

## **POLICY AND PROCEDURES**

### **General Data Protection Regulation (GDPR) detailed procedures for The Davis Hall, West Camel, Somerset BA22 7QX**

(The Davis Hall)

Based on the Information Commissioner's Office (ICO) Twelve Steps Guidance document – our compliance procedures are as follows:

#### **1. Awareness**

Decision makers and key people in the organisation are the Trustees, who are recorded on the Minutes of Meetings, The Charity Commission Records and on the Davis Hall Notice Board for the purposes of managing the hall.

#### **2. Information held**

Anyone who wishes to be included on an email mailing list will provide their email address to the Secretary, The Davis Hall, West Camel. This list is only used by the Trustees to send emails relating to Davis Hall management, fundraising and events.

Should anyone wish to contact each other by telephone, they will need to share the information personally and directly, and not via the Trustees.

#### Social Media

Should events be publicised by Trustees on the personal social media sites of those involved in village hall events (Facebook, Twitter and Linked-In) this will be under the general rules of the media sites. This is a personal choice. There is no Davis Hall, West Camel social media site.

Trustees may from time to time take photographs of events for marketing purposes. People at the event will be made aware that this is possible and can ask not to be included.

#### **3. Communicating privacy information**

When someone asks to be added to the Davis Hall email list, we will do this and they will be deemed to have consented to and be aware that we hold their name and e-mail address for the purposes of managing, advertising and fundraising for the Davis Hall. Their details will not be processed or shared with anyone without their express permission. They can unsubscribe at any time and their information will be deleted. Only current records will be held apart from where legally required for the management of the Davis Hall. (i.e. Accident Records)

#### **4. Individuals' rights**

The GDPR includes the following rights for individuals:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object
- the right not to be subject to automated decision-making including profiling.

We cannot see any reason why these cannot be adhered to with our procedures outlined above.

## **5. Subject access requests**

Should someone ask for the data we hold on them, the Secretary would be able to show them any information that is on our list.

Before we provide the data, we will ask them to answer a relevant security question, to ensure we are providing information to the correct person. Most of our clients are personally known to Trustees for identification purposes but if this were not the case two forms of ID would be required (e.g. Utility bill with address/Driving Licence/Passport). Should any authority (Police or Social Services) require information ID would be checked before any information was divulged.

## **6. Lawful basis for processing personal data**

Data held for Trustees and clients may include name, address, e-mail address and telephone number only; The Davis Hall mailing list only holds e-mail addresses; there is no processing of data.

## **7. Consent**

Before 25<sup>th</sup> May 2018, we will email everyone who is currently on the email list, to ask them to consent to continue to be on the list. Anyone who does not reply by the deadline will be removed from the list and will need to re-subscribe should they wish to start receiving the emails again.

## **8. Children**

There are currently no subscribers under 16. Should this change in the future, the permission of a Parent or Guardian will be sought before adding the name to the list.

## **9. Data breaches**

Should our email be hacked, we would need to send a message to every email address held on our list to explain that this may have happened.

## **10. Data Protection by Design and Data Protection Impact Assessments**

Records are maintained on a computer with password protection in a private house. There is no processing of entries minimising any likelihood of breaches.

CCTV records are handled according to the guidelines set out by the ICO. CCTV cameras cover the car park, entrances and surrounds of the hall and the tennis court on the neighbouring sports field. They do not infringe on neighbouring private property. CCTV is maintained for the detection and prevention of crime only.

## **11. Data Protection Officers**

For the time being, Mary G Gordon will be DPO for The Davis Hall West Camel, the procedures in this document having been agreed by the Trustees at a meeting on 6<sup>th</sup> April 2018 at The Davis Hall, West Camel.

## **12. International**

N/A