

DATA PROTECTION POLICY & PROCEDURES

Woodside Community Centre Bolnore Village Community Partnership (BVCP)

1. Introduction

Bolnore Village Community Partnership (BVCP), which operates Woodside Community Centre, is committed to protecting the rights and privacy of individuals.

In order to manage and operate Woodside Community Centre, BVCP needs to collect and use certain types of personal data. This personal information must be collected, processed and stored securely.

BVCP complies with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, which govern the use of personal data.

Personal data may be held on computers, booking systems, mobile devices or in paper files. Personal data may include names, addresses, telephone numbers, email addresses, booking information, meeting minutes, photographs and video recordings (including CCTV footage).

The trustees of BVCP act as the **Data Controller** and are responsible for ensuring that personal data is processed lawfully and securely.

Trustees, staff and volunteers who have access to personal data must comply with this policy.

BVCP is registered with the Information Commissioner's Office (ICO) as a Data Controller. Registration Number: ZA088428.

2. Purpose of this Policy

The purpose of this policy is to explain how Woodside Community Centre collects, uses, stores and protects personal data.

BVCP recognises that the lawful and correct handling of personal data is essential to maintaining the confidence of those who use the Centre and to protecting individuals from risks such as identity theft, misuse of information or loss of privacy.

3. Definitions

Data Controller - The trustees of Bolnore Village Community Partnership who determine what personal data is held and how it is processed.

Data Subject - An individual whose personal data is held by the organisation, such as a hirer, volunteer, donor or employee.

Personal Data - Information relating to a living individual who can be identified from that information, such as name, address, email address or telephone number.

Processing - Any action performed on personal data, including collecting, storing, using, amending, sharing or deleting it.

Information Commissioner's Office (ICO) - The UK authority responsible for regulating and enforcing data protection law.

4. Lawful Basis for Processing Personal Data

BVCP processes personal data in accordance with the lawful bases set out in UK GDPR. These include:

- where processing is necessary for the **management and operation of Woodside Community Centre**
- where processing is necessary to **fulfil contractual obligations**, such as managing hall bookings
- where processing is necessary to **comply with legal obligations**
- where individuals have provided **consent**, for example for marketing or publicity
- where processing is necessary for the **legitimate interests** of operating and promoting the Centre

5. Data Protection Principles

BVCP will ensure that personal data is:

1. Processed lawfully, fairly and transparently.
2. Collected only for specified and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and kept up to date where necessary.
5. Retained only for as long as necessary.
6. Processed in accordance with the rights of individuals.
7. Kept secure and protected against unauthorised or unlawful access, loss or damage.
8. Not transferred outside the UK or EEA unless appropriate safeguards are in place.

6. Use of Personal Data

Woodside Community Centre may collect and process personal data for the following purposes:

- managing hall bookings and hirer records
- maintaining financial and accounting records
- administering volunteers and trustees
- communicating with hirers and users of the Centre
- organising and promoting events
- fundraising activities
- complying with legal and regulatory obligations
- maintaining security and safety of the building, including the use of CCTV where applicable

BVCP will only collect and retain personal data that is necessary for the effective management and operation of Woodside Community Centre.

7. Third-Party Systems

Woodside Community Centre may use third-party systems to manage bookings, communications and administration.

This may include online booking platforms and electronic communication systems used to manage hirer records and Centre operations.

Where such systems are used, BVCP will ensure that appropriate data protection and security measures are in place and that service providers comply with applicable data protection legislation.

8. Privacy Notice

Woodside Community Centre collects and processes personal data for the purposes of managing the Centre, administering bookings and finances, communicating with hirers and users, promoting events and fulfilling legal obligations.

Personal data may be retained for up to **7 years for accounting purposes**, or longer where required by insurers or legal obligations.

Individuals may request details of the personal data held about them by contacting the Centre Manager.

The Centre Manager acts as the primary contact for data protection matters on behalf of the trustees.

A summary privacy notice may also be provided to hirers and users when collecting personal data.

9. Data Subject Rights

Individuals have the following rights under UK GDPR:

- the right to be informed about how their data is used
- the right to access personal data held about them
- the right to have inaccurate information corrected
- the right to request deletion of personal data in certain circumstances
- the right to restrict processing in certain circumstances
- the right to object to certain uses of their data

Requests for access to personal data (Subject Access Requests) will normally be responded to within **30 days**.

Reasonable steps will be taken to verify the identity of the individual before personal data is disclosed.

10. Data Security

BVCP takes appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, loss or damage.

These measures include:

- limiting access to personal data to authorised trustees, staff or volunteers
- using secure passwords on computers and devices
- storing paper records securely
- ensuring electronic data is protected where possible
- deleting personal data when it is no longer required

Passwords should be strong and ideally contain **at least 12 characters**, including a combination of letters, numbers and symbols.

11. Email and Communications

Trustees, staff and volunteers should ensure that personal data contained in emails is handled securely.

When sending emails to multiple recipients who are not known to each other, the **BCC function** should normally be used to prevent unnecessary sharing of personal email addresses.

Emails containing personal data should not be retained longer than necessary.

12. Portable Devices

Where personal data is stored on laptops, tablets or mobile devices:

- devices must be password protected
- devices should not be left unattended in public places
- reasonable precautions should be taken to prevent theft or unauthorised access

13. Data Storage and Retention

Personal data will be stored securely and only retained for as long as necessary.

Typical retention periods include:

- financial records: **up to 7 years**
- meeting minutes and legal documents: **retained indefinitely**
- operational records: retained only for as long as required for operational purposes

When personal data is no longer required it will be securely deleted or destroyed.

BVCP will only collect and retain personal data that is necessary for the effective management and operation of Woodside Community Centre.

14. Photographs and Publicity

Woodside Community Centre may use photographs of events for publicity purposes.

Photographs of children will not be used without the **written consent of a parent or guardian**. At larger events where photographs may be taken, signage or announcements may be used to inform attendees.

This applies to events organised directly by BVCP. Hirers are responsible for obtaining appropriate consent for photography during their own events.

15. Data Breaches

Any suspected loss, unauthorised access to, or disclosure of personal data must be reported immediately to the trustees or the Centre Manager.

The trustees will assess the incident and determine whether it must be reported to the **Information Commissioner's Office (ICO)** in accordance with UK GDPR requirements.

16. Responsibilities

The trustees of BVCP are responsible for ensuring compliance with this policy.

Trustees, staff and volunteers must:

- handle personal data responsibly
- follow this policy and relevant procedures
- report any suspected data breaches promptly

Failure to comply with this policy may result in appropriate action being taken.

17. Policy Review

This policy will be reviewed annually by the trustees or sooner if required due to changes in legislation or operational practice.

Approved by:

Bolnore Village Community Partnership Trustees

Approval Date: 29th April 2026

Next Review Date: April 2027