

Data Protection Framework

1. Introduction

The Framework demonstrates the Hall's commitment to complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and guidance issued by the Information Commissioner's Office (ICO). It provides a structured governance framework to ensure that personal information is processed lawfully, fairly, transparently and securely.

2. Organisational Arrangements

The Howard Hall Memorial Hall is owned by the Durobrivae Lodge Benevolent Fund, a registered charity. The Howard Hall Sports and Social Club Ltd is the Charity's trading subsidiary that operates the licensed bar. Day to day management of the Hall is delegated to the Howard Hall Management Committee.

3. Framework Documents

The Framework consists of the following controlled documents:

- a. Data Protection (GDPR) Policy;
- b. Privacy Notice;
- c. Record of Processing Activities (ROPA);
- d. Data Retention Schedule; and
- e. Personal Data Breach Procedure (Appendix to the GDPR Policy).

4. Governance

Throughout the documents reference is made to the Howard Hall Memorial Hall, this includes the collective responsibilities of both the Durobrivae Lodge Benevolent Fund and the Howard Hall Sports and Social Club.

The Trustees have overall responsibility for ensuring compliance with data protection legislation. The Hall Secretary is responsible for maintaining the Framework, monitoring compliance, coordinating reviews and ensuring that the supporting documents remain accurate and up to date.

Committee Members who process personal information are responsible for complying with the Framework and reporting any actual or suspected personal data breach without delay.

5. Relationship between the Documents

The Data Protection (GDPR) Policy establishes the principles and responsibilities for processing personal data. Detailed security controls are contained within the GDPR Policy

The Privacy Notice explains to individuals how Howard Hall Memorial Hall collects, uses, stores and shares their personal information.

The Record of Processing Activities documents each processing activity undertaken by Howard Hall Memorial Hall together with its lawful basis, retention arrangements and security measures.

The Data Retention Schedule specifies how long each category of record is retained and how it is securely disposed of.

The Personal Data Breach Procedure provides the arrangements for responding to, recording and reporting personal data breaches.

6. Review

This Framework and all associated documents shall be reviewed at least every four years, or earlier where legislation, technology, organisational arrangements or processing activities change significantly.

Document Control

Document	Data Protection Framework
Applies to	Howard Hall Memorial Hall
Approved by	Howard Hall Management Committee
Approved on	25 th August 2026
Responsible Officer	Hall Secretary
Supporting Documents	Data Protection (GDPR) Policy; Privacy Notice; Record of Processing Activities (ROPA) and Data Retention Schedule
Version	Discussion Draft
Review	August 2030