

Friends of Shanklin Theatre (FOST) Data Protection Policy

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1. Key Details

Policy prepared by:	FOST Data Protection Controller Jacqui Robertson
Policy approved by:	FOST Committee
Policy approved on:	10/05/18
Policy became operational on:	01/06/18
Next review date:	May2020

2. Introduction

FOST needs to gather members' personal data to enable membership, fundraising and communication of benefits as well as volunteer recruitment and communication in line with the legitimate interests according to the FOST constitution objectives – see below Item 6 of the 2019 FOST Constitution

Objectives The primary objectives of FOST are as follows:

6.1 To encourage public support for Shanklin Theatre including, as necessary, providing a strong and focused public voice in support of its continuation.

6.2 To provide support services and volunteers as appropriate in consultation with Theatre management and users.

6.3 To undertake any other activities which are directed towards constructive support of Shanklin Theatre, including raising funds to benefit the Theatre.

This policy describes what and how the data is collected, how it is stored and handled to comply with FOST policy and the law.

3. Why this policy exists

This policy exists to ensure that FOST:

- Complies with data protection law and follows good practice
- Protects the right of FOST members and Prize draw winners
- Is open on how it stores and processes individual's data
- Protects itself from Data Protection breaches

4. Data Protection Law

Under the GDPR May 2018, the data protection principles set out the main responsibilities for organisations.

Article 5 of the GDPR requires that personal data shall 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

Article 5(2) requires that:

“the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

5. Policy Scope

This policy applies to all those handling FOST personal data.

It applies to all individual personal data necessary for FOST membership, FOST volunteering and Prize Draw. This includes:

a. Data for all members

For all members, FOST keeps the following FOST members’ personal data given by the member on the membership application form, and subsequent additions, to uniquely identify the member, keep records of the fees paid and correspondence sent.

- a unique identifier: FOST number
- Name
- Address
- Contact details (Tel Number(s), email if available, address)
- Type of membership
- Data Protection Option records regarding emails for FOST promotional information
- amount paid
- payment type, date, due date for renewal
- date of communication sent such as newsletter, AGM, Membership reminders
- date when a member has won the FOST members’ monthly draw

- b. Additional data kept by FOST for members who are volunteering
 - Volunteer status – a code indicating at what stage of volunteering a members is
 - Joining date
 - Leaving date
 - Department
 - Dates of issue of car park permit and ID Badge
 - Training records
 - Volunteer Application Form
 - Photo

- c. Prize Draw Data
 - Name
 - Telephone number

6. Reason for keeping the data

- a. For sending correspondence for legitimate interests according to FOST constitution objectives
 - i. Provide a membership card
 - ii. To send information relating only to FOST such as:
 - FOST benefits including the quarterly Stage-Write Newsletter and special FOST ticket offers
 - Annual FOST AGM notifications
 - FOST news including Fund raising activities
 - Invitation to FOST events
 - FOST membership reminder
- b. To ensure that:
 - FOST has a record of members' choices regarding communication.
- c. To ensure members who are volunteers:
 - have consented to legitimate sharing on personal data within the theatre for volunteering purposes
 - have received the appropriate training for their role
 - have access to the car park
 - have a means to identify themselves while on duty
- d. Financial records
 - To ensure members are reminded of the membership fees due date.
 - To record accurately fees received for FOST accounting purposes
- e. In order to be able to notify prize draw winners

7. Responsibilities

- FOST Data Protection Controller

The controller shall be responsible for, and be able to demonstrate, compliance with the GDPR principles.

- FOST IT Manager

The IT Manager shall be responsible for supporting the Data Protection Controller in advising on IT systems and users' procedures and taking the necessary steps to make IT systems compliant with GDPR principles.

- FOST Committee

The Committee shall be responsible in approving this policy, providing funding and expertise to enable this policy to be applied. The committee will also be responsible for supporting the Data Protection Controller in ensuring that volunteers using FOST members' personal data are following the guidelines listed in this policy.

- FOST Membership Secretary

As key FOST personal data processor, the membership secretary shall ensure compliance with this policy with data recording, storing, processing, deleting and disclosure and with communicating with FOST members.

