

Data Protection Policy



Harborne Orchestra

Harborne Orchestra is a not-for-profit organisation run by the Orchestra Committee. In order to function it needs to collect, store and use certain data (information) about individuals. Predominantly, these will be members but may also include free-lance players, supporters (audience members and volunteers), suppliers/contractors, charities and other groups with and for whom Harborne Orchestra puts on events and others with whom Harborne Orchestra has a relationship or regularly needs to contact.

2. This Policy:

- Protects the rights of members and supporters
- Complies with UK data protection Law and follows good practice
- Protects Harborne Orchestra from the risks of a data breach

3. Application

3.1 The policy applies to all those handling data on behalf of Harborne Orchestra e.g.

- Committee members
- Members
- Contractors/third party suppliers

3.2 Everyone who has access to data as part of Harborne Orchestra has a responsibility to adhere to this policy.

3.3 The Policy applies to all personal data held by Harborne Orchestra including:

- Names
- Email addresses
- Telephone numbers

- Any other personal data held including financial e.g. relating to payment of subscriptions, and Medical (only if essential e.g. for a condition requiring physical adjustments to seating, or a condition for which emergency treatment may be required)

- Photographic or video images.

4. Collection and processing of data

Harborne Orchestra will collect, process and use personal data only for specified and lawful purposes, that is, to manage the membership and activities of Harborne Orchestra in compliance with the law.

4.1 For members:

Names and contact details. These will be collected when individuals join Harborne Orchestra and will be used to contact the member about Harborne Orchestra activities and administration. Financial details may be requested then or subsequently if necessary in relation to the payment of subscriptions;

4.2 For Prospective members:

Names and contact details may be collected when they make enquiries about membership in order to contact them about future membership opportunities or playing to cover a vacancy at a concert;

4.3 For freelance players, supporters and others as appropriate:

Names and contact details may be requested when they are involved in or make enquiries about a Harborne Orchestra concert or other event. These may be used to provide information about the event

including about the purchase of tickets if appropriate.

4.4 For members, Prospective Members, Freelance players, supporters and others as appropriate:

With their consent names and contact details and other details may be collected at any time and used to send e.g. the Orchestra's occasional newsletter, information promoting concerts, fundraising and other items of interest or relevance to Harborne Orchestra, including activities of other groups with whom Harborne Orchestra has shared interests.

When collecting data Harborne Orchestra will always explain why the data is required and for what it will be used. Individuals may unsubscribe from these mailings at any time.

4.5 Disclosure and Barring Service (DBS)

The orchestra may collect and hold data in connection with and relevant to Disclosure and Barring Service (DBS) checks. All information obtained through a DBS check will be processed and held in accordance with Harborne Orchestra's Data Protection Policy.

5. Data collected and stored will be relevant and not excessive

The data collected by Harborne Orchestra will be only that required for its intended purposes. For example, member's names and contact details are necessary in order to communicate information about rehearsals, concerts and subscriptions etc. Data on age, marital status, sexuality etc. is not necessary for the purposes of running Harborne Orchestra and will not be collected.

Harborne Orchestra will never use data for any purpose other than that stated or that can be reasonably considered to be related

to it. Harborne Orchestra will never share or pass on personal data to any third party without the explicit consent of the subject.

6. Harborne Orchestra will ensure that data will be stored securely.

6.1 Electronically-held data will be kept within a password-protected and secure environment. The Committee may use a shared drive facility to which access is password-protected and within which individual files are also password-protected.

6.2 Physically-held data will be stored in a location that is not generally accessible to the public and in such a way that it is not readily visible.

7. Data will be accurate and kept up to date

Members may be asked from time to time to check and update their data and can have their data updated at any time by contacting the Secretary.

8. Data retention

Harborne Orchestra will not keep data on individuals for longer than is necessary. Information about members will be retained for a maximum of six years (in line with HMRC tax law) after the last contact with Harborne Orchestra except that, where appropriate, data may be retained indefinitely for historical/archive purposes.

9. Rights of Data Subjects

Any individual for whom Harborne Orchestra holds any personal data has the right:

9.1 To view the data

9.2 To request a copy at any time, including in electronic format if applicable

9.3 To have any error corrected

9.4 To have data erased

Information about individuals will be deleted as far as possible on request except

where it may be required for tax purposes in which case it will be deleted six years after it was obtained or last used.

9.5 **To opt-out** of the emailing list at any time.

9.6 **To restrict processing**¹

9.7 **To cancel membership** at any time

10. Automated decision-making or profiling technologies.

The law bestows certain other rights in respect of automated decision-making or profiling technologies. Harborne Orchestra does not currently use these technologies. Any proposal to use them in future will be assessed in the context of contemporary data protection law and, if used, will be implemented to comply with the law.

11. Management of data collection and storage.

Data collection and storage is managed on behalf of the Committee by the Secretary who may be contacted at orchestraharborne@gmail.com.

12. Complaint

12.1 Any individual who is dissatisfied with the handling of their personal data should, in the first instance, notify the Chairman or the Secretary. If an effective remedy is immediately to hand the Committee will record the objection and the steps taken to deal with it. A copy will be provided to the individual concerned.

12.2 If such a remedy is not available, the Committee will carry out a review of the problem and communicate its decision in writing to the individual concerned within 21 days. If a breach has occurred the

Committee will explain in writing the corrective action it intends to take. This will be completed within a further 21 days and confirmation provided in writing that this has been done.

12.3 If, after this process, a complainant is not satisfied they may complain to the Information Commissioner's Office at www.ico.org.uk.

13. Data Breach

In the event of a data breach the Committee will investigate the causes, inform individuals affected and provide them with appropriate information. It will take any necessary corrective action and actively seek to prevent any future occurrence.

14. Notification to members

The existence of this policy will be notified to members and supporters and made available on the Harborne Orchestra website. The attention of newcomers will be drawn to it through the document '*Information for New and Prospective Members*'.

15. Regular Review

15.1 The Committee will consider the policy annually (usually at the first committee meeting after the AGM) in order to:

- Review the principles of data protection law;
- Review any changes to Harborne Orchestra and its processes and assess whether these have an impact on data protection;
- Ensure that any outgoing member of the Committee returns any paper files and has deleted any electronic files on a laptop or other device containing

¹ This can be complicated and is unlikely to apply to Harborne Orchestra. If an episode should occur the relevant regulations will be followed.

personal data associated with Harborne Orchestra;

- Ensure that all any personal data which is no longer needed is deleted;
- Ensure that all necessary permissions are in place;
- Ensure that any new member of the Committee understands the processes by which the Committee manages and uses personal data;
- Assess training needs associated with protecting and managing individuals' data in line with statutory requirements and provide such training if necessary.

This policy was amended and adopted by the Committee on 2nd December 2021

Acknowledgements

Harborne Orchestra is grateful for guidance in the preparation of this Policy drawn from:

GDPR: Audit Document. National Federation of Music Societies trading as 'Making Music'

GDPR: A Survival Kit for Small Clubs, Societies and Organisations. Ditchling Village Association

Data Protection Policy, Cambridge Concert Orchestra

GDPR Guidance for PTAs, Parentkind

Information Commissioner's Office Website,

<https://ico.org.uk/>