

APPENDIX 4– DATA PROTECTION



Princes Street Easter Play 2005

Data Protection Procedures

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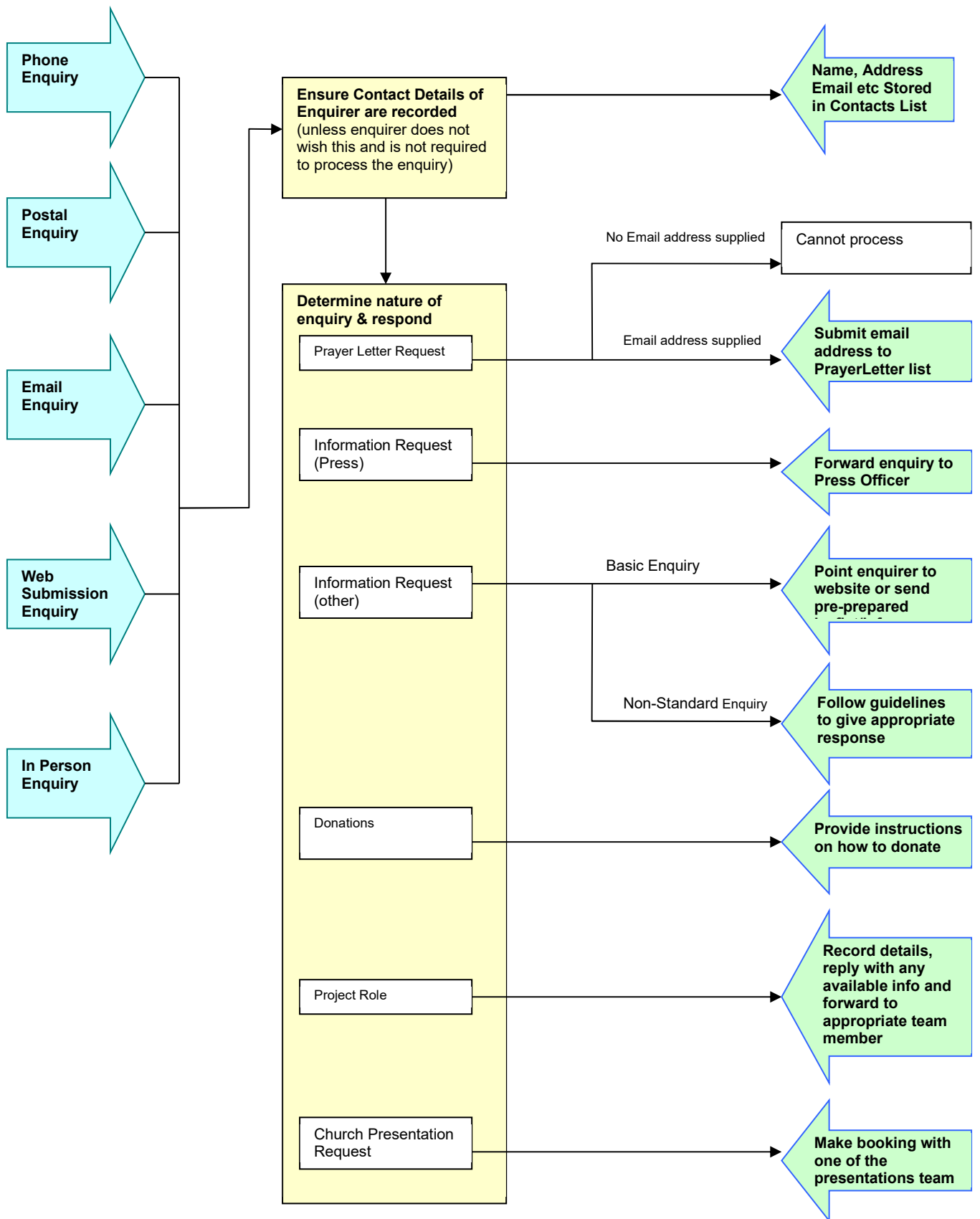
Date: 1st August 2005

Purpose of Document:

To outline the procedures for the handling of enquiries and personal data collected during the course of the Princes Street Easter Play 2005 project.

