

## **John Hodges Trust for Harpsden Hall**

### **Data Protection Compliance Policy**

- We only keep data as long as needed to fulfil a particular contract i.e. a one off booking for hall hire will be kept until payment has been completed, the event has taken place and any deposit returned. Forms will be destroyed after the end of the financial year in which the booking was made.
- Regular ongoing booking paperwork is kept securely.
- Employee records are kept for up to 40 years for insurance purposes.
- Financial records and correspondence are kept for a minimum of 7 years.
- The accident book is checked regularly. A page that has been completed is torn out, appropriate action taken and filed securely.
- All personal data is destroyed when no longer needed.
- Old paper copies are shredded.
- Archived important documents such as deeds, minutes and historical archive material are locked in the lockable filing cabinet in the meeting room of the Village Hall
- CCTV footage, if we were to introduce it, is covered by Data Protection legislation and by the Protection of Freedoms Act (POFA) and the Human rights act 1998. Particular care would be taken when using, recording and accessing the material.

**If we suffer a data breach e.g paperwork or IT devices are lost or stolen, or malware is used to gain access to our computer system, the following procedure will take place:**

Any potential personal data breach will be reported to the Data Protection Officer who will investigate and ascertain if the data breach is likely to result in a risk to the individual, for instance damage to reputation, financial loss, loss of confidentiality. If this is the case the ICO will be made aware within 72 hours of the incident being reported.

If in doubt, the ICO helpline 0303 123 1113 can provide clarification. The Data Protection Officer will check to see how a recurrence can be prevented, through better processes, further training or corrective action.

**If someone wants to know what information we hold on them, update the information or be removed from our records, the following procedure will take place:**

If an individual wishes to access any personal data that we hold on them, they need to apply in writing. Steps must be taken to confirm the identity of the individual before providing the information, requiring both photo identification and confirmation of address. Any changes requested to the data, including removal, requested by the individual, will be actioned as soon as possible.

Please make any requests or complaints to: The Data Protection Officer, John Hodges Trust for Harpsden Hall via email: [trust@harpsdenhall.org.uk](mailto:trust@harpsdenhall.org.uk).

If you are dissatisfied with the handling of your request or complaint, you have a right to appeal to the Information Commissioner. There is no charge for making an appeal. Contact details are:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone: 01625 545745 or 0303 123 1113 (local rate) or email: [casework@ico.gov.uk](mailto:casework@ico.gov.uk)