



Hale Community and Youth Centre

2026/27 Privacy/Data Protection Policy & Procedures

1. Introduction

Hale Community and Youth Centre is committed to protecting the rights and privacy of individuals. We collect and use personal data to carry out our charitable purposes, manage the Community and Youth Centre, deliver services, run events, administer bookings, manage staff and volunteers, and undertake fundraising.

We are registered in England as a charity (1132822) and as a charitable company limited by guarantee (06872992). Hale Community and Youth Centre is the **data controller** for all personal data we process.

Any questions regarding this policy or our privacy practices should be sent to the Centre Manager at manager@halecommunitycentre.org.uk or by writing to:

Hale Community Centre
130 Upper Hale Road
Farnham Surrey GU9 0JH

2. Purpose of this Policy

This policy sets out Hale Community and Youth Centre's commitment to protecting personal data and describes how we comply with:

- the **UK General Data Protection Regulation (UK GDPR)**
- the **Data Protection Act 2018**
- the **Data (Use and Access) Act 2025**
- guidance issued by the **Information Commissioner's Office (ICO)**

The trustees regard the lawful and correct treatment of personal information as essential to maintaining the confidence of those with whom we work.

3. Definitions

- **Personal Data** - Information relating to an identifiable individual, including names, contact details, photographs, financial information, digital identifiers, and communication records.
- **Special Category Data** - Sensitive information requiring additional protection, including health, ethnicity, religious beliefs, sexual orientation, and similar categories.
- **Processing** - Any operation performed on personal data, including collecting, storing, using, sharing, or deleting it.
- **Data Controller** - The organisation that determines how and why personal data is processed. Hale Community and Youth Centre is the data controller.

- **Data Subject** - Any individual whose personal data we process (e.g., hirers, donors, volunteers, staff, service users).
- **Charitable Purposes Soft Opt-In** - A lawful basis under the *Data (Use and Access) Act 2025* allowing charities to send electronic mail marketing about their charitable purposes without prior consent, provided legal conditions are met.

4. Lawful Bases for Processing

We process personal data under the following lawful bases:

- **Contract** – managing bookings, hiring agreements, staff contracts.
- **Legal obligation** – financial reporting, safeguarding, employment law.
- **Legitimate interests** – running the Hale Community and Youth Centre, managing events, volunteer coordination.
- **Consent** – where required for photographs, certain communications, or specific activities.
- **Charitable purposes soft opt-in** – sending electronic mail marketing about our charitable work, events, activities, and fundraising where legal conditions are met.
- **Vital interests** – protecting individuals in emergencies.

5. Charitable Purposes Soft Opt-In (New 2025 Rules)

Under the *Data (Use and Access) Act 2025*, Hale Community and Youth Centre may send electronic mail marketing about our charitable purposes without prior consent **if all legal conditions are met**:

1. The individual provided their contact details during an interaction with the Centre (e.g., booking, donation, event registration).
2. The communication relates solely to Hale Community and Youth Centre's **charitable purposes**.
3. The individual was given a clear opportunity to opt out at the point of data collection.
4. Every message includes a simple opt-out mechanism.

Individuals may opt out at any time by emailing info@halecommunitycentre.org.uk.

6. How We Use Personal Data

We use personal data to:

- manage bookings and hiring (Hallmaster)
- administer events and activities
- managing staff and volunteers
- run fundraising campaigns (JustGiving, CAF Donate, Stripe, Crowdfunder)
- manage finances (Xero)
- communicate with supporters, hirers, volunteers, and service users
- comply with legal obligations

- maintain organisational records
- ensure the safety and security of the Centre

7. Digital Systems and Data Storage

Hale Community and Youth Centre uses modern cloud-based systems to store and process personal data:

- **Microsoft 365** (Outlook, OneDrive, SharePoint, Teams)
- **Hallmaster** (bookings)
- **JustGiving, CAF Donate, Stripe, Crowdfunder** (fundraising)
- **Xero** (accounting)
- **Outlook distribution lists** (mailing)
- **Facebook Messenger, WhatsApp, Instagram** (communications)

All systems must be used in accordance with this policy and with appropriate security measures, including:

- multi-factor authentication (MFA)
- strong passwords
- controlled access permissions
- secure cloud storage
- restricted sharing settings
- regular audits of access rights

8. Data Retention

We retain personal data only for as long as necessary:

- Financial records: **7 years**
- Insurance-related records: **as required**
- Staff records: **indefinitely**, where legally required
- Volunteer records: **duration of involvement + 2 years**
- Booking records: **7 years**
- Photographs: **until consent withdrawn or no longer needed**
- Emails: **in line with retention schedule and operational need**
- Digital records: **reviewed annually and deleted when no longer required**

9. Data Subject Rights

Individuals have the right to:

- be informed
- access their data
- correct inaccurate data

- request deletion (where applicable)
- restrict processing
- object to marketing
- data portability
- complain to the ICO

Subject Access Requests (SARs) will be responded to within **one month**, following identity verification.

10. Data Sharing

We may share data with:

- local authorities
- funding bodies
- insurers
- HMRC
- law enforcement
- cloud service providers
- contractors supporting our operations

We will not share personal data for non-charitable purposes without consent.

11. Data Security

All trustees, staff, contractors and volunteers must:

- use secure cloud storage (OneDrive/SharePoint)
- avoid storing personal data on personal devices
- use MFA and strong passwords
- avoid sending personal data via unsecured messaging apps
- use BCC for group emails
- report any data breach immediately to the Centre Manager

12. Data Breaches

A data breach includes loss, unauthorised access, accidental disclosure, or theft of personal data.

All breaches must be reported immediately to the Centre Manager. Where required, the ICO will be notified within **72 hours**.

13. Photographs and Images

Photographs of adults may be used under legitimate interests or soft opt-in. Photographs of children require **written parental consent**.

At large events, notices will be displayed informing attendees that photographs may be taken.

14. Responsibilities

The Board of Trustees is responsible for ensuring compliance. The Centre Manager is responsible for operational implementation, training, supervision, and responding to enquiries.

15. Policy Review

This policy will be reviewed annually or sooner if legislation changes.

SPECIAL NOTES: The latest Hale Community and Youth Centre policies are available to download from our website - <https://www.halecommunitycentre.org.uk/who-are-we-2/policies/>