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Enquiries Process (diagram)



Recording of Information

What personal information do we record?

- Name
- Address
- Telephone Number
- Email Address
- Church affiliations

How is the information Stored and Kept in Good Order?

- The data is stored in a Microsoft Outlook database on
 - MASTER DATABASE (on Enquiries Co-ordinator's PC)
 - COPY (Project Laptop – held by Co-Producer: Logistics)
- Regular backups are taken and held on diskette at Master Database location
- Email Subscription Lists are maintained on the server of the Website Host Provider (Host Europe). Regular backups of the associated list of email addresses are taken, by copying & pasting the lists into an Excel spreadsheet on the Enquiries Co-ordinator's PC.

Who is allowed access to this information?

Trustees, Data Protection Officer and other individuals nominated by the Trustees for the purpose of handling enquiries.

How is this information kept securely?

- The passwords giving access to the PCs the database is stored on are restricted to only authorised personnel.
- Database backups are stored out of sight and not left lying around.
- Username and password for the Website Host only given to individuals by the Trustees for the purpose of handling enquiries.

How is this information entered/ updated?

Email addresses to be added to a Subscription List are added either on the contacts page of the website or in the control panel of the website host provider.

Contact details are added/updated/deleted in the Master Database. This database is then replicated to the Copy database(s). The process for updating the copy database will be as follows:

1. Backup the existing copy database
2. Delete all contacts from the database
3. Import the update from the Master Database
4. If the import from Master Database is successful, delete the backup created in 1. Otherwise re-import the contacts from this backup until a new Master Database update is supplied and this process re-run

Modes of Enquiry

- Phone
- Postal
- Email
- Web Submission
- In Person

NB The contact details for the project should be included on all project communications that it may be added to, eg on the website, leaflets, letterhead etc.

Phone

What is the phone number for enquiries?

01506 418368

What about phone calls to other numbers?

Details should be noted and passed to the Enquiries Co-ordinator.

What is said when the phone is answered by machine?

“I’m sorry no-one is available to take your call at the moment, so please leave your name, number and any message after the tone. If you are calling about Princes Street Easter Play please state the nature of your enquiry and your message will be forwarded to a member of the project team. Thanks for your call.”

NB The contact number is on shared line with a home number. Calls to the contact number are identified by a slightly different ring tone than is heard to calls to the home number. Calls can be diverted to a different number in the event of the line being busy or no-one being available to take calls. When the call is diverted, the receiver will hear no difference in the ring tone.

What level of service is expected to phone enquiries?

Answer machine messages are checked daily. It is aimed that a response, if required, will be sent to the enquirer by phone, email or letter within 48 hours.

When will the phone be answered in person?

No guaranteed time that this will occur.

How will this level of service be maintained during holidays and other absences?

Either calls will be diverted to an agreed number or an authorised person will remotely access the answer phone to check for messages.

This must be arranged in advance as much as possible, with confirmation that the stand-in person is fully aware that this will be happening and what to do.

What information is NOT given over the phone?

No personal information

- **If an enquirer wishes to check their details are correct, they should quote them over the phone to the contact person and NOT the other way around.**
- **The home/work contact details of project team members must not be given out unless they have expressly indicated they wish this and only for the purposes they intended this for. Enquiries can be sent into the project PO Box or enquiries email address and marked for the project team member's attention.**

What details of the phone call are noted?

- **Date time**
- **Who by**
- **Details of enquiry**

These are noted in a notebook, supplemented by notes in the journal facility of the Outlook Master Database

What about outgoing calls?

The outgoing number will be withheld due to the fact it would divulge a personal home number rather than the Project Contact number.

Calls will only be made within reasonable hours (9am-9pm). Calls will generally be made in the evenings and at weekends to minimise costs.

