

Worcester Operatic & Dramatic Society

Data Protection Policy

Policy approved by WODS committee:	8 th June 2017
Policy became operational on:	1 st July 2017
Next review date:	June 2018

1. Introduction

Worcester Operatic and Dramatic needs to collect, store and make use of certain personal information about their members to fulfil the Society's purposes and to facilitate membership.

This policy describes how this personal data will be handled to ensure robust data protection standards and to comply with the law.

2. Why this Policy Exists

This data protection policy ensures Worcester Operatic & Dramatic Society:

- a. Complies with the Data Protection Act 1998 (and any subsequent amendments) and follows good practice;
- b. Protects the rights of its members;
- c. Is open about how it stores and processes individuals' data;
- d. Protects itself from the risks of a data breach.

3. Data Protection Law

The Data Protection Act 1998 describes how organisations – including Worcester Operatic & Dramatic Society - must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

- a. Be processed fairly and lawfully
- b. Be obtained only for specific, lawful purposes
- c. Be adequate, relevant and not excessive
- d. Be accurate and kept up to date
- e. Not be held for any longer than necessary
- f. Processed in accordance with the rights of data subject
- g. Be protected in appropriate ways
- h. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

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4. Data Protection Law

This policy applies to all members of Worcester Operatic & Dramatic Society, including its youth section (WODYS), and those on the WODYS Waiting List.

It applies to all data that the Society holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- a. Names of individuals
- b. Postal and email addresses
- c. Telephone numbers
- d. Any other information relating to members

Additional information will be held for members of WODYS:

- a. Medical information
- b. Date of Birth
- c. Name of current School/College
- d. Parent/Guardian's names, address, contact details and relationship to member

5. Data Protection Risks

This policy helps to protect Worcester Operatic and Dramatic Society from some very real data security risks, including:

- a. Breaches of confidentiality. For instance, information being given out inappropriately;
- b. Failing to offer choice e.g. all members (or their parents/guardians in the case of under 16 year old members) should be free to choose how the society uses data relating to members;
- c. Reputational damage (i.e. the society could suffer if hackers successfully gained access to sensitive data).

6. Responsibilities

Everyone who is involved with Worcester Operatic and Dramatic Society has some responsibility for ensuring data is collected, stored and handled appropriately.

Every Society representative that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, the Management Committee who are also Trustees for the Society are ultimately responsible for ensuring that Worcester Operatic & Dramatic Society meets its legal obligations, by:

- a. Appointing an appropriate person, if it feels necessary, to keep the committee updated about data protection responsibilities, risks and issues;
- b. Reviewing all data protection procedures and related policies, in line with an agreed schedule;
- c. Arranging data protection training and advice if needed for members covered by this policy;
- d. Handling data protection questions from members;
- e. Dealing with requests from individuals to see the data that the Society holds about them;
- f. Approving any data protection statements attached to communications such as emails and letters.

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The Society's Membership Secretary is responsible for:

- a. Ensuring all systems, services and equipment used for storing data meet acceptable security standards;
- b. Performing regular checks and scans to ensure security hardware and software is functioning properly;
- c. Evaluating any third-party services the Society is considering using to store or process data i.e. cloud computing services.

7. Data Usage

Personal membership data is collected and held by the Society's Membership Secretary. The data is primarily used to contact members to facilitate membership, and to fulfil the Society's purposes.

Unless authorised by the Society's Management Committee (or in the case of WODYS members, the youth group sub-committee) only the Membership Secretary may use the membership database to contact members.

If anyone other than the Membership Secretary uses data from the membership database, that media should be destroyed or erased immediately after use.

In any case, data should not be shared informally and should only be used for the efficient running of the Society.

8. Data Storage

The Society will only store personal information about individuals whilst they remain a member, and for the purposes of facilitating Gift Aid claims, for a period of 6 years after any cessation of their membership. After this period, and following a cessation of membership, the Society will destroy all personal information held about an individual.

An individual may request that their personal information held by the Society is destroyed earlier than the 6 year period described above following the cessation of the membership if they wish, by written application to the Society's Membership Secretary.

These guidelines describe how and where data should be safely stored.

- a. When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it. This applies to data that is usually stored electronically but has been printed out.
- b. When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.
- c. If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- d. Data should be backed up frequently. Those backups should be tested regularly and kept securely.

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9. Data Accuracy

The law requires Worcester Operatic & Dramatic Society to take reasonable steps to ensure data is kept accurate and up to date.

- a. It is the responsibility of the Society's Membership Secretary on behalf of the Management Committee to take reasonable steps to ensure it is kept as accurate and up to date as possible, usually by means of an annual request to members to check their personal data held by the Society.
- b. Members themselves have a responsibility to inform the Society's Membership Secretary if their personal details change at any time.
- c. Data will be held in as few places as necessary.

10. Data Access Requests

All members who are the subject of personal data held by Worcester Operatic & Dramatic Society are entitled to:

- a. Ask what information the Society holds about them and why;
- b. Ask how to gain access to it;
- c. Be informed how to keep it up to date;
- d. Be informed how the Society is meeting its data protection obligations.

11. Disclosing Data for Other Reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Worcester Operatic & Dramatic Society will disclose the requested data. However, the Society's Management Committee will ensure the request is legitimate and seek legal advice is deemed necessary.