

BSC Data Protection policy (June 2020)

Overview

Key details

- Policy prepared by: Bournemouth Symphony Chorus (BSC)
- Approved at a meeting of BSC Trustees on: 12/02/2018
- Amendments approved at Board of Trustees meeting 8th June, 2020.

Introduction

In order to operate, BSC 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 should be collected, stored and used in order to meet BSC's data protection standards and comply with the law.

Please note that all references to BSC (Bournemouth Symphony Chorus) refer to all aspects of the organisation including its Children's Choir and Youth Chorus (BSCC & BSYC)

Why is this policy important?

This policy ensures that BSC:

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect 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 BSC, e.g.:

- Committee members
- Employees and volunteers
- Members
- Contractors/3rd-party suppliers

It applies to all data that BSC holds relating to individuals, including:

- Names
- Email addresses

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- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

Roles and responsibilities

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

Data controller

The Data Controller for BSC is John Martindale (BSC Vicechair/Website Manager) He, together with the Trustees, are 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

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

- A member's name 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 on their payment history for 'subs'.
- 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 will 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 BSC to communicate with them about group activities, and/or for Direct Marketing. See 'Direct Marketing' below.

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

When collecting data, BSC 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, subs 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

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

E.g. we need to collect telephone numbers from members in order to be able to contact them about group administration, but data on their marital status or sexuality will *not* be collected, since it is unnecessary and excessive for the purposes of group administration.

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

BSC 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 at any point by contacting the Data Controller or a person to whom the role of Data Manager has been assigned by the Board of Trustees

5. We ensure data is not kept longer than necessary

BSC 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.

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 about them. Any such request will be actioned within **[14]** 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 30 days of the Board Meeting following request being made.

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- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within [14] 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 any automated decisions made based on their data. Any such objection will be considered by the Trustees, and a decision communicated within 60 days of the request being made

7. We keep personal data secure

BSC will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- 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 securely
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the group. 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

BSC 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

We only share members' data with other members with the subject's prior consent

As a membership organisation BSC encourages communication between members.

To facilitate this:

- Members can request the personal contact data of other members in writing via the Data controller or Membership Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, not financial or health data) and the subject consents to their data being shared with other members in this way

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Direct Marketing

BSC will regularly collect data from consenting supporters 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 BSC 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' link in an email). Opt-out requests such as this will be processed within 14 days.

Cookies on the BS 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.

BSC itself does not make use of cookies but our web hosts do for Google analytics. The website, www.bschorus.co.uk carries a link to the information and host's cookie policy .

There is a link to our Data Protection Policy on the home page of our website which gives more details