

Mudeford Club Data Protection and Privacy Policy

Version 1.1 – 4th June 2018

Within this document, the word “we”, “our” or “the Club” refers to The Mudeford & District Working Men’s Club and Institute (Christchurch) Limited, trading as The Mudeford Club.

The Club aims to be as transparent as possible in terms of data storage and usage and, the document below represents what we believe to be a full and accurate picture.

What data do we collect and why do we collect it?

The data we hold can be divided into three categories: **staff data, member data and CCTV.**

Staff data

- Name, address, phone numbers, email address to facilitate normal business communications with staff members.
- Date of birth, national insurance number and details of all financial transactions between us and the staff member in order that we can comply with the law and fulfil our requirements in terms of taxation and National Insurance.
- Training and qualification data – to ensure staff have up to date training in relevant areas such as Health and Safety and Food Hygiene
- Disciplinary record – to satisfy the best practice requirements of our HR consultants and comply with employment law
- Any “vital interest” data the staff member wishes us to hold for example details of any allergies or medical conditions they have or persons to contact in the event of an emergency.

Member data

- Name, address, phone numbers, email address in order that The Club may contact you.

This will only ever be for Club related matters and this data will not be passed outside the Club, unless we are required to do so by law.

When a person applies for membership of the Club, their name and address will be displayed within the Club, for a period of approximately two weeks, in order that any existing member has the opportunity to object to the applicant’s suitability for membership. Should it be decided that the applicant should be declined membership, their details will be deleted once they have been informed of the

decision and any monies refunded.

We send occasional emails, to those that have chosen to give us their address, to advertise upcoming events etc. We will continue to use technology to contact members in this way and we aim to move to a situation where members may opt in or out of specific types of communication.

- Your date of birth. So that we can correctly ensure any age related benefits are passed on (e.g. reduced subscriptions for those over 65).
- Vehicle details in case we need to find the owner of a vehicle in the car park e.g. in the event of a faulty alarm or damage to the vehicle
- Members are allocated a door card. This will have a unique number that links the card to you on our computer system. The card can thus be returned to you if it is handed in having been lost
- All members are entitled to a "Till Card" – a card which is capable of holding credit to be spent at the bar (if desired) and which gives the bearer the member's discount on many drinks. In order to implement the credit system, details of every purchase are stored on computer in order to maintain the correct card balance and provide an audit trail in the event of any query. Stored data relating to previous consumption could be used to target advertising or special offers etc. to people who have been identified as consuming a given product
- Subscriptions data will be retained in order to maintain the Membership List and to ensure that only paid up members have active "Till cards"
- Sports and games data. Should you choose to take part in sports or games in the Club, then the relevant data may be captured and may appear within or outside of the Club e.g. darts results are available on the darts league's website and the press may print details. By agreeing to take part in sports or games, you are giving your permission for this data to be used in a reasonable way, consistent with established traditions.
- Disciplinary record. Should any member be required to attend a disciplinary hearing following a complaint against them, then details of allegations, evidence received, punishments imposed, any future conditions or limitations imposed on the member will remain on file for the period of their membership. If the nature of an upheld complaint involves violence or other illegal or antisocial activity then data may be passed to either the Police and/or the operators of the "Pubwatch" scheme or any other official bodies that might come into being with a similar related role in the future.
- Photographs and video recordings. Photographs or videos are often taken at Club events whether officially or by individuals ad hoc. Such photos or videos could be

used for publicity purposes (e.g. the Club website) but will not deliberately identify any individual without their prior permission.

- Any “vital interest” data you wish us to hold for example details of any allergies or medical conditions you have or persons to contact in the event of an emergency.

Anonymous demographic data (e.g. average age, percentage of female members, how many members under 30 etc.) might also be used to help the Club make decisions to better serve our membership.

We reserve the right to collect additional data, with your consent, in the future, as may be required. For example, we may decide to hold details of members with particular skills that would be willing to help the Club if required.

CCTV

The Club uses CCTV. We do this in order that we can:

- Deter inappropriate or illegal behaviour on our premises
- Reassure our members (many of them elderly) that we take their safety very seriously
- In the event of any incident, use the footage either for an internal disciplinary/grievance procedure or pass it on to the Police for investigation

This footage is only ever accessed in the event of an incident that might have disciplinary/grievance or legal consequences and no other use is made of the data.

