THE COPPED HALL TRUST
CHARITY REGISTRATION NUMBER 1065569/0
www.coppedhalltrust.org.uk

COPPED HALL TRUST

Data Protection Policy & UK GDPR Procedure

Document Owner: Board of Trustees
Scope: All Trustees, Volunteer Team Leaders, Volunteers, Bookkeepers, and Contractors
Last Reviewed: January 2026
Review Cycle: Annual

Purpose and Scope

The Copped Hall Trust is run entirely by volunteers, including the Board of Trustees. The Trust is committed to a policy of protecting the rights and privacy of individuals, including members of the "Friends of Copped Hall," volunteers, contractors, and Trustees, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Data Protection Contacts

For any enquiries regarding data protection, the UK GDPR, or to exercise your individual rights (such as a Subject Access Request), please use the following contacts:

- **Primary Contact (First Port of Call):**
    - Contact Role: Chairman of the Trust
    - Email: alan.cox@coppedhall.uk
    - Postal Address: c/o Copped Hall Trust, Stables Courtyard, Epping, Essex, CM16 5HS
- **Secondary Contact (Second Port of Call):**
    - Contact Role: Security Team Leader
    - Email: security@coppedhall.uk
    - Postal Address: Copped Hall Trust, Stables Courtyard, Copped Hall, Crown Hill, Epping, Essex, CM16 5HS
    - Escalation Use: Contact in the event the Chairman is unavailable, or for immediate physical data/CCTV security matters.

Lawful Basis for Processing Data

The Trust relies on the following lawful bases to collect and process personal data:

- Contractual Obligation: Processing "Friends of Copped Hall" membership details to manage fees and deliver membership benefits.
- Consent: Utilising Mailchimp to send news, marketing updates, and event notifications to the Friends.
- Legitimate Interests: Managing everyday volunteer scheduling, team coordination, internal operational communications, and operating Closed-Circuit Television (CCTV) systems to protect the Trust's premises, historical museum artifacts, grounds maintenance machinery, staff, and visitors from crime, theft, or vandalism.
- Vital Interests & Legal Obligation: Holding emergency contact (next of kin) and essential health data to ensure volunteer safety on-site.

Data Storage, Security, and Access Controls

Friends Membership Database

- Storage: Hosted securely in a password-protected cloud drive.
- Access Control: Restricted to the Membership Secretary, the Membership Chairman, and the IT Consultant. No other volunteers or external parties have access unless authorised by any one of the above named.

Volunteers Database (Digital and Paper Split)

- Digital Records: This database is securely password-protected and must only be accessed by Volunteer Team Leaders and the Board of Trustees for scheduling and operational purposes.
- Paper Records: Physical emergency contact sheets and health forms are locked in a secure filing cabinet within the Main Office.

Financial and Contractor Records

- Storage: Hosted on an encrypted, cloud-based accounting platform.
- Access Control: Restricted to the Bookkeeper, the Treasurer, and authorised external accountants and auditors.

CCTV Data Management

- Storage: Recorded footage is stored securely on a local digital video recorder (DVR) with restricted physical access.
- Retention: Footage is automatically overwritten after 30 days unless required for an ongoing legal or security investigation.

Authorised Access List

Access to the Trust's data is strictly limited to individuals with a verified operational or legal need. The following roles and appointed third-party professionals have authorised access to specific data sets:

- Board of Trustees: Strategic oversight, security investigations, and high-level management.
- Membership Secretary & Membership Chairman: Friends of Copped Hall database management.
- Volunteer Team Leaders & Security Team Leader: Volunteer scheduling, contact details, operational coordination, and emergency response management.
    - Security Contact Details: Address: Copped Hall Trust, Stables Courtyard, Crown Hill, Epping, Essex, CM16 5HS. Email: security@coppedhall.uk.
- Bookkeepers, Accountants, and Auditors: Financial transactions, membership fees, contractor invoices, and financial compliance.
    - Organization: Alwyns Chartered Accountants
    - Address: 3rd Floor, Crown House, 151 High Road, Loughton, Essex, IG10 4LG
- IT Consultant / Support: Technical maintenance, database security, cloud system administration, and the management and maintenance of the Friends database.
    - Organization: i-c-why consulting ltd
    - Website: i-c-why.com
- CCTV System Operators & Reviewers: Reviewing recorded footage and accessing the DVR system. This is strictly restricted to the Site Security Trustee, the Security Team Leader, and the Board of Trustees for security or crime prevention purposes.

Data Sharing and Commercial Policy

The Copped Hall Trust maintains a strict policy regarding the protection of personal information:

- No Commercial Selling: The Trust will never sell, rent, trade, or lease personal data to any third party for marketing or commercial purposes.
- Strict Third-Party Restrictions: External access to data is forbidden, except where a formal legal obligation or essential operational necessity exists.

- Authorised External Access: Data may only be shared with verified professionals bound by confidentiality agreements, specifically:
    - Accountants and Auditors: For statutory financial reporting and independent examination.
    - IT Support Services: For secure data storage maintenance and system troubleshooting.
    - Legal Authorities: Only if strictly required by law (e.g., HMRC for Gift Aid or police for CCTV investigations).

