

Hanham Community Centre

A Charitable Incorporated Organisation - Charity No: 1152575

Data Protection and Privacy Policy

May 2018

Dated: 21st May 2018

Issue: 1.0

Prepared by: K M Lawrence

This Policy was adopted by the Board of Trustees

AMMENDMENTS

Version	Date	Author	Comments
0.1A	Apr 18	K M Lawrence	Initial Draft
1.0	May 18	K M Lawrence	Issued Document

HCC Data Protection and Privacy Policy

This notice sets out how we will use your personal data, and your rights. It is made under Articles 13 and/or 14 of the General Data Protection Regulation (GDPR).

1. Your data

Members:

We will process the following personal data when you become a member:

- Full Name
- Address and Postcode
- Telephone Number(s)
- Email address
- Section Membership
- DBS Certificates (where appropriate)
- Financial Information – Direct debt details

Employees:

When you apply to, or join, the HCC or BATS team we will, in addition, process the following data:

- Employment History, CV, Application form
- National Insurance Number
- Marital Status
- References
- Equal Opps Information – Gender, DOB, Special facilities, Cultural background
- Financial information – relating to pay and tax

Venue Hirer:

In addition to the information retained for members, we will also process the following information:

- Organisation representing
- Venue hire details (room, usage, times, guest numbers)
- Charges paid and to be paid
- Confirmation of acceptance of HCC terms and conditions

2. Purpose

The purposes for which we are processing your personal data are:

- to manage centre membership
- to (in future) enable the creation of online membership management
- to enable the Trustees and Centre staff to contact members and staff (as needed)
- to manage recruitment and interviewing
- to manage room usage and bookings
- to undertake statistical analysis of membership and user patterns
- to communicate information which may be of interest to you
- to seek feedback on venue usage

3. Legal basis of processing

The legal basis for processing your personal data is:

- Contractual: it is necessary for the performance of a contract to which you are a party - an employment contract, Hire Contract
- Contractual: it is necessary in order to take steps at your request prior to entering into a contract for employment
- Legal obligation: it is necessary to comply with a legal obligation placed on us as the data controller – in support of reporting on equality of opportunity; and onboarding processes
- Contractual: to record, manage and maintain records of members and associate members of the organisation

HCC does not retain any sensitive personal information.

4. Recipients

Your personal data may be shared by us with:

- Charity Commission
- HMRC
- Suppliers of web services (Accounts, membership, Room bookings etc)
- HCC Trustees (and staff) (e.g. for interview panels)
- Disclosure and Barring Service
- HCC pension provider
- Other for legal and operations purposes

As your personal data will be stored on our IT infrastructure (and on-line membership management service) it will also be shared with our data processors who provide email and document management and storage services to us. Your data will also be retained in paper format (applications, Hire agreements, membership forms).

5. Retention

Your personal data will be kept by us for the following durations:

Membership	1 year after expiry of current membership
Trustees	5 years after ceasing to be Trustee
Job Application	Records and associated files (including CVs, letters, emails, comment and feedback) will be retained for 6 years.
Hire Forms	Retained for 3 years beyond the financial year the hire was held in

6. Automated decision making

Your personal data will not be subject to automated decision making.

7. Your rights

- You have the right to request information about how your personal data is processed, and to request a copy of that personal data.
- You have the right to request a copy of any personal data you have provided.
- You have the right to request that any inaccuracies in your personal data are rectified without delay.
- You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.
- You have the right to request that your personal data is erased if there is no longer a justification for it to be processed (though this may terminate any membership or Hire agreement).
- You have the right to object to the processing of your personal data where it is processed for direct marketing purposes.
 - your data is not processed for direct marketing purposes

HCC charges a fee of £10 for a Data Subject Access Request.

8. International transfers

As your personal data may be stored through our web services providers it may be transferred and stored securely outside the European Economic Area. Where that is the case it will be subject to equivalent legal protection.

9. Sections

As a legal part of the HCC, sections are under direction and mandate to adhere to all HCC policies and guidance. HCC sections may create their own (specific) guidance in this area but should reference this overarching HCC policy. Any such guidance must be consistent with this policy.

10. Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Charity Trustees who are the information controller for all charity information; and/or to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113

casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

11. Contact details

Hanham Community Centre CIO is the data controller for your personal data held and processed by HCC.

- You can contact HCC by email: admin@hanhamcentre.org.
- The contact details for HCC Data Protection Officer (DPO) are:
Kevin Lawrence (DPO)
Hanham Community Centre, 118-124 High St, Hanham, Bristol. BS15 3EJ