



## Data Protection Policy

### 1) Definitions

**In Sound Company** [ISC] is a community choir based in Stourbridge in the United Kingdom.

Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.

Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying, or deleting personal data.

### 2) Responsibility

Overall and final responsibility for data protection lies with the management team (“Core Group”), who are responsible for overseeing activities and ensuring this policy is upheld.

All ISC members and associates (e.g. volunteers) are responsible for observing this policy, and related procedures, in all areas of their activities with and on behalf of the organisation.

### 3) Overall policy statement

**ISC** needs to keep personal data about its members, associates, and supporters in order to carry out various activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people’s privacy and comply with the UK General Data Protection Regulation (GDPR) and other relevant legislation.

We will only collect, store, and use the minimum amount of data that we need for clear purposes, and will not collect, store, or use data we do not need.

We will only collect, store, and use data for:

- purposes for which the individual has given explicit consent, or
- purposes that are in our organisation’s legitimate interests, or
- contracts with the individual whose data it is, or
- to comply with legal obligations, or
- to protect someone’s life, or
- to perform public tasks.

We will provide individuals with details of the data we have about them when requested by the relevant individual.

We will delete data if requested by the relevant individual unless we need to keep it for legal or membership administration reasons.

We will endeavour to keep personal data up-to-date and accurate.

We will store personal data securely.

We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.



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We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.

We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

To uphold this policy, we will maintain a set of data protection procedures for our committee, members, and associates to follow.

#### 4) Review

This policy will be reviewed no later than every two years.

Authorised Signature	Authorised Signature
Name <b>Jennifer Brown</b>	Name <b>Richard Newhall</b>
Role <b>Chair</b>	Role <b>Core Group Member</b>
Date	Date



## Data Protection Procedures

### 1) Introduction

**In Sound Company** [ISC] community choir has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have adopted the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

These procedures cover the main ways we collect and use personal data. We may sometimes collect and use data in ways not covered here. In these cases, we ensure our Data Protection Policy is upheld.

### 2) General procedures

Data will be stored securely. When stored electronically, it will be kept in password protected files. When stored online using a third-party service (e.g. cloud storage) we will ensure that service is compliant with UK GDPR. When held on paper it will be stored carefully in a secure location.

When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely, unless one of the following conditions applies:

- To comply with legal obligations
- Data required for ongoing membership administration (e.g. name, email address, etc.)

We will ensure that data is permanently deleted from computers, and that paper data is shredded.

Current members of Core Group are authorised to access all data in the website administration system, including members' contact and registration details. They will be provided with a user ID and initial password on request. If the person subsequently decides to leave Core Group then their access will be revoked immediately unless otherwise approved by Core Group per below.

Other members of ISC may be granted access to the website administration system to support the day-to-day running of the organisation. All requests must be approved by Core Group in advance.

### 3) Sensitive personal information

**ISC** is a community organisation that welcomes people from across the entire population. From time to time this may necessitate handling sensitive personal information, as follows:

#### *Financial Assistance*

- Some members may be unable to afford the costs of membership (e.g. subscriptions).
- A member of Core Group is given responsibility for holding discussions with the member(s) and deciding to waive charges against agreed criteria.
- Names of members whose charges have been waived will normally be shared with the chairperson and treasurer only.
- Where necessary for the purpose of reviewing a decision, details of a person's circumstances may be disclosed to Core Group. However, such discussions will not be minuted.

#### *Special Needs*

- Some members may have health or other conditions which need to be accommodated.
- The Membership Secretary is given responsibility for holding discussions with all new members, but in some circumstances (e.g. personal relationship) it may be more appropriate for other members of Core Group to hold the discussion.



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- Details of members with special needs will be shared with the Core Group only for the purpose of deciding how best to provide support to that member.
- Such support may involve another member of the choir becoming a “buddy” to the member, in which case the special needs information will be disclosed to the buddy.

From time to time, a member may voluntarily disclose sensitive personal information to a member of Core Group. This should never be regarded as giving consent to share that information.

### 4) Mailing lists

We keep mailing lists. These include the names and contact details of people who wish to receive publicity and other communications from **ISC**. It is a condition of membership that all members are registered for administration purposes.

When people register for a mailing list, we will explain how their details are used, how they are stored, and that they may ask to be removed from the list at any time. We will ask for their consent to receive such communications and only send them messages which they have agreed to receive.

We will not use the mailing list in any way that the individuals on it have not explicitly consented to.

Email addresses relating to other organisations with which a person is involved (e.g. their employer) should not be used unless they are registering in that capacity (e.g. a supplier).

### 5) Contacting Core Group members

The management team (the “Core Group”) need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.

Each member of the Core Group will be assigned an email address for **ISC** use only. These contact details will be shared among the Core Group.

Core Group members will not share each other’s contact details with anyone outside of the management team or use them for anything other than **ISC** activities.

### 6) Consent

The most recent version of this document will be available for review in the ISC web site.

As a condition of membership, all members must confirm that they have read the ISC Data Protection Policy and Procedures and understand how it affects their personal data. This can happen:

- When they first register as a member of ISC; or
- When any update to the policy and/or procedures is published

Any situation that necessitates sharing of personal data outside of these procedures can only be actioned after the person has given their explicit consent either in writing or by email. We will keep records of any consent given for us to collect, use and store data.

### 7) Review

These procedures will be reviewed no later than every two years.



## In Sound Company community choir

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Name <b>Jennifer Brown</b>	Name <b>Richard Newhall</b>
Role <b>Chair</b>	Role <b>Core Group Member</b>
Date	Date