- FOST Volunteer Co-ordinator

As key FOST personal data processor, the FOST volunteer co-ordinator shall ensure compliance with this policy with data recording, storing, processing, deleting and disclosure, with sensitive data confidentiality and with communicating with FOST volunteers.

- FOST Volunteer Supervisors

Volunteer supervisors shall be responsible for ensuring that:

- sensitive volunteer data confidentiality is respected,
- volunteers in their team are aware of the policy guidelines
- data accuracy is maintained by communicating changes with the FOST Volunteer Co-ordinator

8. Data protection risks faced by the organisation

This policy helps to protect FOST from some very real Data Protection risks, including:

- Breaches of confidentiality; for instance, individual personal information given inappropriately
- Failing to offer choice; for instance, all individuals should be free to choose how FOST uses their information
- Reputational damage; for instance FOST could suffer if hackers successfully access personal data.

9. Key precautions to keep data protected: Storage, back up and use

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data protection controller.

a. Guidelines for printed material:

- When not required paper or files should be kept in a locked drawer or filing cabinet
- No additional paper copies of data should be made of the data unless absolutely necessary.
- FOST data users should make sure paper and printouts aren't left where unauthorized people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

b. Guidelines for electronically stored data

Data stored electronically must be protected from unauthorized access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared.
- If the data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used
- Server containing personal data should be sited in a secure location
- Data should be backed up frequently and the back-ups should be tested frequently
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

c. Data use

- When working with personal data, data users should ensure that the screens of their computers are always locked when left unattended.
- Data users should not save copies of personal data to their own computers. Always access and update the central copy of data

10. Data accuracy and Deletion

a. Data accuracy

The law requires that FOST keep reasonable steps to ensure personal data is kept accurate and up to date.

FOST Members' electronic personal data will be amended on request of individual and following email non delivery

b. Data deletion

- i. FOST Members

- When a member informs the membership secretary that they no longer want to be a member, the secretary will change their status to non active and will proceed to deletion of data.
 - A member not renewing their membership on the renewal date (end of month of joining FOST) will have 90 days to renew before their membership will lapse. Upon lapsing, data in the current membership list will be deleted
- ii. FOST Members – Volunteer information
- When volunteers are not renewing or leave before their membership is due, their status is changed to “non volunteer”
 - All the information specific to volunteering will be deleted
 - The 90 days rule will apply regarding their membership.
- iii. Prize Draw Winners
- Personal information about prize draw winners is retained for a year

11. Member Access Request

All individuals who are the subject of personal data held by FOST are entitled to:

- Ask for information FOST holds on them and why
- Be informed on how to keep it up to date
- Be informed on how FOST is meeting its Data Protection obligations

Member access request should be made to the data protection controller by e mail or post.
FOSTmembership@shanklintheatre.com

FOST Membership

Shanklin Theatre, Prospect Road, Shanklin, Isle of Wight, PO37 6AJ

The data protection controller will aim to reply within 14 days.

The data protection controller will always verify the identity of individual making a request before handing over any personal data.

12. Data disclosure

This applies to personal data which can identify a person when shared externally to FOST.

A subset of the members' personal data is shared with the Box Office to enable the Box Office staff to check if a member of the public is a FOST member to allow this person to use the FOST benefits e.g. discounts on shows.

13. How FOST keeps individuals informed about data it holds

FOST aims to ensure that members are aware that their data is processed and that they understand:

- What data is held and how it is used
- How to exercise their rights

To this end,

- FOST has a privacy statement which will be included in the Welcoming letter for new members and on the FOST website.
- A copy of the FOST data protection policy will be located in the Box Office and on the FOST website.
- Any correspondence with members will give them the option to opt out of receiving FOST promotional information

14. General volunteers' guidelines

- The only people able to access personal data covered by this policy should be those who need it for their activities relating to FOST.
- Data should not be shared informally.
- FOST will provide training to those handling personal data to help them understand their responsibilities when handling data.
- Personal data should not be disclosed externally.