

# Honley Ladies Choir

## Data Protection Policy

### ***Introduction***

Honley Ladies Choir (HLC) needs to gather and use certain information about its members. This policy describes how this personal data must be collected, handled and stored to meet the choir's data protection standards and to comply with the law.

### ***Why this policy exists***

This data protection policy ensures that HLC

- Complies with data protection laws and follows good practice
- Protects the rights of members and the committee
- Is open about how it stores and processes member's data
- Protects itself from the risk of a data breach

### ***Data Protection law***

The Data Protection Act 1998 describes how organizations including HLC must collect, handle and store personal information, regardless whether it is stored on paper or electronically. New European regulation of 2016 (General Data Protection Regulation, (GDPR),) contains all requirements and protection of the 1998 Act but primarily gives control to individuals over their personal data and free movement of that data within the EU. This GDPR was implemented in May 2018. The Data Protection Act states that personal data must

- Be processed fairly and lawfully
- Be obtained for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and up to date
- Not be held any longer than is necessary
- Processed in accordance with the rights of data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate protection.

### ***Scope of the Policy***

The Policy applies to all HLC members and the committee. It applies to all data HLC holds relating to identifiable individuals which includes

- Names of members
- Postal addresses
- Email addresses
- Telephone numbers
- Records of attendance
- When members joined the choir
- Social media and HLC web site

### ***Responsibility, accountability and consent***

It is the responsibility of HLC to gather and process information of all members. It does this by providing an application form for all required information for new members which is kept in paper form and transferred electronically onto a membership data base. Current members have had their information stored and processed this way. When information is collected, all members will be informed about the extent of privacy and how long the information will be retained and that this information is for the sole use of HLC business. It will be the responsibility of a designated committee member to monitor and comply with processing activity.

On application, members sign their agreement/consent for their personal data to be used for HLC purposes, their right to revoke consent at anytime, right to know how data is processed and right to erase under certain circumstances i.e. if they leave choir and the right to complain if not satisfied with the process. In line with the GDPR in 2018, HLC requested all members to sign and updated consent to personal information being used. Members will be requested to inform HLC annually if personal information changes.

### ***Storing Data***

Membership information will be stored on a membership data base monitored and accessible by the membership secretary on a monthly basis. Records of attendance, apologies and absences are taken each rehearsal and shared with the Musical Director on a monthly basis and kept on paper files. All e-mail addresses are stored on a Google/Gmail contact list and accessible only by the chair and secretary. This will be updated as necessary. The website will only give HLC activity as necessary with photographs of choir members with their consent.

Members will not have direct access to HLC member's information and only those personnel authorized to do so.

***Archiving/removal of data***

To ensure that personal data is not stored longer than is necessary, HLC require any member who requests removal to do so in writing and that data will be removed within a reasonable timescale from HLC receiving the letter. Member's data to be removed if members leave will be erased within a reasonable timescale.

***Sharing of information***

HLC shares information by its Face book page. Personal information except bank details will be shared with committee members as necessary and only for HLC business.

Privacy of members e-mail addresses will be protected when HLC activity is circulated by 'blind carbon copy' (BCC) on Googlemail.

***Breach of security***

In the event of a breach in data security or unlawful destruction, loss or unauthorized disclosure, HLC will assess the risk of member's rights and freedoms, proceeding as necessary.

**Policy accepted by Honley Ladies Choir on 3 September 2018 and will be updated as necessary.**