Data Ownership and Jurisdiction

- Retention of Ownership: All data collected by the Trust remains under the exclusive ownership of the Copped Hall Trust. It will not leave our formal ownership at any point.
- Geographic Boundaries: Data is stored within secure UK-based cloud servers or physical on-site storage. It will not be transferred outside the UK GDPR jurisdiction without explicit legal safeguards.

Individual Rights and Requests

The Trust respects and upholds all rights granted to individuals under the UK GDPR:

- Right of Access: Individuals can request copies of their data via a Subject Access Request (SAR).
- Right to Rectification: Correcting inaccurate or incomplete records promptly upon request.
- Right to Erasure: Deleting personal data when consent is withdrawn or processing is no longer required.
- Response Time: All verified requests must receive a response within one calendar month free of charge. Any data-related complaint will be formally acknowledged within 30 days.

Data Breach Notification Procedure

A personal data breach involves the accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of personal data.

- Internal Reporting: Any volunteer or contractor who discovers a breach must report it immediately to the Board of Trustees.
- Risk Assessment: The Trustees will evaluate the risk level to the affected individuals' rights and freedoms.

- ICO Notification: If the breach poses a high risk, the Trust will notify the Information Commissioner’s Office (ICO) within 72 hours of discovery.
- Individual Notification: Affected individuals will be notified without undue delay if the breach risks their personal safety or financial security.

Retention and Disposal

- Membership Data: Kept for the duration of the membership plus 6 years thereafter to satisfy financial and legal audit requirements.
- Volunteer Records: Retained for 2 years following the volunteer's departure from the Trust.
- Safe Disposal: Paper files must be cross-cut shredded on-site. Digital files must be permanently deleted from all cloud systems and local recycle bins.

Appendix A: Website Privacy Notice Template

COPPED HALL TRUST – WEBSITE PRIVACY NOTICE

The Copped Hall Trust ("we", "our", "us") is committed to protecting your privacy. This notice explains how we collect, use, and store your personal data when you visit our website, become a member of the "Friends of Copped Hall," or volunteer with us.

Who We Are

The Copped Hall Trust is a registered charity run by volunteers. For the purposes of the UK General Data Protection Regulation (UK GDPR), the Trust Board of Trustees acts as the Data Controller.

- **Primary Contact (First Port of Call):**
  - Role: Chairman of the Trust (Email: alan.cox@coppedhall.uk)
  - Postal Address: c/o Copped Hall Trust, Stables Courtyard, Epping, Essex, CM16 5HS
- **Secondary Contact (Second Port of Call / Security):**
  - Role: Security Team Leader (Email: security@coppedhall.uk)
  - Postal Address: Copped Hall Trust, Stables Courtyard, Copped Hall, Crown Hill, Epping, Essex, CM16 5HS

The Data We Collect and Why We Collect It

- Membership Data: When you join the Friends of Copped Hall, we collect your name, address, email, and financial details to manage your subscription and deliver your benefits.
- Marketing & Newsletters: With your explicit consent, we use third-party platforms to send you updates about events and news. You can click the "Unsubscribe" link in any email to opt out at any time.
- Volunteer Records: We collect contact details, emergency contacts, and essential health information to coordinate schedules and ensure on-site safety.

- CCTV Imagery: We operate CCTV inside the Mansion and around our garden equipment containers to prevent crime and protect our historic heritage collections.
- IT Maintenance: Database and cloud administration are securely maintained by authorized third-party consultants. The Trust retains 100% data ownership at all times and never commercialises or sells personal records.

How Long We Keep Your Data

We only keep your information for as long as necessary:

- Membership Data: Kept for the duration of the membership plus 6 years thereafter to satisfy financial and legal audit requirements.
- Volunteer Records: Retained for 2 years following the volunteer's departure from the Trust.
- CCTV Footage: Automatically overwritten after 30 days unless required for an ongoing investigation.

Appendix B: Internal Data Breach Notification Form Template

COPPED HALL TRUST – DATA BREACH RECORD FORM

Section 1: Incident Overview

- Date & Time of Breach: _____
- Date & Time Discovered: _____
- Person Reporting the Breach: _____
- Description of the Incident: (Explain what happened, e.g., laptop stolen, email sent to wrong person, database corrupted)

Section 2: Data & Individuals Impacted

- Type of Data Involved:
  [ ] Membership Database
  [ ] Volunteer Records
  [ ] Financial / Cloud Accounting Data
  [ ] Special Category (Medical/Health)
  [ ] Other: _____
- Number of People Affected: _____

Section 3: Risk Assessment & Action Taken

- Immediate Containment Actions: (Explain actions taken to stop the leak, e.g., passwords changed, access revoked)
- Is there a risk to individuals?
  [ ] Low Risk (No action needed for ICO)
  [ ] High Risk (Requires immediate notification to individuals & ICO within 72 hours)

Section 4: External Reporting & Sign-off

- ICO Notified (Within 72 Hours if high risk): [ ] Yes [ ] No / Not Required
- Affected Individuals Notified: [ ] Yes [ ] No / Not Required
- Primary Sign-off (Chairman of the Trust):
  - Date: _____