

Havering Singers Data Protection (GDPR) Policy and Procedures

Charity Registration Number: 294979

Policy Effective Date: July 2026

Next Review Date: July 2027

Data Protection Lead: Chair of trustees

1. Introduction & Purpose

As a registered charity, Havering Singers (the "Society") needs to collect and use certain types of information about the individuals who interact with us. These include current, past and prospective choir members, audience members, donors, soloists, the musical director, accompanists and trustees.

This policy ensures that the Society complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It outlines how we collect, handle and store personal data legally, fairly and securely.

2. Data Protection Principles

The Society is committed to processing data in accordance with the six core principles of GDPR. Personal data must be:

1. Processed lawfully, fairly and transparently.
2. Collected for specified, explicit and legitimate purposes (Purpose Limitation).
3. Adequate, relevant and limited to what is necessary (Data Minimisation).
4. Accurate and, where necessary, kept up to date (Accuracy).
5. Kept in a form which permits identification for no longer than is necessary (Storage Limitation).
6. Processed in a manner that ensures appropriate security (Integrity and Confidentiality).

2. Policy Review Framework and Version Control

To demonstrate compliance with the GDPR Accountability Principle, this policy must be systematically maintained and updated. Reviews fall under two categories:

2.1 Scheduled Regular Reviews

- **Annual Frequency:** This policy will undergo a comprehensive review by the Committee at least once every 12 months to ensure operational accuracy, update

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named personnel and verify that data retention timelines are being actively executed.

2.2 Triggered Event Reviews (Ad-Hoc)

This policy must be reviewed and updated outside the standard annual schedule without undue delay if any of the following occur:

- **Changes in Data Processing:** If the Society changes *how* it handles data, or introduces a new purpose for processing (e.g., launching a new ticket-selling vendor or publishing audience photography online).
- **Technological Shifts:** The adoption of new software, databases, or cloud storage solutions (e.g., transitioning material onto shared cloud systems like Google Drive or Dropbox).
- **Regulatory Updates:** Structural changes to data protection legislation, revised guidance issued by the Information Commissioner's Office (ICO), or legal requirements such as formalised internal complaints handling under data regulations.
- **Following a Data Breach:** If the Society experiences an authorised breach or a "near-miss," security protocols and policy definitions must be reassessed immediately.

2.3 Document Audit Trail

Version Number	Date of Review	Name of Reviewer	Key Changes Made	Next Scheduled Review
v1.0	2 nd June 2026	Sarah Luheshi	Creation of the draft document	Review of draft
V1.1	7 th June 2026	Trevor Marlow	Review of the draft document	Incorporate changes
V1.2	7 th June 2026	Sarah Luheshi	Final draft	Committee meeting

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Version Number	Date of Review	Name of Reviewer	Key Changes Made	Next Scheduled Review
V2.0	20 th July 2026	Committee	Policy Sign off	July 2027

3. The Types of Data We Collect

To run the Choral Society effectively, we hold different categories of personal data:

Category of Individual	Types of Data Collected
Choir Members	Name, address, email, telephone number, voice part (e.g., Soprano), subscription payment records, attendance logs, Gift Aid declarations, dates of birth / birthdays. Names and phone number of next of kin / emergency contacts of choir members.
Audience	Name, email, phone number, ticket purchase history.
Friends of the Choir	Name, address, email and possibly financial details / Gift Aid declarations.
Hired Professionals & Applicants	Name, email, phone number, CVs, cover letters, references, bank details for paying invoices, contractual / employment agreements (e.g., for Musical Directors, Accompanist). DBS certificates for Musical Director and Accompanist.
Guest Soloists	Name, email, phone number, performance biography, promotional photographs, dietary/accessibility requirements, bank details for fee payments, agent contact details (if applicable).

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Category of Individual	Types of Data Collected
Trustees	Name, address, email and contact details, DBS certificates.

4. Lawful Bases for Processing Data

We only process personal data where we have a valid lawful basis to do so:

- **Contractual Necessity / Pre-contractual Steps:** To manage choir memberships, process ticket sales, fulfil agreements with hired staff and soloists, or review prospective credentials prior to booking.
- **Legitimate Interests:** For the day-to-day administration of the choir (e.g., organising concert logistics, printing programs, marketing upcoming events).
- **Consent:** For sending emails regarding future concerts. This consent can be withdrawn at any time.
- **Legal Obligation:** To process Gift Aid claims with HMRC, maintain charity accounts, or fulfil statutory obligations regarding independent contractors.