What do we do with anonymous/ crank/nuisance calls

Any such calls should be carefully noted with it clearly indicated that this was a "problem" call. Things to log are

- **Date & time**
- **Male or Female voice**
- **What was said**
- **Any background noises or other things of note**

If the call has caused the receiver distress they should call another member of the Steering Group for support. If the calls persist or one is particularly concerning then this should be reported to BT Nuisance Calls Helpline 0800 661 441 or advice obtained from the BT Malicious Calls AdviceLine 0800 666 700

Postal

What address should postal enquiries be sent to?

Princes St. Easter Play Trust
PO BOX 17283
Edinburgh EH12 9TF

What level of service is expected to mail enquiries?

The mail will be collected by named personnel on a rota basis. Currently the people on the rota are:

It will then be delivered to the Enquiries Co-ordinator for processing. It is aimed that a response, if required, will then be given to the enquirer by phone, email or letter within 48 hours. NB if the mail is a donation, this will be noted and forwarded to the treasurer to respond to as appropriate.

The Enquiries Co-ordinator will keep all received correspondence that is processed by her in a file.

What about postal enquiries sent to other addresses?

These should be forwarded to the Enquiries Co-ordinator so that they can be processed and so that contact details can be added to Master Database

What do we do with anonymous/ crank/nuisance letters

These should be kept and stored in a separate folder. The packaging should be kept as well as the letter. Both should be handled as little as possible.

A record should be kept of when such mail is received.

If the handwriting on an envelope or package seems to belong to a repeat sender of such material, the mail should not be opened.

Receipt of such mail should be flagged up to a member of the Steering Group and agreement reached of what action if any should be taken.

Email

What email address should enquiries be sent to?

enquiries@easterplay.org

What level of service is expected to email enquiries?

When an email is sent to enquiries@easterplay.org an Auto-Respond email is sent back saying that they should receive a response within 48 hours which is the expected response time for such enquiries.

Who will receive these emails sent to enquiries@easterplay.org?

Named individuals from the Steering Group. Currently:

Who is responsible for processing email enquiries?

Enquiries Co-ordinator: currently...

What happens when this person is on holiday?

Cover to process enquiries will be agreed in advanced with the other nominated recipients.

How often should email be checked?

Daily

What happens to the emails once processed?

A copy of all the emails will be kept on the Enquiries Co-ordinator's PC. This will be backed up to external storage on a regular basis.

What about emails sent to other addresses?

They should be forwarded to the Enquiries Co-ordinator using the address enquiries@easterplay.org

What do we do with suspicious/spam/crank/nuisance email

- Attachments should be scanned for viruses before opening.
- If the message appears to be general SPAM email then the email should be deleted and email address may be added to the SPAM filter on the website host control panel.
- If the message appears to be targeted to the project specifically (ie not auto-generated SPAM) then the email should be kept in a separate folder or archive. The messages can be reviewed to decide what action should be taken. Again,

the email address may be added to the SPAM filter on the website host control panel.

- **No reply should be given to any of these emails without the message being reviewed first.**

Web Submissions

How can a web submission be made?

Contacts page on the website <http://www.easterplay.org/Contact.html>

What level of service is expected to web submission enquiries?

Acknowledgement page and auto-respond email both indicating that a response should be given within 48 hours, which is the expected response time for such enquiries.

What information must an enquirer give to be able to submit?

- Name
- Email address

Who will receive the results of the submitted form?

Named individuals from the Steering Group. Currently:

Who is responsible for processing web enquiries?

Enquiries Co-ordinator: currently ...

How often should they check for new submissions?

Daily

What happens to the emails generated by web submissions once processed?

A copy of all the emails will be kept on the Enquiries Co-ordinator's PC. This will be backed up to external storage on a regular basis.

What do we do if the email address supplied is not valid?

Check that there is nothing else in the message that indicates the correct email address or who made the enquiry. If there is nothing clear then the email should be put into an "unknown" folder so it can be referred to if the enquirer gets back in touch.

What do we do with suspicious /crank/nuisance submissions

- **email should be kept in a separate folder or archived. The messages can be reviewed to decide what action should be taken. The email address may be added to the SPAM filter on the website host control panel.**
- **No reply should be given without the message being reviewed first.**

In Person

Who accepts such enquiries?

