

## Haslemere Musical Society

### Data Protection Policy

June 2018

Draft in final review

#### Overview

Haslemere Musical Society (HMS) is a choir and orchestra based in Surrey.

It has several categories of people (data subjects) associated with the Society:

- A committee of volunteers comprising Trustees plus a small number of appointed members
  - The officers of the society are members of this committee
- A membership base of around 100 local amateur musicians, each of whom pays an annual subscription to be a member.
- Patrons and Friends of the society, who donate a sum of money on an annual basis in order to support the society.
- Occasional players (deps), visiting musicians including soloists who are engaged on a concert-by-concert basis.
- Members of the public who join the society on a temporary basis to take part in 'Come and Sing', 'Summer Sessions' and other one-off events.
- Four professionals who are involved on a weekly basis – Musical Director, Chorus Master, Accompanist and Orchestral Leader.
- Members of the public who express an interest in keeping up-to-date with the activities of the Society.

The Society requires information about these people in order to administer the musical activities of the Society – it would be impossible to run the society without a minimum amount of information about its members.

The definition of Personal Information is any information recorded about a person, where that person can be identified from the record. Within the context of Data Protection, HMS is the Data Controller.

This policy sets out how Personal Information should be treated.

#### The Principles of the Data Protection Act 2018

The rules which describe how Personal Information must be treated can be summarised into five Principles:

*Personal information should be:*

*(a) processed lawfully, fairly and in a transparent manner in relation to individuals;*

*(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;*

*(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*

*(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;*

*(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;*

*(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. <sup>1</sup>*

### **Storage and use of Personal Information**

The Society's email list of members is maintained within a Mailchimp subscription service, which uses encryption to secure data. Mailchimp is compatible with the Data Protection Act (GDPR). By using the service, the recipient is able to manage their own contact information, including accessing, correcting and deleting their own data.

Other information may be held by the Secretary, Chairman, Orchestral Secretary or Patrons' Secretary. Only information relevant to their role may be stored, and it shall be done in an appropriate system (secured files, password-protected spreadsheets etc) for the purpose for which it was intended.

### **Obtaining, passing-on, and Deleting Personal Information**

Personal Information passed to the Society by the Data Subject themselves will be treated as set out in the Notice of Fair Processing (see below).

No member of the Society shall pass information to a third-party without the express permission of the Data Subject.

However, the Society may share your information with the Police where they express a legitimate interest which satisfies the Chairman (or their deputy) that the transfer of information is required to protect the Vital Interests of another individual.

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<sup>1</sup> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/principles/> - 18/01/2018

## Classes of Information Held by the Society

Type of Data Subject	Type of Information	Held by	Accessible to	Reason for Processing	Duration retained
All members, Patrons, visitors, Friends of HMS, and professionals	Name, instrument/voice, contact details (address, telephone number, email address)  Performance history	Mailchimp, relevant officers  Programmes, in the public domain <sup>2</sup>	Officers of the Society where their role requires access to contact information.  Members of the public via historic programmes	To administer the day-to-day operation of the Society  For the production of concert programmes.	For members, 5 years since last contact as a member.  Indefinitely
Temporary members (Come and Sing, Summer Sessions etc)	Contact information <sup>3</sup>	Mailchimp	Relevant officers	To communicate regarding the arrangements for events.	Maintained by the Subject via Mailchimp
Trustees	Name, address, data of birth	Treasurer, Charity Commission	Treasurer, members of the public via the public record	To properly register the Trustee with the Charity Commission	As defined by the Charities Commission
Professionals	Bank account number, payment history	Treasurer	Treasurer	To expedite the contract of employment	As appropriate tax guidance, currently 7 years.
Come and Sing Mailshot List including people who have	Name, instrument/voice (if relevant/known), contact details	Mailchimp	Officers of the Society where their role requires access	To inform them of the Come and Sing event held annually	Maintained by the Subject via Mailchimp.

<sup>2</sup> Members are asked before each concert if they do not wish to be listed in the Programme.

