

BUDLEIGH SALTERTON MALE VOICE CHOIR  
Data Protection Policy

**Introduction**

Budleigh Salterton Male Voice Choir (the Choir) is a male voice choir with around 60 members. It is registered with the Charity Commission, Registration Number 283098.

The Choir is managed by an Executive Committee (the Committee) elected annually by its membership. The Committee consists of the offices of Chairman, Vice Chairman, Secretary, Treasurer, Choir Manager, Librarian, Musical Director, 4 section leaders and up to 5 additional members are co-opted to carry out specific tasks.

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 for members, the Choir has a website maintained and administered by an external professional provider. 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 the Choir shall regularly review its systems, at least annually.

**Disclosure**

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 Choir 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 is registered with the Information Commissioner's Office as an organisation that processes Personal Data.

**Purposes**

We may hold your data to supply to HMRC for tax purposes (gift aid claims need to reference individuals relating to the claim)

We also hold bank details for some members for the purpose of:-

- a) Creating subscription Standing Orders (we have copies of the forms completed and signed by the members that are sent to banks to set up standing orders).
- b) Making payments to members 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 the choir 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 Choir'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 Person 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**

To ensure that personal data is kept for no longer than necessary, the Choir shall put in place an archiving policy for each area in which personal data is processed and review this process annually.

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 or other matters. 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 number of rehearsal nights and completing an application form, where the person's details and consent will be entered, which is retained by the Treasurer.
3. Complete lists of members are available only to the 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 appropriate Officer of the Choir.
6. With written consent of the individuals, lists of members in each of the sections are passed to members, usually electronically.
7. The treasurer holds the information required by the Charities Commission and 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.
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. Data protection will be included as a regular item on the Committee meeting agenda.
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.