

The Derbyshire Singers' Data Protection Policy

Overview

Key details

- Policy prepared by: D Jackson, C Baker, J Jackson.
- Approved by committee on: 04.06.18 All agreed
- Reviewed by committee on: 01.07.19. No revisions made
- Next review date: June 2021 and every two years thereafter

Introduction

In order to operate, The Derbyshire Singers 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 will be collected, stored and used in order to meet The Derbyshire Singers' data protection standards and comply with the law.

Why is this policy important?

This policy ensures that The Derbyshire Singers:

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protects the group from the risks of a data breach

Roles and responsibilities

Who and what does this policy apply to?

This applies to all those handling data on behalf of The Derbyshire Singers, e.g.:

- Committee members
- Members
- Employees and volunteers
- Contractors/third-party suppliers

It applies to all data that The Derbyshire Singers holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial information/ passport details / photos /videos)

Everyone who has access to data as part of The Derbyshire Singers has a responsibility to ensure that they adhere to this policy.

Data controller

The Data Controller for The Derbyshire Singers is Chris Baker, Secretary. She, together with the trustees and committee, is responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

Data protection principles

1. We fairly and lawfully process personal data

The Derbyshire Singers will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name, voice and contact details 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 of subscriptions.
- The name and contact details of volunteers, committee members, 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 may 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 The Derbyshire Singers to communicate with them about group activities, and/or for Direct Marketing. See 'Direct Marketing' below.

2. We only collect and use personal data for specified and lawful purposes.

When collecting data, The Derbyshire Singers will always explain to the subject why the data is required and what it will be used for, e.g. *"Please enter your email address in the form below. We need this so that we can send you email updates for group administration including about rehearsal and concert schedules, subscription payments and other business."*

We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to 3rd parties without the explicit consent of the subject.

3. We ensure any data collected is relevant and not excessive

The Derbyshire Singers will not collect or store more data than the minimum information required for its intended purpose.

4. We ensure data is accurate and up-to-date

The Derbyshire Singers 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 (including deletion, if wished) at any point by contacting the Data Controller.

5. We ensure data is not kept longer than necessary

The Derbyshire Singers will keep data on individuals for no longer than 12 months after our involvement with the individual has stopped, unless there is a legal requirement to keep records or we have their permission to keep in contact.

6. We process data in accordance with individuals' rights

The following requests can be made in writing to the Data Controller:

- Members, volunteers and supporters can request to see any data stored on them. Any such request will be actioned within 7 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 7 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 7 days of the request being made.
- Members and supporters can object to any storage or use of their data that might cause them substantial distress or damage, or to any automated decisions made based on their data. The committee will consider any such objection and a decision will be communicated within 30 days of the request being made.

7. We keep personal data secure

The Derbyshire Singers will ensure that data held by us is kept in a secure manner.

- Electronically-held data will be held within a password-protected and secure environment
- If appropriate, passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard
- If appropriate, any keys for locks securing physical data files should be collected by the Data Controller from any individual with access if they leave their role/position.
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the choir. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data.

8. Transfer to countries outside the EEA

The Derbyshire Singers will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual (e.g. USA).

Member-to-member contact

Whilst The Derbyshire Singers encourages communication between members, **we only share members' contact data with other members with the subject's prior consent.** Requests for such information should be made to the Data Controller.

Direct Marketing

The Derbyshire Singers will occasionally collect data from supporters (with their consent) for marketing purposes. This includes contacting them to promote concerts, updating them about group news, fundraising and other group activities.

Any time data is collected for this purpose, we will provide:

- A clear and specific explanation of what the data will be used for (e.g. *'Tick this box if you would like The Derbyshire Singers to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved'*)
- A method for users to show their active consent to receive these communications (e.g. a 'tick box')

Data collected will only ever be used *in the way described and consented to* (e.g. we will not use email data in order to market 3rd-party products unless this has been explicitly consented to).

Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' option in an email). Opt-out requests such as this will be processed within 7 days.

Cookies on the The Derbyshire Singers' website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

The Derbyshire Singers uses cookies on our website (www.derbyshiresingers.org) in order to monitor and record activity. This allows us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

A pop-up box on the website (www.derbyshiresingers.org) will activate each new time a user visits the website. This will allow them to click to consent (or not) to continuing with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent).

The website also includes a link to our Data Protection Policy.