Any member of the project team potentially

Who processes them?

Enquiries Co-ordinator: Currently ...

What level of service is expected to in person enquiries?

The enquiry should be handled as far as possible during the conversation at the time. If the enquirer requires further information, their details should be noted and passed to the Enquiries Co-ordinator who will aim to give a response within 48 hours of receipt of the enquiry.

NB to take a note of these details the enquirer should be encouraged wherever possible to fill in the pre-printed form/leaflets. The enquirer should be encourage to give an email address so response can be given quickly and cost effectively.

What do we do with opposing/negative/hostile/aggressive

As much as is possible we should treat the person with respect and politeness. We acknowledge others points of view and will take note of any reasoned objections. The safety of trust members is paramount, therefore:

- Avoid going into potentially hostile environments alone.
- Do not get into an argument when provoked by objectionable statements.
- Stay calm and try to diffuse the situation.
- Do not give out any personal information.
- Try and signal for someone else to come or to seek assistance from another member of the trust.
- If the person is being continually harassing, physically threatening or makes physical contact then the assistance of security personnel should be sought (includes the police.)

Types of Enquiry

- Prayer Letter Subscription
- Information Request (Press)
- Information Request (Church/Individual)
- Donations
- Project Role
- Church Presentation

Prayer Letter Subscription

New Subscription Request

- Email address supplied :
submit email address on Contacts page (<http://www.easterplay.org/Contact.html>) so **subscribe** to the Prayer Letter. Enquirer will receive an email which they need to action to confirm their subscription. Alternatively the enquirer can go to the contacts page themselves.
- No Email address supplied:
For reasons of cost the prayer letter is distributed by email only. Ask for an email address. A suggestion might be that someone else could receive the email and then distributed it to other who are not online. **NB** the person has to consent to their email address being used in this way.

Unsubscribe Request

- Email address supplied:
submit email address on Contacts page (<http://www.easterplay.org/Contact.html>) to **unsubscribe** to the Prayer Letter. Alternatively the enquirer can go to the contacts page themselves.
- No Email address supplied
We require the email address to be able to complete the unsubscribe process. NB The prayer letter is distributed only by email.

Information Request (Press)

All press enquiries will be forwarded to the Press Officer.

Information Request (Other)

Basic Enquiry:

- Refer enquirer to website
- Send project leaflet preferably by email, if not post.

Non-Standard Enquiry:

Help/Money

We cannot provide such assistance. Sample answers are:

“Very sorry, but we are a charity and are not in a position to provide funds to any other organisation or individual.”

“Very sorry, but we are a charity for the production of the play and are not in a position to provide assistance to any other organisation or individual. You may wish to contact a charity which provides assistance in your particular area of need.”

Information on the Christian Faith

The caller will be pointed towards the following resources:

- Alpha Course:
Alpha International
Holy Trinity Brompton
Brompton Road
London SW7 1JA
0845 644 7544
www.alphacourse.org
info@alphacourse.org
- Christianity Explored:
www.christianityexplored.com
info@christianityexplored.com
- Two Ways To Live:
www.matthiasmedia.com.au/2wtl/

“Help I’m distressed”

Edinburgh City mission??

Personal Information about Project Team Members

Only published information is given out. This information is published with prior consent of the individuals named within.

Financial Information

Budgets, bank account details, sponsors/supporters names, contract information. Only published information is given out by the enquiries co-ordinator, provision of such information is handled by the Press Officer in conjunction with the Treasurer and Trustees.

Sales/Marketing Calls

The details will be noted and passed on to a relevant person if appropriate, however contact details other than the general enquiry line should not be given out.

What Details Do you Hold About Me?

This request must be made and completed in writing. Details should not be given over the phone. However if the enquiry provides the full information this may be checked against our records and confirmation given as to whether or not it is correct.

Comment

Statements of Belief/Comments on a Subject/News Story. If the enquiry is from an individual then an acknowledgement of their enquiry will be given without going into any details in response. If the caller still wishes a statement on these matters or the enquiry is from an organisation then they will be pointed to any published information, or the press officer.

