



LOMOND AND CLYDE COMMUNITY ORCHESTRA GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

Introduction

Under the General Data Protection Regulations (GDPR) 2016 which came in to law in May 2018 all organisations are required to have an open and transparent policy on what data is stored, how and why. This policy has been written to comply with this legislation.

In order to operate, the LoCCO management committee needs to gather, store and use information about individuals. This policy explains how this data is collected, stored and used in order to meet data protection standards and comply with the GDPR.

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.
- 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.
- e. Destroyed when no longer necessary.
- f. Processed and held securely.

Roles and Responsibilities

This applies to all those handling data on behalf of LoCCO. It applies to all the data that LoCCO holds relating to individuals comprising:

Name
Address
E-mail
Phone numbers
Instrument played
Subscriptions payment
Fees payment
Photography consent

The Data Controller is the LoCCO management committee. They are responsible for the secure, fair and transparent collection and use of data by LoCCO.

The Data Protection Officer (DPO) is the secretary of the management committee.

Any questions relating to the collection or use of data should be directed to the DPO or if they are not available to a member of the committee who will pass the request on.

Everyone who has access to data as part of LoCCO has a responsibility to ensure that they adhere to this policy.

Data currently kept by the Data Controller can be broken down into 4 sections.

1. Members playing in the orchestra
2. The conductor and tutors supporting the orchestra.
3. Previous members and members of the public who support the orchestra
4. Financial data

1. Members playing in the orchestra

Definition: anyone who has paid a termly subscription and who has completed a membership form. Children and young people who attend do so with their parents consent who also sign the membership form on the child's behalf.

Data collected:

When a new member joins the orchestra they are asked to complete a hard copy of a form with the following details:

- Name
- Address
- Email address
- Telephone number – landline and mobile
- Instrument played
- Consent for data to be retained
- Consent for photographs to be shared on the LoCCO website and social media.

The information is stored electronically within a password protected and secure environment, a hard copy is also retained securely.

The data is updated each term that the orchestra meets (usually twice per year in the Autumn term and the Spring term).

2. Conductor and tutors

Definition: Anyone engaged by the management committee to act as musical director or tutor sections within the orchestra i.e. woodwind.

Data collected

- Name
- Email address
- Telephone number – mobile
- Section of the orchestra they support i.e. upper strings
- Fees paid

The information is kept so that they can be contacted regarding rehearsals they should be attending, concerts and fundraising events and to comply with financial regulations.

The information is stored electronically within a password protected and secure environment.

3. Previous members and supporters of the orchestra

When a member decides they no longer wish to play with the orchestra they are placed on the Previous Members list. The DPO will contact them asking permission to retain their data.

Supporters are members of the public who have made a donation to the orchestra. The DPO will contact them asking permission to retain their data.

Data collected:

- Name
- Address
- Email address
- Telephone number – landline and mobile
- Donation made

The information is kept so that they can be contacted regarding concerts and fundraising events.

The information is stored electronically within a password protected and secure environment.

The data is updated by the DPO on an annual basis.

4. Financial Data

The treasurer keeps data on:

- Members subscription payments
- Instrument they play
- Fees paid to the conductor and tutors.
- Gift Aid declarations
- Donations

The information is stored electronically within a password protected and secure environment.

The information is kept so that all financial obligations can be met including book keeping and accountancy.

Privacy Statement

The Secretary of the Management Committee will take on the role of DPO unless the management committee decides otherwise at a committee meeting.

- Purpose of collection The information is kept so that members, the conductor and tutors, previous members and supporters of the orchestra can be contacted regarding rehearsals, concerts and fundraising events as appropriate.
- Information is not shared with a third party.
- Individuals rights regarding the data. All members, the conductor and tutors, previous members and supporters will be asked to give their consent for the orchestra to retain the information.
- All members, the conductor and tutors, previous members and supporters will be given details of how to contact the DPO should they want to check their details or have them deleted.

Retention Policy

The data will be stored for as long as:

- A member remains playing with the orchestra. When a member decides to stop playing, they will be moved onto the “previous members list”. The DPO will contact them asking permission to retain their details.
- The conductor continues to lead the orchestra. When they are no longer engaged by the orchestra the The DPO will contact them asking permission to retain their details.
- A tutor continues to support a section of the orchestra. The DPO will contact them asking permission to retain their details.

Previous members and supporters will be asked on an annual basis for permission to retain their data

The data will be reviewed every 3 years by the DPO with other committee members, to be decided on at the time of the review.

Data to be reviewed

LoCCO stores data on:

- digital documents stored on personal devices
- Physical data stored at homes of the committee

Deletion of data

- Physical data will be destroyed safely and securely, including shredding
- All reasonable and practical efforts will be made to remove data stored digitally

Statutory Requirements

Data stored by LoCCO may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Details of payments paid and received (e.g. in bank statements and accounting records)
- Gift Aid declarations records
- Insurance details
- Tax and employment records
- Contracts and agreements with suppliers/customers

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