



Data Protection Policy

Overview

Key details

- Policy prepared by: Lance Redler, Choir Secretary
- Approved by Committee on: 27 February 2018
- Next review date: February 2019

Introduction

In order to operate, *The Wing Singers* needs to gather, store and use certain forms of information about individuals.

These can include members, audiences and potential audiences, 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 *The Wing Singers'* data protection standards and comply with the law.

Why is this policy important?

This policy ensures that *The Wing Singers*:

- 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 *The Wing Singers*, e.g.:

- Committee members
- Task Volunteers

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

- Names
- Email addresses
- Postal addresses
- Telephone numbers

- Any other personal information held (e.g. financial)

Roles and responsibilities

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

Data controller

The Data Controller for *The Wing Singers* is the current Choir Secretary who, together with the 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 Wing Singers 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 obtained when they first join the choir, 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 history for subscriptions.
- The name and contact details of task volunteers and Committee members will be collected when they take up a position. This will be used to contact them regarding group administration related to their role.
- 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 Wing Singers* to communicate with them about group activities.

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

When collecting data, *The Wing Singers* will always explain to the subject why the data is required and what it will be used for. On the membership proforma for example:

'Please enter your personal details, including email address, on the form below. This enables us to maintain a membership record and send you email updates for choir administration, including messages 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 reasonably be considered as related to it. For example, contact details may be shared as necessary with Committee members or task volunteers, but we will never pass on personal data to other third parties without your explicit consent.'

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

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

(e.g. we need to collect email addresses and 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

Any individual will be able to update their data at any point by contacting the Data Controller.

5. We ensure data is not kept longer than necessary

The Wing Singers will keep data on individuals for no longer than one month 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 can request to see any data stored about them. Any such request will be actioned within 14 days of the request being made.
- Members can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- Members 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 Committee, and a decision communicated within 30 days of the request being made.

7. We keep personal data secure

The Wing Singers 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) will be stored in a locked container by the Data Controller.
- Access to data will only be given to relevant Committee or choir members 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.

Member-to-member contact

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

As a membership organisation *The Wing Singers* encourages communication between members.

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