

SCHOLA

Cantorum of Oxford

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Privacy Policy: Schola Cantorum of Oxford

1. Purpose and scope

This policy provides a framework for ensuring that Schola Cantorum of Oxford meets its obligations under the General Data Protection Regulation (GDPR) and associated legislation [1] ('data privacy legislation').

It applies to all processing of personal data carried out for Schola Cantorum of Oxford's purposes.

'Personal data' means any information relating to an identifiable living individual who can be identified from that data or from that data and other data. 'Processing' means anything that is done with personal data, including collection, storage, use, disclosure and deletion.

More stringent conditions apply to the processing of special category personal data.

'Special category' means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or data concerning an individual's sex life or sexual orientation.

This policy should be read in conjunction with the Data Protection Statement.

This policy does not cover the use of personal data by members of Schola Cantorum of Oxford when acting in a private capacity.

[1] This includes all legislation enacted in the UK in respect of the protection of personal data as well as the Privacy and Electronic Communications (EC Directive) Regulations 2003.

2. Background

The processing of personal data is essential for Schola Cantorum of Oxford to exist. Without it, students cannot be admitted to the choir; donations cannot be processed; staff and trustees cannot be recruited; and events cannot be organised for alumni and friends.

We are responsible for handling people's personal information. By not handling personal data properly, we could put individuals at risk.

There are also legal, financial and reputational risks for Schola Cantorum of Oxford. For example, the Information Commissioners Office (ICO), which enforces data privacy legislation, has the power to fine organisations up to 4% of global annual turnover for serious breaches.

3. Principles

The processing of personal data must comply with data privacy legislation and, in particular, the six data privacy principles.

In summary, they require that personal data is:

- processed fairly, lawfully and in a transparent manner;
- used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, up-to-date;
- not kept for longer than necessary; and
- kept safe and secure.

In addition, a new accountability principle requires us to be able to evidence compliance with these principles.

4. Aims and commitments

Schola Cantorum of Oxford takes seriously its responsibilities under data privacy legislation. It recognises that the mishandling of an individual's personal data may cause them distress or put them at risk of identity fraud. As a result, it is committed to:

- complying fully with data privacy legislation;
- where practicable, adhering to good practice, as issued by the ICO or other appropriate bodies; and
- handling an individual's personal data in a careful and considerate manner that recognises the importance of such information to their privacy and welfare.

It seeks to achieve these aims by:

- ensuring that all individuals who process data for Schola Cantorum of Oxford's purposes are made aware of their individual responsibilities under data privacy legislation and how these apply to their areas of work.
- incorporating data privacy requirements into administrative procedures where these involve the processing of personal data, particularly in relation to the database Salesforce (the concept of 'privacy by design')
- investigating promptly any suspected breach of data privacy legislation; reporting it, where necessary, to the ICO; and seeking to learn any lessons from the incident in order to reduce the risk of reoccurrence.

5. Roles and responsibilities

Trustees

The Board of Trustees has executive responsibility for ensuring that Schola Cantorum of Oxford complies with data privacy legislation.

It is supported by its Data Protection Officer, who is responsible for keeping under review Schola Cantorum of Oxford's policies and compliance with legislation and regulatory requirements.

Data Protection Officer

The Data Protection Officer is responsible for

- monitoring internal compliance, advising on Schola Cantorum of Oxford's data protection obligations and acting as a point of contact for individuals and the ICO.
- responding to requests for advice from any individuals who process data for Schola Cantorum of Oxford;
- complying with subject access and other rights based requests made by individuals for copies of their personal data;
- investigating and responding to complaints regarding data privacy (including requests to cease the processing of personal data); and
- keeping records of personal data breaches, notifying the ICO of any significant breaches and responding to any requests that it may make for further information.

In fulfilling these responsibilities, the Data Protection Officer may also involve, and draw on support from, the Administrator and the Trustees.

All Individuals processing personal data for Schola Cantorum of Oxford

Anyone who processes personal data for Schola Cantorum of Oxford is individually responsible for complying with data privacy legislation and this policy. They must ensure that they:

- only use personal data in ways people would expect and for the purposes for which it was collected;
- use a minimum amount of personal data and only hold it for as long as is strictly necessary;
- keep personal data up-to-date;
- keep personal data secure;
- do not disclose personal data to unauthorised persons;
- complete relevant training as required;
- report promptly any suspected breaches of data privacy legislation, in accordance with the procedure in section 6 below, and following any recommended next steps;
- seek advice from the Data Protection Officer where they are unsure how to comply with data privacy legislation; and
- promptly respond to any requests from the Data Protection Officer in connection with subject access and other rights based requests and

complaints (and forward any such requests that are received directly to the Data Protection Officer promptly).

6. Breaches of data privacy legislation

Schola Cantorum of Oxford will investigate incidents involving a possible breach of data privacy legislation in order to ensure that, where necessary, appropriate action is taken to mitigate the consequences and prevent a repetition of similar incidents in future. Depending on the nature and severity of the incident, it may also be necessary to notify the individuals affected and/or the ICO. A breach will occur where, for example, personal data is disclosed or made available to unauthorised persons or personal data is used in a way that the individual does not expect.

All incidents must be reported to the Data Protection Officer at the earliest opportunity.

7. Compliance

Schola Cantorum of Oxford regards any breach of data privacy legislation, and this policy as a serious matter, which may result in disciplinary action. Depending on the nature of the breach, an individual may also find that they are personally liable (for example, it can be a criminal offence for a member of Schola Cantorum of Oxford to disclose personal information unlawfully).

8. Further information

Questions about this policy and data privacy matters in general should be directed to the Data Protection Officer at mail@schola-cantorum.net

9. Review and development

This policy will apply with effect from 25 May 2018. It will be reviewed during the 2018/19 academic year to take into account outstanding ICO guidance and the final form of national legislation underpinning the GDPR.