

## **Hyde War Memorial Village Hall Data Protection Policy**

### ***Principles:***

The Trustees of the Hall will comply with the requirements of the Data Protection Act, 2018, and all other relevant information and data legislation, by accepting and applying the following principles across all the activities they undertake in relation to the Hall:

We will ensure that information we have is:

- *used fairly, lawfully and transparently*
- *used for specified, explicit purposes*
- *used in a way that is adequate, relevant and limited to only what is necessary*
- *accurate and, where necessary, kept up to date*
- *kept for no longer than is necessary*
- *handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage*

### ***Scope:***

This policy relates to all information, in whatever format received, kept or held, by all committees, organising groups, and individuals who have access to information for any purpose which relates to the Hall.

### ***Responsibility for Data Protection:***

All individuals acting on behalf of the Hall are individually responsible for their use of personal data, and the Hall has appointed a Data Protection Officer to oversee the implementation of this policy, to brief colleagues on the requirements of data protection, and to carry out audits to review our compliance with current legislation.

Data Protection Officer: Nigel Owen

### ***Data Audits:***

A review or audit of our practice in relation to data and information will be carried out at least once every three years, and also as necessary when practice changes or issues arise. In 2023 we undertook a data audit to understand who holds information, where and in what form. This audit raised issues over consent, data sharing, and data retention, all of which need further work to ensure that good practice is followed across all of the Hall's procedures.

### ***Consent:***

When we hold personal data, we need to ensure that we have the consent of individuals to hold and retain that information. This requires that, for example, all hirers of the Hall have agreed to share their contact information with the Hall, and appropriate persons who may need access to this.

### ***Data Sharing:***

The Hall Trustees will appoint people to hold appropriate data, and require that data is held securely (whether hard copy or online), and that data which is no longer required should be destroyed. Data may be shared between people working on behalf of the Hall where it is deemed necessary and appropriate. Data is to be used for Hall purposes only, and is not to be shared for other purposes.

***Data Retention:***

All individuals keeping information on behalf of the Hall are responsible for the deletion and destruction of all personal data which is no longer of use. It is recommended that individuals minimise the amount of information they hold, and regularly destroy notes, and delete files and contact information, which is no longer relevant or current.

***Sharing our personal information:***

People who volunteer to take a role in the organising of activities for the Hall, or otherwise assist with the running and management of the Hall, need to consent to their personal contact information being shared with colleagues working with them, including the Trustees of the Hall.

Individuals working for the Hall may also choose to share their personal contact information with the wider public [eg: as the promotor of specific events, or as contact to report issues at the Hall], and under these circumstances, explicit prior agreement must be given by the individuals whose data is being shared.

***Review of this Policy:***

This policy was ratified by a meeting of the Hall Trustees on **11<sup>th</sup> January, 2024** and will be reviewed by the Hall Trustees within three years.

Nigel Owen,

January 2024