

# **NORTHAMPTON MALE VOICE CHOIR**

## **Data Protection Policy**

### **INTRODUCTION**

Northampton Male Voice Choir (the Choir) is a male voice choir with around 60 auditioned volunteer members. It is registered with the Charities Commission; Registration Number 1116437.

The Choir is managed by an Executive Committee (the Committee) elected annually by its membership. The Committee consists of the officers of Chairman, Secretary, Treasurer, and Musical Director, 4 section leaders and a representative of the friends of the choir. 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 to members the Choir has a website maintained and administered by an external professional provider. There is also a members' area on this site accessed by means of a username and password made available to its members. 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, Northampton Male Voice Choir shall maintain a Register of Systems.

The Register of Systems shall be reviewed at least annually.

### **Disclosure**

Rarely the Choir may need to share data with other agencies including the Local Authority and funding bodies.

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 DC 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 ensures that security is in place to safeguard personal information.

The Choir treats individuals justly and fairly in accordance with its Equality Policy.

Northampton Male Voice Choir shall register with the Information Commissioner's Office as an organisation that processes Personal Data.

### **Purposes**

HMRC for tax purposes (gift aid claims need to reference individuals relating to the claim)

We also hold bank details for some members and the Music Team and committee 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 Northampton Male Voice Choir must be done on one of the following lawful basis: consent, contract, legal obligation, vital interests, public task or legitimate interests.

Northampton Male Voice Choir shall note the appropriate lawful basis in the Register of Systems.

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 Northampton Male Voice 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, Northampton Male Voice 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/repetiteur. It does **not** request information on for example ethnicity and disability and also on other matters covered in its equality policy. 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 rehearsal night where the person's details will be entered on a form. The Recruitment Officer will introduce the person to the Musical Director who will then undertake a brief voice assessment test to establish what appropriate section he will be placed in. The results of the voice test will be known immediately and if satisfactory he will join the choir as a probationer.
3. Complete lists of members are available only to the Choir Committee 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 section leaders usually electronically.
7. The treasurer holds the information required by the Charities Commission.
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. (Appendix 1)
9. 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.
10. Data protection will be included as a standing item on Committee meeting agenda.
11. 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.