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**Data Protection policy**

Key details

* Policy prepared by: Beryl Whincup
* Approved by Board/committee on: 16/04/2018
* Next review date: 31/03/2020

## Introduction: In order to operate, Stafford Choral Society needs to gather, store and use certain forms of information about individuals.

These can include members, employees, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people the group has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet Stafford Choral Society data protection standards and comply with the General Data Protection Regulations (GDPR).

## Why is this policy important?

This policy ensures that Stafford Choral Society Protects the rights of our members, volunteers and supporters

* Complies with data protection law and follows good practice
* Protect the group from the risks of a data breach

# Roles and responsibilities

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# Stafford Choral Society is the Data Controller and will determine what data is collected, retained and how it is used. The **Data Protection Officer** (DPO) for Stafford Choral Society is Gwyneth Pierpoint (Membership Secretary). She, together with the committee is responsible for the secure and fair retention and use of data by Stafford Choral Society. Any questions relating to data retention or use of data should be directed to the DPO.

# The policy applies to *all* those handling data on behalf of Stafford Choral Society e.g.:

* Committee members
* Employees and volunteers
* Members
* Contractors/3rd-party suppliers

It applies to all data that Stafford Choral Society holds relating to individuals, in order for Stafford Choral Society to communicate with them about and promote group activities. including:

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

# Data protection principles

Stafford Choral Society 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 (address, telephone number and email address) will be collected when they first join the group, and will be used to contact the member regarding group membership administration and activities. Other data may also subsequently be collected in relation to their membership, including their payment history for ‘subs’.
* The name and contact details of volunteers, employees and contractors will be collected when they take up a position, and will be used to contact them regarding group administration related to their role.  
    
  Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).
* An individual’s name and contact details will be collected when they make a booking for an event. This will be used to contact them about their booking and to allow them entry to the event.
* An individual’s name, contact details and other details may be collected at any time (including when booking tickets or at an event), with their consent, in order for Stafford Choral Society to communicate with them about and promote group activities.

When collecting data, Stafford Choral Society will always provide a clear explanation of why the data is required and what it will be used for.

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

Stafford Choral Society will ask members, volunteers and staff 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 Membership Secretary.

Stafford Choral Society will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).

The storage and intended use of data will be reviewed in line with Stafford Choral Society’s data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

Stafford Choral Society will ensure that data held by us is kept secure.

* Electronically-held data will be held within a password-protected and secure environment
* 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 group.

# Individual Rights

* *Right to be informed:* whenever Stafford Choral Society collects data it will explain why it is being collected and how it will be used.
* *Right of access:* individuals can request to see the data Stafford Choral Society holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
* *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. Stafford Choral Society will request that members, staff and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
* *Right to object:* individuals can object to their data being used for a particular purpose.. Where Stafford Choral Society receives a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
* *Right to erasure:* individuals can request for all data held on them to be deleted. Stafford Choral Society’s data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected unless there is a legal requirement to keep the data.
* We only share members’ data with other members with the subject’s consent

Stafford Choral Society would like to use membership contact details for marketing purposes. This includes contacting them to promote performances, updating them about group news, fundraising and other group activities.

New members will be asked to show their positive and active consent to receive these communications (e.g. a ‘tick box’)

**DATA REVIEW**: A regular review of all data will take place to establish if Stafford Choral Society still has good reason to keep and use the data held at the time of the review.

As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review took place on 16th April 2018

## Data to be reviewed

* Data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
* Physical data stored at the homes of committee members

## Who the review will be conducted by: The review will be conducted by the Data Protection Officer with other committee members to be decided on at the time of the review.

## How unnecessary data will be deleted eg if a member has left Stafford Choral Society or no longer wishes to be contacted for marketing purposes etc

* Physical data will be destroyed safely and securely, including shredding.
* All reasonable and practical efforts will be made to remove data stored digitally.
* Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

Statutory Requirements

Date stored by Stafford Choral Society may be retained based in statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

* Gift Aid declarations records
* Details of payments made and received (e.g. in bank statements and accounting records)
* Trustee meeting minutes
* Contracts and agreements with suppliers/customers
* Insurance details
* Tax and employment records

# Other data retention procedures

## Member data

* When a member leaves Stafford Choral Society and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data

## Volunteer and freelancer data

* When a volunteer or freelancer stops working with Stafford Choral Society and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data
* Unless consent has been given data will be removed from all email mailing lists
* All other data will be stored safely and securely and reviewed as part of the next two year review