Article Request

The Project Writer will produce articles suitable for including in church newsletter, magazine articles, newspapers etc. If the request is not fulfilled by any of the available articles, then the details will be passed to the Project Writer for consideration.

Donations

What forms of payment do we accept?

We can accept Cash and Cheque/Postal Order.

We cannot handle Direct Debit/Standing Order or Credit/Debit Card payments. If enquirers ask about this, the reason given is due to the administrative costs incurred. It should be pointed out that therefore 100% of what is given will go to the project.

Who should Cheques be made payable to?

Princes Street Easter Play Trust

How can cash payments be made?

At presentations

**What happens if someone hands cash or cheque to project team member?
They should note the details of the payment and forward the payment with these details to Treasurer, Stewart Inglis. This should be witnessed by another member of the project team.**

What acknowledgement will people receive of their payment?

In Person giving

- **Thanks and receipt if required**

By Post giving

- **Acknowledgement and receipt if required. NB this is only possible if a return address is supplied.**

Anonymous giving

- **No personal acknowledgement can be given. However a thank you will be sent to churches from where we know people have given.**

Project Role

The enquirer should be shown/given a copy of the information sheet on that particular role if one is available.

A note should be taken of the enquirer's contact details, when they enquired and what about. The enquirer's details and expression of interest should then be forward to the person within the project responsible for that area. This is decided upon by reference to the project's Organisational Structure chart. The enquirer should be made aware that this is what has happened.

Church Presentation

Information to be obtained from enquirers

- **Contact details of the enquirer**
- **Which church/organisation to they represent and what capacity.**
- **When would be a suitable time for the presentation**
- **Date and time of service/meeting**
- **What type of service/meeting is it?**
- **How many people are likely to attend?**

- **What facilities are there? Eg is there a projector for PowerPoint.**
- **Can we do our full presentation including financial appeal**
- **Where can we put a stall up and will there be a table available?**
- **How did you hear about us?**

The request will be acknowledged as soon as possible. As soon as suitable dates/times are known then the Presentations team will be approach to ascertain if someone is available. Once a date/time and presenter is found then confirmation will be given to the enquirer.

APPENDIX – PRIVACY POLICY

Privacy Policy

Our processes have been put into place to give you the information that you want to receive and allow you to submit to us the information you wish to give us.

Information about our Organisation and Web site

Organisation Name:	Princes Street Easterplay Trust
Address:	PO Box 17283
City, Zip:	Edinburgh , EH12 9TF
Country:	Scotland, UK
Data Controller:	Data Protection Officer
Web Sites(s):	www.easterplay.org

Our principal activity is: Charitable Organisation for the Purpose of Staging an Easter Play in Edinburgh

Our privacy policy covers Princes Street Easterplay Trust and its Web site:

Automated Collection of Information on Our Website

You can access our Web site home page and browse our site without disclosing your personal data.

We do not use cookies on our Web site.

We do not automatically log personal data nor do we link information automatically logged by other means with personal data about specific individuals.

We do access the web access statistic of our host provider to ascertain patterns of use. However, these statistics are summarized data and are not associated with any individual visiting our site.

Information You Give Us

We collect the personal data that you may volunteer while using our services.

We do not collect information about our visitors from other sources, such as public records or bodies, or private organisations.

Our Web site does not enable our visitors to communicate with other visitors or to post information to be accessed by others.

On our contacts page, you are asked to submit personal information about yourself (e.g. name and email address etc) in order to receive our prayer letter or enquire for further information about the project. By entering your details in the fields requested, you enable the Princes Street Easterplay Trust to provide you with the information you highlighted you are interested in. Whenever you provide such personal information, we will treat that information in accordance with this policy.

We do not knowingly collect personal data from children, and it is not our intention to do so. Should a child submit information to us we would only continue to hold this information with the parents consent to the use of the child's personal data for our internal use

We will only hold your information within our systems for the duration of the project, or until such time as you request your information no longer be held on our system.

We do not give visitors to our Web site the option of using a secure transmission method to send us their personal data.

