



PELHAM VILLAGE HALL

PENALLT, MONMOUTH, MONMOUTHSHIRE, NP25 4AH

Registered Charity 524369

Data Protection Policy

Revision date: March 2018

The General Data Protection Regulations (GDPR) require organisations holding identifiable personal data to comply with a number of principles to protect individuals. The main relevant points are:

- Data must be collected for fair and lawful processing. The purpose of the data collection must be identified and the data must not be used for other purposes
- The holder must ensure privacy of personal data, and take measures to ensure no unauthorised processing can take place (for example, by passing it on to others)
- The data must be adequate for the purpose, accurate, limited to the data necessary for the stated purposes, and kept only as long as it is relevant for this purpose

In our context, individuals must actively consent to the data being held and must be aware of the purposes for which they are held. They must also understand how to withdraw consent. It is also a requirement of the GDPR that organisations holding personal data have an identifiable data protection policy.

This policy describes

- The personal data held by the Trustees of Pelham Hall
- The purpose of the data and how they will be used
- The control and security measures taken to ensure compliance with data protection principles

The Trustees holds the following personal data: contact details for communication with residents of the area; bank account details required for audit and accounting purposes (including the 100 Club scheme); and details relating to individuals who hire the hall or use its facilities.

Confidentiality

It is an important policy of the Trustees that no personal or contact details kept on the Pelham Hall database are passed on to others outside the Trustees without the explicit consent of the individuals concerned at the time. Trustees asked by a resident about contacting another individual for a legitimate reason should pass on the request and gain consent before any personal details are shared.

When using the Pelham Hall database to send an email to multiple people, Trustees must use the Bcc (blind copy) field to maintain confidentiality of email addresses.

Communication Data

The Trustees holds limited personal data for the purposes of communicating information that may be of interest to or may affect residents of the area. In some cases, communications may include news about fundraising events or activities (such as lotteries) run by the Trustees or other local organisations. The Trustees may occasionally use the contact details for direct fundraising appeals.

In most cases only personal email addresses are held, but telephone numbers and house addresses may also be retained for contact purposes.

Individuals must explicitly request to be included on this contact list, giving consent for their data to be used for this purpose. In each communication, individuals should be informed of how to remove their consent.

Contact information is held in a spreadsheet mailing list, which includes names, contact details, and date and method of consent. A second file holds similar contact details for people who have volunteered to help with Trustees activities. This is shared with Trustees involved with organising the activities.

Where an individual has requested removal from the mailing list (by contacting webmaster@pelhamhall.org.uk), their contact details must be removed and a record of their request maintained in the same file.

The files are held by a limited number of Trustees on their personal computers, with one master copy maintained by the Trustee responsible for communications, and backup copies held by other Trustees as required.

Finance Data

The Trustees holds information about named individuals who have made donations or payments to the Hall. The data is held by the Treasurer for the purpose of providing an audit trail for the accounts, and includes the date and amount received, payment method and, in some cases if required, contact details. Further details of cheque payments are retained for a period to provide details in the event of a complication with the payment (e.g. as evidence of payment received or cheques lost).

The data are also used for the production of Gift Aid claims and is retained in relation to HMRC requirements relating to Gift Aid. **Eligibility for Gift Aid must be confirmed by means of a form completed either digitally or in hard copy by the individual, and includes contact details, postal address and confirmation of tax status.** These forms are retained securely in hard copy by the treasurer in accordance with the requirements of HMRC.

Data are held separately relating to individuals participating in the 100 Club Lottery (name, addresses, contact details, payment records and records of payments to winners). **These data are held in electronic or hard copy form by the Trustees responsible for the scheme and should be used only for communications in relation to the scheme. Individuals must complete forms confirming their consent to the terms of membership of the scheme.**

Participants in the 100 Club must be notified that as part of membership that their names will be published in the village newsletter and on the web site if and when they win prizes in the lottery.

Finance data is made available to Trustees as appropriate and is made available to the independent examiner of the accounts for audit purposes on an annual basis.

Names of individuals donating to the Hall must not be made public without the specific consent of the individual on each occasion.

Data Relating to Users of the Hall Facilities

Individuals using Hall facilities must complete forms confirming acceptance of the terms and conditions of use. These include contact details as required to facilitate the booking. These forms are retained securely by the booking clerk and data required for processing payments is passed on to the treasurer and incorporated into the finance data described above.

Booking forms are retained for as long as necessary to provide evidence in the event of future issues arising from the use of the Hall, for example for insurance purposes.