

Brighton Consort Data Protection Policy

AIMS OF THIS POLICY

Brighton Consort needs to keep certain information on its audience members, donors and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulation (GDPR) 2016. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

Definitions

In line with the GDPR principles, Brighton Consort will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not be transferred outside the EU

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

Type of information processed

Brighton Consort processes the following personal information:

- The Brighton Consort mailing list with different subsets of data
 - entire list

- email only list
- workshops list
- Contact details for soloists who have performed in our concerts in recent years.
- Contact details for venues we book for concerts

Data is stored on individual members' computers, backed up to a USB memory stick, and held on Dropbox which is an encrypted cloud storage service.

Responsibilities

Under the GDPR, overall responsibility for personal data in a voluntary organisation rests with the governing body. In the case of Brighton Consort, this is the Choir Committee.

The Choir Committee is the Data Controller. The Data Protection Officer is Mike Clemens. The Data Controller and Data Protection Officer are responsible for:

- understanding and communicating obligations under the GDPR
- identifying potential problem areas or risks
- producing clear and effective procedures

All Committee members who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Policy Implementation

To meet our responsibilities Brighton Consort will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information knows what to do.
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely.

Training

Training and awareness raising about the GDPR and how it is followed in this organisation will take the following forms:

General training/awareness raising: review of policy every two years for all Committee members and Trustees.

Gathering and checking information

Before personal information is collected, we will consider what details it is necessary to collect, and how long we are likely to need this information.

We will inform people whose information is gathered about why the information is being gathered and what the information will be used for.

We will regularly check information to ensure that personal information kept is accurate.

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

Retention periods

Brighton Consort will ensure that information is kept for no longer than is necessary for the organisation to carry out its activities.

Data Security

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- Passwords
- Limiting what we store online
- Other measures

Procedure in case of a breach

When a breach of data protection occurs, consideration will be given to reviewing practices. In addition, Brighton Consort will consider whether the breach should be reported to the Information Commissioner.

Subject Access Requests

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with GDPR.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the current Chairman of the Choir Committee (presently Michael Clemens, Ham Cottage, Albourne Road, Hurstpierpoint, Hassocks BN6 9ES; M.Clemens0@gmail.com)

The following information will be required before access is granted:

- Full name and contact details of the person making the request
- Their relationship with the organisation

We may also require proof of identity before access is granted. The following forms of ID will be accepted: passport, driving licence, birth certificate.

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within 40 days of receiving a written request.

Review

This policy will be reviewed at intervals of 2 years to ensure it remains up to date and compliant with the law.

Approved by Brighton Consort Committee on ...6th June 2018.....

Next review date6th June 2020.....