

Lostock Hall Memorial Brass Band – Personal Data Protection Policy

SCOPE

It is the duty of LHMBB to protect Personal Information. This Policy covers the way in which the LHMBB, as a data custodian, obtains uses, holds, transfers and otherwise processes Personal Information about individuals including its members, officer and volunteers. LHMBB respects the rights of individuals in relation to Personal Information under applicable personal data protection laws.

DEFINITIONS

Breach – a Personal Data Protection Incident that LHMBB has determined resulted in accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to Personal Information held by or on behalf of LHMBB

Safeguarding and Compliance Officer – the person appointed by LHMBB to fulfil the role of data protection lead, where required by this Data Protection Policy and/or applicable law.

Personal Data Protection Incident – any activity or event that reasonably indicates that unauthorised, accidental or unlawful Processing of Personal Information held by or on behalf of the Band has occurred or is likely to occur in the future. Through investigation, LHMBB will determine whether a Personal Data Protection Incident constitutes a Breach.

Personal Information – information about individuals who can be identified from that information and as defined by applicable law.

Privacy Impact Assessment – a risk assessment of the impact of processing operations on the protection of Personal Information.

Process, Processing or Processed – any activity involving Personal Information.

Sensitive Personal Information – Personal Information of a particularly sensitive nature that is defined by applicable law.

Strict Privacy – the requirement that members, officer and volunteers on behalf of LHMBB should have access only to those information, that they require in order to perform their role for LHMBB.

POLICY

1. General

1.1. LHMBB officers and members shall manage personal data protection practices within their remits, and shall ensure that Personal Information (and physical assets which contain such information) are protected as required by applicable law.

1.2. LHMBB officers and members shall ensure LHMBB observes the standards set out in this Policy, which apply to the way in which LHMBB processes Personal Information about its members, officer and volunteers, also marketing prospects and website visitors.

1.3. LHMBB officers shall ensure that members, officers and volunteers on behalf of LHMBB, safeguard Personal Information (including any physical assets which contain such information) in their care from loss, disclosure or misuse in accordance with applicable lawful obligations. This obligation applies whether the Personal Information belongs to the members, officers or volunteers.

1.4 LHMBB officers shall ensure that LHMBB maintains a record of all Personal Information Processed as required by applicable law.

3. Collection and Processing of Personal Information

3.1. LHMBB officers shall ensure that Personal Information is processed only for legitimate band purposes and on the basis that such Processing is proportionate to the band purposes to be achieved. LHMBB officers shall also ensure that such Processing occurs only where permitted or required by applicable law.

3.2. LHMBB officers shall ensure that their LHMBB collecting unnecessary Personal Information is not undertaken and that further Processing of such information to be accurate, adequate and relevant for a purpose permitted in accordance with section 3.1.

3.3. LHMBB officers, for all new proposed Processing activities, determine whether a Privacy Impact Assessment is required. Where a Privacy Impact Assessment is required, the LHMBB officers shall ensure that a Privacy Impact Assessment is completed.

3.4 LHMBB officers shall ensure that all information that contain Personal Information have their default position regulated at Strict Privacy and ensure that logs are kept and maintained of all individuals who have access to such systems. LHMBB officers shall further ensure that these access logs are reviewed on an annual basis and any dormant information is deleted and/or destroyed

4. Retention and Disclosure of Personal Information

4.1. LHMBB officers shall ensure that any Personal Information Processed by the band is retained for no longer than is lawful and in any event no longer than is necessary in relation to the purpose for which it was collected.

4.2. LHMBB officers shall ensure that their Business does not disclose Personal Information outside the Band except where there is a lawful, legitimate business purpose for doing so or where required or permitted to do so by applicable law.

4.3. LHMBB officers shall ensure the band establishes and maintains organisational, physical and technical security arrangements appropriate for the Personal Information that it holds.

5. Rights of Individuals

5.1. LHMBB officers shall ensure that, in so far as required by applicable law, there is the ability of individuals to access, correct or to object to the use of Personal Information, or to exercise any other rights to which they are entitled under applicable law.

6. Transfers of Personal Information

6.1. LHMBB officers shall ensure that no Transfers of Personal Information shall be made from the band to entities outside of the Company unless such entities agree through contract or other legal commitment to abide by a privacy standard that complies with applicable law.

7. Incidents

7.1. Any Personal Data Protection Incident, or suspected violation of this Policy, shall be reported promptly to the Safeguarding and Compliance Lead.

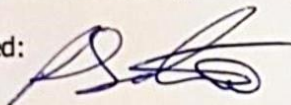
7.2. Where necessary, an investigation shall be conducted and reported in accordance with the requirements set out in section 8.3. of this Policy, and in accordance with applicable laws.

7.3. LHMBB officers ensure that privacy investigations are carried out under a controlled process with appropriate LHMBB officer approval and review points, and with the involvement of the Safeguarding and Compliance Lead, the Chairperson, Secretary, the Band MD and Training Band MD as appropriate.

7.4. LHMBB officers shall ensure that their Business maintains logs of all reported Data Protection Incidents, Breaches and violations of this Policy, and should further ensure that these logs are reviewed on an annual basis.

Last reviewed and updated: 18th February 2019.

Signed:



Paul Baker
Safeguarding and Compliance