<sup>3</sup> Temporary members consent to this information being used to inform them about upcoming events via the appropriate sign-up sheets at the event or in the sign-up process for booking the event

previously attended an event, or expressed interest in doing so or who sing in local Church choirs or are representatives of other local choral societies	(address, telephone number, email address)		to contact information.		
HMS mailshot list – people who have expressed an interest in hearing news of HMS and its concerts, people in office such Town Mayor	Name and email address	Mailchimp	Officers of the Society where their role requires access to contact information.	To invite interested parties to events held by HMS including concerts, Come and Sing, and other social events.	Maintained by the Subject via Mailchimp
HMS Officers	Name, email address and phone number	Website and Blue Card	General Public	To provide contact information for HMS to the public	Indefinitely on the Blue Card and until the Officer changes on the website.
Professional and amateur musicians	Name, instrument/voice, contact details (email address telephone number)	Mailchimp	Officers of the Society where their role requires access to contact information.	To invite, if required, to play/sing/conduct for HMS in rehearsal or concert.	Maintained by the Subject via Mailchimp
Vulnerable persons register	Form x in compliance with Safeguarding Policy – name and	Joe please define safe location	Safeguarding Officer and Deputy Safeguarding Officer	To comply with Safeguarding Policy in compliance with Surrey	Permanent record

	details and responsible person's details			County Council requirements (Evie to confirm)	
Parental/guardian consent for vulnerable person to participate in HMS activity	Parental consent forms	Joe please define safe location	Safeguarding Officer and Deputy Safeguarding Officer	To comply with Safeguarding Policy in compliance with Surrey County Council requirements (Evie to confirm)	Permanent record
HMS Confidential Record of Suspected Abuse	Form as defined in Safeguarding Policy (date and version number)	Joe please define safe location	Safeguarding Officer and Deputy Safeguarding Officer	To comply with Safeguarding Policy in compliance with Surrey County Council requirements (Evie to confirm)	Permanent record

**Sensitive Personal Information. \*\*\* to be updated in the context of the Safeguarding Policy\*\*\***

The Haslemere Musical Society does not collect or process any Sensitive Personal Information (as defined in the Data Protection Act).

A member may informally advise other members or officers if they have a medical or other condition which affects their membership – in particular where this is in relation to their welfare during a rehearsal or concert. This information is not recorded or retained by the Society.

**Automated Processing Activity**

Haslemere Musical Society shall not engage in automated processing of Personal Information.

**High Risk Activity**

HMS does not engage in High Risk activities (as defined by the Information Commissioner's Office). Should any member request permission to perform any new activity which involves Personal Information (via the committee), they should be referred to the Data Protection Officer, who will perform a Data Impact Assessment.

**Data Breach**

The Society has a duty to report any Data Security Breach to the ICO within 72 hours of being informed about the breach. Therefore, those officers who hold Personal Information shall inform the Data Protection Officer **immediately** should they suspect that data has been lost or stolen. The DPO will assess, with the Chairman, whether a breach has taken place, and will take any further action necessary.

**Subject Access Request**

Any member who wishes to view the information that the Society holds about them should view their Mailchimp preferences, or consult the relevant Officer.

Where the Information is available via an internet service, or other public record, the officer will normally refer the member to that source.

**Complaints**

Any complaint about the Society's use of Personal Information should be addressed to the Data Protection Officer in the first instance.

If the matter is not resolved to your satisfaction, you can consult the Information Commissioner's Office: [www.ico.org.uk](http://www.ico.org.uk).

### **Notice of Fair Processing – all Members, Patrons, Trustees, Visitors and Professionals**

Haslemere Musical Society is a charitable, amateur society whose purpose is to perform concerts and other musical events, and provide a broader musical education in the Haslemere Community (see the Constitution for full details).

In order to inform our **regular audience, visitors and Patrons** about concerts, events and other musical activities commensurate with the aims of the Society, we operate a self-service mailing list (Mailchimp). You can add, view, or delete your Mailchimp record at any time. Adding your contact details to Mailchimp is considered giving us *consent* to send you information about the Society, its concerts and events – and we will continue to do so until you withdraw your consent by deleting your record. We will not transfer your information to any other body, nor request that is processed by any other organisation.

In order to operate as a Society, we require Personal Information about all **members** and **professionals** including your name, instrument, and contact details (address, email address, telephone number) in order to manage the membership, organise rehearsals, and put on concerts. We will not collect any information which is not necessary for this purpose.

Additionally, if you have been engaged by the society on a professional basis, we require the details necessary to pay you (i.e. bank account number and payment records).

We are unable to manage the Society without this information – it is a condition of your membership that you provide us the information we need in this respect.

For all members, visiting musicians and professionals, plus Patrons, we will print your name and instrument in the concert programme unless you ask us not to, in which case we will endeavour to omit your name from the programme.

The Society is required to provide information about its **Trustees** to the Charity Commission.

Finally, we may pass your contact details and any other information we hold, to the Police, should an officer make a specific, legitimate request which satisfies the Chairman that the release of Personal Information is necessary.

We will not pass your details on to any other body, organisation or individual without your explicit **consent**.