

PERTH AND DISTRICT PIPE BAND

PRIVACY POLICY

Perth and District Pipe Band recognises that the handling of identifiable written and computerised information is necessary for its effective functioning.

Date Last Reviewed: 24th May 2018

1. AIMS:

The main aims of this policy are to cover confidentiality, data protection & social media and ensure that:

- information given in trust by Band Members and Volunteers is treated with respect
- information is protected through clarity about how it is to be stored and shared
- the boundaries of confidentiality are clearly understood by the Committee
- the Committee are all aware of their responsibilities for protection of confidential information
- the best interests of the Band and its members are protected
- all information held is accurate
- Information given by members is held securely

2. PROTECTION OF CONFIDENTIAL PERSONAL DATA

The Band is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR) 27th April 2016.

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; and
- 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.”

2A. General Provisions

- a. This policy applies to all personal data processed by the Band.
- b. The committee shall take responsibility for the Band's ongoing compliance with this policy.
- c. The secretary will act as the Data Controller for the band.
- d. Each member must opt in, on membership form, for their name and photograph to be used in articles in the Band website, Branch website, RSPBA website and in the press in connection with Band engagements and activities.

2B. Lawful, fair and transparent processing

- a. Only data relevant to the efficient running of the Band will be held
- b. To ensure its processing of data is lawful, fair and transparent, the Band shall maintain the below Register of Systems.
- c. Individuals have the right to access their personal data and any such requests made to the Band shall be dealt with in a timely manner.

Purposes of processing	Categories of individuals	Categories of personal data
Member RSPBA Registration	Member Data	Name Contact Date of birth
Band Website	Member Data	Name Photo
Press & Social Media	Member Data	Name
Archiving Data	Members Data	Name
Request for band	Customer Data	Name Contact

2C. Lawful purposes

- a. All data processed by the Band must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Membership data will only be shared on a need-to-know basis e.g. telephone numbers for emergency telephone purposes
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Band's systems.

2D. Data minimisation

- a. The Band shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

2E. Accuracy

- a. Members will be given an opportunity to ensure that the information held is accurate, normally on a yearly basis.

2F. Archiving / removal

- a. The data will be backed up onto a portable drive regularly and kept in a secure location.
- b. Members have the right to ask for the band to erase or delete personal data where there is no reason for the band to continue to process the personal data. This right would apply if the individual ceases membership or the member withdraws consent for non-essential processing.
- c. The request for erasure can be given verbally or in writing. The band will respond to any request within a timely manner.
- d. The Band will remove data from membership database and release RSPBA registration (if applicable) for individuals that have left the band within 1 year.
- e. As part of the maintenance of the Band's archive, held by the AK Bell Library in Perth, a list of current members' names may be supplied on an annual basis. So too, at the beginning of each year, are the all committee meeting minutes from two years earlier and the full band history for the year just come to an end.
- f. The Band will ensure that disclosure information is destroyed in a secure manner e.g. by shredding. We will ensure that disclosure information which is awaiting destruction will not be kept in an insecure environment.

2G. Security

- a. All communication with members
- b. Shall be sent in a way which does not disclose other member's details i.e. all emails shall be sent as blind copy.
- c. All data associated with membership will be held by the committee.
- d. Only 1 version of paper files will be stored in a locked filing cabinet or box;
- e. Electronic files with personal information will be stored using password protection.
- f. Electronic files with sensitive information, i.e. medical details, encrypted.
- g. All passwords will be changed annually. Two members of the committee, nominated annually, and the secretary will have knowledge of the password
- h. When personal data is deleted this should be done safely such that the data is irrecoverable.
- i. Access to confidential information, on paper or electronically, will be limited to the Secretary, Pipe Major and the Child Protection Officer

2H. Breach

- a. Inappropriate disclosures will be treated as a disciplinary issue and initially investigated by the Committee Chairman unless he is involved when the matter will be taken up by the Pipe Major or Secretary. Any subsequent action will be decided by the Committee.
- b. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Band shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

3. EXCEPTIONAL DISCLOSURE OF INFORMATION

Exceptional circumstances may occur where the protection of a Band Member must be ensured and to do so would involve disclosure of information, whether or not agreement had been

reached. In this situation those involved should seek advice immediately from the Child Protection Officer or the Pipe Major in his absence.

The Secretary will conform to Health and Safety legislation by informing people of any notification received about contagious or notifiable disease suffered by any person with whom any member has had contact.

4. SOCIAL MEDIA

4A. Responsibilities for input

Social media accounts for Perth and District Pipe Band will be set up by the Secretary or Assistant Secretary on behalf of the committee. Other members of the band who wish to control Facebook, Twitter or other social media accounts will seek agreement from the committee. Upkeep, maintenance and input of profiles and entries will only be carried out by approved members of the committee.

4B. Monitoring content

Nothing detrimental to Perth and District Pipe Band will be posted by members on Perth and District Pipe Band social media sites.

4C. Monitoring content cont.

Wall posts and other comments posted by members will be monitored. If posts are deemed unsuitable they will be deleted. Postings from people who frequently post unsuitable comments will be blocked.

4D. Personal social media

On personal social media sites:

- a. If the member mentions Perth and District Pipe Band or anything connected to it should identify that you are a member of Perth and District Pipe Band and that the views expressed are yours alone and do not represent the views of the band.
- b. Members should exercise good judgement and post nothing detrimental to Perth and District Pipe Band on these sites.

5. MONITORING AND REVIEWING THE POLICY

The working of this policy will be monitored regularly, with a record of the number and nature of formal complaints being held by the Secretary and/or the Child Protection Officer (if appropriate) for this purpose.

A review of this policy will take place within a year of its adoption to ensure its effective operation and approximately annually after that.