

HIGHWORTH CHORAL SOCIETY

Data Protection Policy

INTRODUCTION

Highworth Choral Society (the Choir) is a non-auditioned SATB choir with around 60 volunteer members. It is registered with the Charities Commission; Registration Number 1096246.

The Choir is governed by 3 trustees and managed by a Committee elected annually by its membership. The Committee consists of the officers of Chairman, Treasurer, Secretary plus a number of other members not exceeding a total of 9. In addition, the Musical Director and Accompanist are honorary members of the committee providing musical input where required.

The Choir needs to collect and use essential information regarding its members and others for administrative purposes and to carry out its musical activities including rehearsals, concerts and ad hoc events. The Choir recognises its duties under the 2018 General Data Protection Regulation GDPR to safeguard this information whether on a database, paper or other means.

Data Controller

The Committee is the Data Controller (DC) under the Act and decides what and for what purpose personal information is obtained and held. The Secretary is responsible for the day to-day management of the Choir's membership database.

For publicity and information to members the Choir has a website. There is also a members' area on this site accessed by means of a username and password made available to its members. Items for inclusion on the site are normally approved by the Committee.

Lawful, Fair and Transparent processing

To ensure its processing of data is lawful, fair and transparent, Highworth Choral Society shall maintain a Register of Systems.

The Register of Systems shall be reviewed at least annually.

Disclosure

Rarely the Choir may need to share data with other agencies including the Local Authority and funding bodies.

Normally Choir members and others will be informed why and how and with whom their information will be shared. Exceptions to this are when information is required by law, to protect the individual's interest, equal opportunities monitoring and if the individual is not fit to provide their signature.

The Choir recognises the importance of ensuring that personal information is treated lawfully and correctly, and is treated confidentially.

The Choir protects its information in accordance with the GDPR. It ensures that it is needed and fit for purpose, specific and lawfully used, adequate and relevant and not excessive. It will not keep personal information for longer than is necessary.

The DC takes appropriate measures to ensure the security of information and that it is not subject to unlawful or unauthorised processing or loss or destruction.

The Choir ensures the good quality and fair collection and use of information. It will ensure its fitness for purpose and only collect and process the information needed to fulfil its musical activities and any legal requirements.

The Choir recognises its duties under the Act to protect the rights of its members and potential members. This includes informing them, allowing access to personal information and under some circumstances preventing the processing of personal information. Also to correct, rectify block or erase wrong or incorrect information.

The Choir ensures that security is in place to safeguard personal information.

The Choir treats individuals justly and fairly in accordance with its Equality Policy.

Purposes

The choir collects person information from its members for:

1. Communications to members regarding rehearsals and concerts and other news items
2. HMRC for tax purposes (gift aid claims need to reference individuals relating to the claim).

We also hold bank details for committee members for the purpose of making payments to bank accounts (e.g. to reimburse expenses or overpayments). (Information is provided by members and held securely on online banking systems).

Data processing

All data processed by Highworth Choral Society must be done on one of the following lawful basis: consent, contract, legal obligation, vital interests, public task or legitimate interests.

Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Highworth Choral Society's systems.

Data storage

Information and records of members and others is stored securely and only accessible to others on a need to know basis.

Personal information will only be stored for as long as it is needed by the Choir or required by law.

Information no longer required will be disposed of appropriately including the permanent destruction of paper records and destruction of electronically held data when disposing of computers or discs.

Data access and accuracy

All members and others serving the Choir have the right of access to the information the Choir holds on them. Any requests made to the Choir shall be dealt with in a timely manner.

The choir shall take reasonable steps to ensure personal data is accurate and kept up to date. Members are asked to inform the Secretary of any changes.

The Choir has a Data Protection Officer, normally the secretary of the committee, responsible for ensuring compliance with the GDPR. In practice this is an Executive Committee role under the guidance of the Choir Chairman.

Data Protection will be a regular agenda item at Committee meetings to address any queries.

Data Archiving / Removal

All members' data will be stored securely and regularly backed up. It will be permanently deleted when a member leaves the choir.

The archiving policy shall consider what data should/must be retained, for how long, and why.

Arrangements

1. The Choir collects, uses and stores only the limited personal information on individuals essential for recruiting and retaining its members and also its Musical Director and accompanist. It does not request information on for example ethnicity and disability and also on other matters covered in its equality policy. However if such information is volunteered it is not shared without the consent of the individual concerned.
2. Application for membership is by attending a rehearsal night where the person's details will be entered on a form. The chairman or introducing member will introduce the person to the Musical Director who will agree the relevant voice part for each person.
3. Complete lists of members are available only to the Choir Committee members.
4. All Committee members understand the principles of good data protection practice and their duties under the GDPR: they understand and adhere to the requirement for confidentiality regarding Choir matters and records.
5. Certain personal information regarding for example the Musical Director and accompanist is maintained by the treasurer.
6. With written consent of the individuals, lists of members in each of the sections are passed to section leaders usually electronically.
7. The treasurer holds the information required by the Charities Commission.
8. Except in exceptional circumstances the Choir anticipates no need to pass on personal information on its members, Musical Director or accompanist. In the exceptional case written consent of the individual would be requested.
9. The choir holds such data as is required for HMRC purposes in order to claim gift aid relating to individual subscriptions and donations as appropriate to each members contributions where a gift aid form has been provided.
10. The Data Protection policy will be posted on the Choir website. Electronic copies are held by the Committee and hard copies made available on request.