We have implemented security policies, rules and technical measures to protect the personal data that we have under our control from:

- unauthorised access
- improper use or disclosure
- unauthorised modification
- unlawful destruction or accidental loss

All our employees and data processors, who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of our visitors' personal data.

In general any information you supply us will only be used within the context of the Princes Street Easterplay Trust and we will not supply to anyone outside our organization without first obtaining your consent. However please note that if you send offensive or inappropriate content to Princes Street Easterplay Trust, we reserve the right to use whatever information that is available about you to stop such occurrences. This may include the passing on of such information to third parties, such as your service provider.

Access To Your Information

You can ask us, by: sending an email (enquiries@easterplay.org) whether we are keeping personal data about you.

You may request a copy of personal information we hold about you and request to have any inaccuracies corrected. Please address requests to the Data Protection Officer PO Box 17283, Edinburgh , EH12 9TF For reasons of security we will only accept such requests in writing in this way. We will provide you with a readable copy of the personal data which we keep about you, within a month. We will provide the information at a charge of £10 which covers the administration costs of this process.

We allow you to challenge the data that we hold about you and, where appropriate, you may have the data:

- erased
- rectified or amended
- completed

We reserve the right to refuse to provide our visitors with a copy of their personal data, but will give reasons for our refusal.

We do, however, allow you to challenge our decision to refuse to provide you with a copy of your personal data.

If you have an enquiry or concern about our privacy policy, please contact: Data Protection Officer, Princes Street Easterplay Trust, Edinburgh , EH12 9TF Email:enquiries@easterplay.org

Website Terms of use

Our Commitment

It is our intention that there be continual, uninterrupted access to www.easterplay.org , however we do not guarantee this. We do not accept responsibility or liability for any downtime or interruption in service to the website.

The content of the web site is subject to change without notice.

Copyright: The contents of www.easterplay.org , remain the property of Princes Street Easterplay Trust. As well as the information contained in the text, this property includes the website's design, style and graphics. The contents of the web site may be downloaded printed or copied for personal use only. If you wish to reproduce any of the contents of the website for distribution to other parties, this must only be done with consent of the Princes Street Easterplay Trust. We would welcome all such an enquiries, which should be sent to enquiries@easterplay.org

It is our intention that as many people as possible are able to fully access www.easterplay.org However, we do not guarantee that the Princes Street Easterplay web site will be compatible with all hardware and software which may be used by visitors to the site. If you have any comments on the accessibility to www.easterplay.org please send them to webmaster@easterplay.org

Where the Princess Street Easterplay web site contains links to other web sites, we accept no responsibility or liability for the content of web sites which are not under our control.

All the information found on the Princes Street Easterplay web site is intended for guidance only. We will not be liable for any damage or loss caused as a consequence of action or inaction you undertake as a result of viewing, reading or listening to any of the content on www.easterplay.org

We will not be liable for damage to, or viruses that may affect, your computer equipment, software, data or other property as the result of your access to, use of or browsing of this website or your downloading of any materials, data, text or images.

Your Commitment

You must not use the website in any way that causes, or is likely to cause, the website or access to it to be interrupted, damaged or impaired in any way.

Any information and electronic communications that are sent from your computer to Princes Street Easterplay Trust are your responsibility.

You must not submit information to Princes Street Easterplay Trust which is harmful to persons or equipment. It should not contain anything which is abusive, indecent,

offensive, defamatory, threatening, or illegal. Any information you send to us should not infringe any copyright, trademark, privacy rights. You must not send us anything containing software viruses, or any sort of "spam" email. You may not send us chain letters or content for mass marketing or political campaigning. We reserve the right to take action to stop us receiving any such content.

You must not endeavor to impersonate any person or organisation, or otherwise mislead as to the origin of any information you submit to Princes Street Easterplay Trust. You must therefore not submit information that is not genuine, eg a false e-mail address. Please note that when an email address is submitted to the Prayer Letter subscription on our contacts page, this is not sufficient to activate the subscription. An email will be sent the email address stated giving further instruction on how to activate the subscription, if this action is not taken the email address in question will not be subscribed to the Prayer Letter distribution list.