



DATA PROTECTION & GDPR POLICY

Purpose

The Holt Community Centre is committed to protecting personal data and respecting the privacy of individuals. We will collect, use, store, and share personal data lawfully, fairly, and transparently.

Legal Framework

This policy is written in accordance with:

- UK General Data Protection Regulation (UK GDPR)
 - Data Protection Act 2018
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Scope

- Staff and volunteers
- Trustees and committee members
- Service users and visitors
- Hirers and external organisations
- Complainants and safeguarding records

This includes data held in paper and electronic formats.

Definitions

Personal Data: Any information relating to an identifiable living person.

Special Category Data: Sensitive data such as health, ethnicity, religion, or safeguarding information.

Processing: Collecting, storing, using, sharing, or deleting data.



Data Protection Principles

The Holt Community Centre will ensure personal data is:

- Processed lawfully, fairly, and transparently
- Collected for specified, explicit purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Kept only as long as necessary
- Processed securely

Lawful Bases for Processing

We will only process personal data where we have a lawful basis, including:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interests
- Vital interests (emergencies)

Special category data will only be processed where additional legal conditions apply.

What Data We Collect

We may collect:

- Names, addresses, contact details
- Booking and hire information
- Accident, incident, and safeguarding records
- Financial records and invoices

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- CCTV images (where in use)
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How Data Is Used

Personal data is used to:

- Manage room hire and bookings
 - Communicate with users and hirers
 - Meet legal and safeguarding obligations
 - Maintain health & safety records
 - Handle complaints
 - Manage staff and volunteers
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Data Sharing

We may share personal data:

- With emergency services
- With local authorities or safeguarding bodies
- Where legally required
- With insurers or professional advisers

Data will never be sold or shared unnecessarily.

Data Storage & Security

The Holt Community Centre will:

- Store paper records securely
- Protect electronic data with passwords and access controls
- Limit access to personal data
- Dispose of data securely (shredding or secure deletion)



Data Retention

Personal data will be kept only as long as necessary.

Examples:

- Accident records: minimum 3 years (or longer where required)
- Safeguarding records: retained securely in line with guidance
- Financial records: 6 years

A data retention schedule will be followed.

Individual Rights

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Object to processing
- Request data portability
- Withdraw consent (where applicable)

Requests should be made in writing.

Subject Access Requests (SARs)

- Requests will be acknowledged promptly
- Responses will be provided within one month
- Identity may be verified before disclosure



Data Breaches

Any actual or suspected data breach must be:

- Reported immediately to the Centre Manager or Management Committee
- Recorded and investigated

Serious breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours where required.

CCTV

Where CCTV is used:

- Signage will be clearly displayed
- Images will be used only for safety and security
- Footage will be retained for a limited period
- Access will be restricted

Responsibilities

Management Committee

- Overall responsibility for GDPR compliance

Staff & Volunteers

- Must handle data responsibly
- Must follow this policy



Complaints

Any concerns about data protection should be raised through:

- The Centre's Complaints Procedure

Individuals may also contact the Information Commissioner's Office (ICO) if unsatisfied.

Review

This policy will be:

- Reviewed annually
 - Updated to reflect legal or operational changes
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Approval

This Data Protection & GDPR Policy is approved by the Management Committee of The Holt Community Centre.

Date approved: _____

Review date: _____

Signed (Chair / Authorised Person): _____