

**Soar Sound Data Protection, Privacy & Communications Policy**

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## **1 Document Information**

**Policy:** Soar Sound Data Protection Policy

**Version:** 2.0

**Ratified:** 9<sup>th</sup> March 2024

**Status:** Draft/Live

**Issued:** 5<sup>th</sup> March 2024

**Website Link:**

**Approved By Directors:** Yes

**Consultation:** None

**Equality Impact Assessment Completed:** No

**Distribution:** All individual members and group members' representative of the charity.

**Implementation Date:**

**Planned Review Date:** 4<sup>th</sup> March 2025

**Author:** Rob Watson (Operations Development Director of Soar Sound)

**Soar Sound's Safeguarding Officer:**

**Policy Validity Statement:** Policy users should ensure that they are consulting the currently valid version of the documentation. This document will be reviewed one year from its issue date.

**Approval:** The policy will remain valid, including during its period of review. However, the policy must be reviewed next year and afterwards at least once in every three-year period.

## **2 Introduction**

This policy sets out how Soar Sound will fulfil its statutory duties and responsibilities effectively, both within its own organisation, and for the affiliated groups and members that help with Soar Sound's not-for-profit vision and public purpose objectives.

### **2.1 Vision**

Soar Sound seeks to provide broadcast radio and other online and legacy media services that are not for private gain, with any surplus or assets used principally for the benefit of the community.

### **2.2 Objects**

The objects of the Company are to carry on activities which benefit the community and in particular (without limitation) to carry out radio broadcast and media production services that will benefit communities resident in Leicester and Leicestershire, and in particular, and without limitation, with a focus on public education, wellbeing, mental health, economic development and employment.

Soar Sound supports all services, projects and activities that meet our not-for-profit objectives, as above, through offering publicity in our Soar Sound radio service and other media services.

### 3 Purpose of the Policy

Soar Sound is committed to upholding the highest standards of data management as part of its community radio service. This includes the careful collection, secure storage, and responsible use of data related to our operations, encompassing communications on our station website, social media channels, business partnerships, advertising activities, and collaborative links. Our data handling practices are designed to ensure the accuracy of data and records concerning the material shared by Soar Sound, a requirement mandated by broadcasting regulation and the Ofcom licence that governs our service. This commitment supports our dedication to transparency, privacy, and the integrity of our service to the community.

The purpose of this policy is to ensure that members, volunteers, partners and clients privacy is protected, and every reasonable effort is taken to ensure members' information is kept secure and intact. This policy describes how we collect and use personal information about our members and also how and why we use data, how we store it and how individual personal preferences can be amended.

**General Data Protection Regulation (GDPR):** provides the legal framework that defines how personal information can be used. Soar Sound is fully committed to complying with the principles set out in GDPR and has a legal duty to protect any information we collect from our volunteers, stakeholders, partner organisations and members of the public.

This document summarises how we collect and use your data, including but not limited to:

- Personal information that is only used for the purpose for which we collect it.
- Only information that we need is collected.
- Personal information that is only seen by those who need it.

We will only disclose data when we have your consent, or where we are obliged to disclose personal data by law, or as expressly permitted under the GDPR (through contract; legal obligation, vital interests; public task; or legitimate interests).

- We will keep your information up to date.
- Inaccurate or misleading data will be corrected as soon as possible.
- Personal information is retained only for as long as it is required for the purpose collected.

- Your information will be protected from unauthorised or accidental disclosure.
- We will provide you with a copy of your personal information on request.
- These principles apply whether we hold your information on paper or in electronic form.

### 3.1 Changes to Data Held

If your personal details change, please help us to keep your information up to date by notifying us at: Maxxwave House, Hill Lane Close, Markfield, England, LE67 9PY.

### 3.2 What personal Data Does Soar Sound Collect?

- The data we routinely collect includes members' names, addresses, email addresses and phone numbers. We collect this data directly from our members when they join Soar Sound.
- For some of our members we may have additional information such as committee memberships, relevant qualifications and interests, and DBS checks. We will also keep information relating to disciplinary matters and sanctions.

### 3.3 What is This Personal Data Used For?

Soar Sound employs data in various compliant ways with their GDPR duties, including:

- i. **General Membership Administration:** Utilising members' data for the administration of membership, communication of information, and the organisation of events.
- ii. **Broadcasting:** Using contact details of advertisers, partner organisations, and contributors for the purpose of producing radio programmes broadcast across multiple platforms such as DAB, FM, and web streaming.
- iii. **Website and Social Media Engagement:** Managing contact details of volunteers, distributors, and contributors for Soar Sound and other media publications, enabling communication regarding publication dates and content contributions.
- iv. **Partnership and Collaboration:** Holding contact details of partners involved in community projects and groups to facilitate contributions to events and activities.
- v. **Regulatory Compliance and Transparency:** Ensuring that data collection and storage are accurate and compliant with broadcasting regulations and Ofcom licence requirements. This includes maintaining records essential for broadcasting and adhering to GDPR requirements for the protection of personal data.

- vi. **Communication Preferences:** Respecting individuals' rights to adjust their communication preferences, ensuring personal data is only used for its intended purpose and individuals have control over the processing of their data.

These practices reflect Soar Sound's commitment to GDPR compliance, ensuring that personal data is collected, used, and stored responsibly, securely, and transparently, aligning with their broadcasting and community service objectives.

### **3.4 Who is Your Data Shared With?**

- None of the information collected by Soar Sound is passed on to any other organisation, except where we have a statutory duty to provide information, such as to Ofcom.

### **3.5 Where Does This Data Come From?**

- If you are a member of Soar Sound, you will have provided your personal data directly to us when you joined or when you updated your record with us.

### **3.6 How is Your Data Stored?**

- This information is mainly stored in digital form on computers and in the form of written documents stored at Soar Sound's office.
- A named person will be responsible for ensuring compliance with the relevant laws and regulations.
- The person who is responsible for ensuring Soar Sound discharges its obligations under the GDPR is **TBC** (Secretary of Soar Sound).

### **3.7 How Long We Keep Your Personal Information**

- We only keep your personal information for as long as necessary to keep you updated with news and events.
- Your personal information will be deleted if you are no longer a member.

#### **4 You Have The Right To:**

- Change your communication preferences or restrict the processing of your personal data for specific purposes.
- Request that we correct your personal data if you believe it is inaccurate or incomplete.
- Access the personal data that we hold about you through a “subject access request”.
- Request that we delete your personal information.

In the interest of ensuring transparency and accountability in our data management practices, Soar Sound acknowledges the rights of individuals to have their concerns addressed regarding the handling of their personal data. Should there be any dissatisfaction with the way Soar Sound manages personal data, individuals have the right to contact the Information Commissioner's Office (ICO) in the United Kingdom. The ICO serves as an independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. We encourage individuals to reach out to us directly with any concerns; however, we respect the right to approach the ICO should they feel their data has not been managed in accordance with the data protection laws.

## **5 Monitoring and Reporting**

All responses and feedback about this policy will be fully recorded, and a report made to the Trustee Board on any issues dealt with via this procedure. A written record will be retained of all complaints.

Signed: Rob Watson

Position: Operations Development Director

Date: 9<sup>th</sup> March 2024

Review Date: 5<sup>th</sup> March 2025

Soar Sound