

Data Protection Policy



Policy author/holder: Chairperson
Date approved: 26 February 2024
Approved by: Committee
Reviewed/effective date: February 2024
Next review due: February 2027

1 Purpose

The purpose of this policy is to outline how Frenchay Village Hall will ensure compliance with the General Data Protection Regulation ("UK GDPR") and Data Protection Act 2018 ("DPA").

2 Policy statement

Frenchay Village Hall is committed to transparent, lawful, fair, and proportionate processing of personal data. This includes all personal data that we process about customers, volunteers or those who work or interact with us.

As a processor and controller of personal data, Frenchay Village Hall is registered with the Information Commissioners Office (ICO) in accordance with the legislation.

Any breach of this policy by any person connected to Frenchay Village Hall may result in further action.

3 Scope and definitions

This policy applies to Frenchay Village Hall.

This policy applies to all processing of personal data carried out by Frenchay Village Hall in relation to the personal data of our customers, volunteers, suppliers and other third parties, including processing carried out by joint controllers, contractors, and processors.

All volunteers must read, understand, and comply with this policy, along with our additional Social Media Policy.

4 Information covered by Data Protection Legislation

The UK GDPR definition of “personal data” includes any information relating to an identified or identifiable natural living person.

The legislation includes pseudonymised personal data, however, anonymised data is not regulated by the UK GDPR, providing the anonymisation has not been done in a reversible way.

Some personal data is more sensitive and is given greater protection under the regulations.

This information relates to:

- Race or ethnic origin
- Political opinion
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric ID data
- Health data
- Sexual life and/or sexual orientation
- Criminal data (convictions and offences)
- This data is known as special category data

5 Data Protection legislative requirements

The Data Protection legislation lists 6 principles that organisations must comply with. They require that personal data is:

- Processed fairly, lawfully and in a transparent manner.
- Used only for limited, and specified purposes and not used or disclosed in any way which is incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and where necessary up to date.
- Not kept for longer than is needed.
- Kept safe and secure.

In addition, the accountability principle requires that we evidence our compliance with the above principles.

Failure to comply with the requirements of the UK GDPR and the Data Protection Act 2018 may result in:

- Criminal and civil action
- Enforcement action by the ICO
- Fines and damages
- Personal accountability and liability
- An intervention by the Charity Commission
- Loss of confidence in the integrity of our systems and procedures
- Damage to reputation

6 Frenchay Village Hall compliance with legislation

In accordance with the accountability principle as set out in the legislation, we ensure that appropriate and effective measures are put in place to meet the legislation:

- Privacy notices - we have a published privacy notice on our website and provide timely notices where this is required. We track any changes to our privacy notices.
- Training - as a small organisation we don't require volunteers to undertake formal training on data protection. However, all volunteers are asked to confirm any attendance at or completion of external training which they may undertake, and which is relevant to their role.
- Breaches - we consider personal data breach incidents and volunteers are required to report all data breaches immediately to the chairperson and the data controller by email at frenchayvillagehall@gmail.com
- Information rights - the committee are responsible for responding to individual rights requests and processing the requests.
- Policies and procedures - to support volunteers in complying with the legislation we produce a separate social media policy and ask all volunteers to read the ICO's beginners guide. <https://ico.org.uk/for-organisations/advice-for-small-organisations/your-beginner-s-guide-to-data-protection/>

7 Version control

Version ref	Date of change	By whom	Reason
1	26/02/24	Committee	Approval
2	11/04/26	Chairperson	Website update

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