5. Recruitment and Booking of Professional Musicians

When the Society recruits or books professional artistic roles, such as a Musical Director (MD), Accompanist, or Guest Soloists, we collect specific personal data to assess suitability, conduct auditions/interviews and finalise agreements.

5.1 Recruitment of the Musical Director and Accompanist

- **Data Collected:** Curriculum Vitae (CVs), cover letters, contact details, professional references and notes made by the audition panel / trustees and choir during interviews and trial rehearsals.
- **Storage & Access:** Access to applicant files is strictly restricted to the designated hiring panel. Electronic files must be stored in a dedicated, secure folder on a password-protected device or cloud drive.
- **Retention Period:** Application materials and panel notes for unsuccessful candidates will be permanently deleted or securely shredded 6 months after the post has been filled to allow for any process queries or runner-up offers.

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5.2 Hiring and Engagement of Concert Soloists

The Society engages independent guest soloists for public concerts, either booked directly or through professional agents.

- **Information Gathered:** For the purposes of contracting and concert delivery, the Society collects names, contact details, financial invoicing details, performance biographies and publicity headshots.
- **Consent for Publicity:** By submitting promotional photographs and biographies for use in concert programs, flyers, websites and social media marketing, the soloist (or their agent) provides consent for public distribution.
- **Special Category Data (Dietary/Accessibility):** If a soloist shares specific medical, health, or dietary requirements (e.g., for concert-day catering or venue accessibility requirements), this data is processed strictly to ensure their safety and comfort. It will be restricted only to relevant committee organisers and deleted immediately following the conclusion of the concert event.
- **Data Retention for Soloists:**
 - **Publicity Materials:** Biographies and headshots will be removed from active promotional use after the concert, though they may remain archived in historical digital concert programs for record-keeping purposes.
 - **Unbooked Inquiry Records:** If a soloist or agent submits an inquiry or quote for a concert but is not booked, their contact information and performance details will be deleted within 12 months unless they consent to remain on an artistic roster for future consideration.

6. Data Storage & Management for Hired Professionals and Soloists

Once an MD, Accompanist, or Soloist is formally contracted, their data is handled under strict security protocols appropriate for financial and personnel records.

6.1 Secure Storage of Personnel & Contractor Data

- **Contractual & Financial Records:** Signed contracts, letters of agreement, invoices and bank details provided for fee payments must be stored securely.
 - *Digital files* must be held on password-protected laptops / PCs, with access restricted solely to the Chair, Secretary and Treasurer.
 - *Physical papers* must be stored in a secure filing cabinet by a designated trustee or designated committee member.

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- **Data Minimisation:** The Society will only hold the necessary contact, professional and financial information required to fulfil the contract and process payments.

6.2 Ongoing Retention

- **Active/Regular Contractors:** Data is kept securely for the entire duration of the Musical Director's or Accompanist's tenure with the Society.
- **Post-Tenure & Post-Event Retention:** Following the conclusion of a soloist's engagement or the resignation of contracted person such as the MD, core financial records and contracts will be retained for 6 years following the end of the financial year they relate to, in order to comply with HMRC and UK accounting regulations. Non-financial personal data (e.g., private phone numbers or personal email threads) will be deleted within 12 months of their departure.

7. Practical Procedures for General Data Handling

7.1 Data Storage & Security

- **Digital Data:** Electronic files containing personal details (e.g., membership spreadsheets) must be stored securely on password-protected devices or secure cloud storage with access restricted only to authorised committee members.
- **Physical Data:** Paper records (e.g., physical Gift Aid forms, paper membership applications) must be kept in a secure, locked filing cabinet or box by the designated committee member.
- **Email Communication:** When emailing the entire choir, an audience mailing list, or multiple soloist agents, committee members must use the BCC (Blind Carbon Copy) field to prevent exposing individuals' email addresses.

7.2 Data Sharing

- The Society will never sell or share personal data with third-party marketing companies.
- Data will only be shared with third parties when strictly necessary to deliver our services (e.g., using platforms for concert tickets, or HMRC for Gift Aid).

8. Individual Rights under GDPR

All individuals whose data is held by the Society (including contracted staff, soloists and job applicants) have the right to look at, correct, limit, or request the complete deletion of the personal information we hold about them, subject to statutory legal holding requirements (such as financial records required by HMRC).

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9. Data Breach Procedures

A data breach is any unauthorised access, alteration, loss, or destruction of personal data (e.g., losing a laptop containing the member database, or accidentally sending a soloist's contract containing bank details to the wrong email recipient).

In the event of a breach, the Data Protection Lead will take immediate steps to contain it. If the breach is likely to result in a risk to individuals' rights and freedoms, the Society will notify the Information Commissioner's Office (ICO) within 72 hours.