What is the Lawful basis on which we hold data?

Staff data

Staff data is held under the Legal Requirement basis in order that we can comply with financial and employment laws and not be in breach of any training or certification requirements (e.g. food hygiene). Additional “Vital Interest” data may be held based on the wishes of the staff member.

Member data

When a person contacts the Club to enquire about membership, we will then contact them, only in pursuance of this enquiry, and not with general advertising material. We do this

under the lawful basis of Legitimate Interest.

When a person becomes a member, we would use their data under the Contractual Basis as they have entered into an agreement to join our Club and follow its rules.

Receiving Club information via email requires the member to opt in by providing the email address to us. In the future, we may use the Consent Basis to send members only information on specific items that they have opted into.

Additional "Vital Interest" data may be held based on the wishes of the member e.g. if they wish us to hold an emergency contact number.

CCTV

There is a Legitimate Interest for the Club to be able to protect its fabric and its members.

There is a Vital Interest on the part of the members who wish to relax in a safe environment, without threat of violence.

What are people told when they provide us with their data?

They will be directed to review this Privacy Policy on the Club website. A paper version will be made available to those who wish to receive it.

Where is the data kept and for how long?

Staff and member data is maintained on computers in the Club office. This office is locked at all times when empty and keys are issued only to those with a genuine need for frequent access. Computers are password protected.

At the time of writing, all electronic data is stored locally but the Club reserves the right to use cloud based storage, if appropriate, in the future.

Paper based records are also stored in the office in locked cabinets and some data, which might have to be retained for legal reasons, may be stored in other, locked locations within the Club.

CCTV data is stored on hard disc. The data is constantly being overwritten by new data and we believe there will never be any image stored that is older than three months. This data is not retained unless there is an incident in which case a video file may be downloaded onto a PC, memory stick or written to a DVD or other data storage device. The unit is password protected and that password is only revealed on a need-to-know basis.

Staff data will be retained as long as they remain employees of the Club. Thereafter, it will be necessary to retain data for tax reasons for a period determined by the UK Government (currently 7 years). After this point their data will be removed unless they have indicated that they wish us to retain it for the future (e.g. in case a staff member was willing to “fill in” in an emergency).

Member data will only be retained for as long as it is required by the Club.

Resignation of a member – in the absence of any ongoing issues (e.g. the member owing money to the Club) then their data will be removed as soon as is practicably possible with a maximum target time of two weeks.

Note that data stored regarding purchases a member may have made at the bar are controlled by the till system and may remain in place. We have no control over this behaviour.

Death of a member – if the member has a surviving partner then they will be offered the chance to take over the person’s membership and this process will usually involve the contact details we have stored. Naturally we would wish to give the surviving partner a period of grieving before approaching them on this matter. We might therefore retain a deceased member’s details for up to six months, during the execution of this process.

Lapsed member – the person has not made their annual subscription payment by the end of January. This is often not deliberate and may be caused by illness, holiday, work commitment or simply forgetting and members are frequently seeking to make payments that they forgot in January.

We also sometimes have the situation where a person completely forgets one year then turns up to pay subscriptions the following year. So we need to retain this data for longer than that. We will therefore keep details of potential lapsed members until the end of March the following year before deletion unless it is known for certain that the member does not wish to continue their membership.

Expulsion of a member – Should a member have their membership cancelled and a ban placed on them from entering the premises then their details will be retained on a list of excluded members, in order to make this information available to future Committees

Who do we share the data with?

We share data only in the following ways:

- Where we are legally obliged to do so e.g. tax information, request for information by the police or local or national government departments

- Sports and games data will be shared in a manner consistent with long established traditions e.g. data may be given to the press, League bodies, recorded in photographs or on trophies etc.
- Vital Interest data – we would pass on any known medical information to a medical professional, on your behalf, in the event of an emergency
- Photographs or videos might be used for publicity purposes
- Name and address data for new applicants for membership will be displayed for purposes of any existing member to veto the application should they consider the person unsuitable.

General policy

We will attempt always to retain the minimum amount of data about individuals and will attempt to remove any duplicate data we identify. When we no longer need data, we will remove it.

Digital data is deleted and backup copies deleted. Paper based data is either shredded in-house or passed to external companies for professional disposal.

We will ensure that any staff with access to data are familiar with our data policy and the privacy requirements on them.

We will limit access to private data to those that need it to go about their duties.