisation must be obtained from the person providing the data to carry out data processing except where that data is used for law enforcement, the prevention of crime and the prevention of anti-social behaviour.

5. DATA MANAGEMENT

HTCC shall respond without delay, and within at most one month, to a request from a member of the public to provide a copy all personal data held by HTCC – i.e. a *Subject Access Request*.

HTCC shall, on request:

- 1) modify or delete personal data
- 2) modify the purposes for which personal data will be processed

Requests shall be carried out without delay, and within at most one month.

Personal data shall be deleted when no longer required for the purposes listed in Section 4 above.

6. DATA SECURITY

Personal data shall be held securely. This means:

- 1) Paper records will be stored securely and with access controlled by Trustees or volunteers who have signed the GDPR Trustee or Volunteer Authorisation form
- 2) Digital records will be held on one or more of:
 - a. a personal computer (PC, tablet etc.) which is owned and controlled by an authorised Trustee or volunteer
 - b. a cloud based storage account which is controlled by one or more Trustees. Cloud storage must be provided by Apple, Dropbox, Google or Microsoft who comply with EU regulations or EU-US Shield provisions
 - c. a secure CCTV recording device which is controlled by one or more Trustees

Access to HTCC personal data must be protected by a strong password or equivalent mechanism (e.g. fingerprint recognition). Only authorised Trustees or

volunteers shall know the strong password(s) which must be protected from discovery and not shared.

Backups of digital records shall be protected in the same manner as the primary records. Removable digital media shall be stored securely.

Printouts of digital records shall be treated as paper records and stored securely.

Paper records and printouts shall be shredded before disposal.

Personal data in any form shall not be shared with or disclosed to anyone other than authorised Trustees or volunteers or competent authorities for purposes of law enforcement, the prevention of crime and the prevention of anti-social behaviour.

Personal data shall not be disclosed when communicating with members of the public for any of the purposes listed in Section 4. This means that personal identifiers, such as email addresses shall not be disclosed in bulk communications, i.e. BCC addressing must be used.

7. IMPLEMENTATION

The implementation of this policy is defined by the procedures and associated record keeping:

- 1) Registration of Personal Data procedure / form
- 2) Subject Access Request procedure / form
- 3) Personal Data Change procedure / form
- 4) Data Processing procedure / record
- 5) Trustee and Volunteer Authorisation procedure / form
- 6) Data Breach Investigation procedure / record