



DATA PROTECTION POLICY

Stowmarket Youth Theatre(SYT) is a project of The ERD Connection, a charitable incorporated organisation and registered charity. This policy has been prepared by the Trustees of The ERD Connection and covers the activities of SYT.

Introduction

Stowmarket Youth Theatre (SYT) is fully committed to compliance with the requirements of the Data Protection Act 1998 (“the Act”) and the General Data Protection Regulation (“GDPR”), which came into force on 25th May 2018. SYT will therefore follow procedures that aim to ensure that all workers, employees, consultants, partners, volunteers or others who have access to any personal data held by or on behalf of SYT, are fully aware of and abide by their duties and responsibilities under the Act.

Statement of policy

To operate efficiently, SYT collects and uses information about people with whom it works. This may include:

- Past and present youth theatre participants (also referred to as ‘members’)
- Members of the public, including family of members, community members who engage with SYTs activities.
- Current, past and prospective practitioners, employees, sessional workers and volunteers
- Partners and funders, including individuals and private and statutory organisations.
- Suppliers SYT may be required by its funders to collect and use information to comply with stated funding requirements.

This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

SYT regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between SYT and its membership and those with whom it carries out business. SYT will ensure that it treats personal information lawfully and correctly. To this end, SYT fully endorses and adheres to the Principles of Data Protection as set out in the General Data Protection Regulation 2018.

Other Policies

The Data Protection Policy should be used alongside

- SYT’s Privacy Statement, which describes the data we collect, how we use it and how to report concerns around data use.
- SYT’s *Social Media Policy and
- Safeguarding Policy should also be referenced.

Training

All workers and volunteers will receive and be asked to familiarise themselves with SYT's Data Protection Policy, Privacy Statement and Social Media policy.

Data We Process

From Participants/Families:

We collect and use the following data to communicate with our participants and their families and to make sure participants receive the support they need to access our activities:

- Contact Details: including names, address, telephone, email and emergency contacts
- Monitoring Data: date of birth (age), gender, ethnicity
- Sensitive Data: additional needs (including disability, health, mental health and learning difficulties), additional support needs (including various barriers to accessing our projects), benefit entitlement
- Participation Information: including projects and sessions attended and evaluation feedback

Participants'/Families' information is currently stored in paper format in our office, electronic format on our computer systems and online through Google Forms.

From Staff, Freelance workers and Volunteers:

We may collect and use the following data to communicate with and manage our workers, run our payroll systems and to ensure the safety of our participants:

- Contact Details: including names, address, telephone, email and emergency contacts
- Monitoring Data: date of birth (age), gender
- Identity Documents: passport or right to work in the UK, Drivers' License number, DBS check
- Payroll Information: NI numbers, P45s, banking details
- HR Information: References, performance appraisal notes

Workers' information is currently stored in paper format in our office and electronic format on our computer systems.

From Partners and Members of the Public:

We may collect contact details (including name, role, organisation, address, telephone and email) from those who interact with SYT to communicate about our activities. This information is currently stored in paper format and in electronic format on our computer systems.

Photography/Video:

We take photos/video of participants and workers to record and showcase our activities. We retain photographic/video evidence of each project/activity, currently in perpetuity. This information is currently stored in electronic format on our computer systems and shared on our website, social media platforms and publications.

Information on how we use the data described above can be found in our Privacy Statement.

Data Processing by Outside Agencies

Any person or organisation processing data for SYT's administrative purposes (e.g. graphic designers, printers) or their own purposes (e.g. workers, funders or partners) must sign a Data Use Agreement that confirms their use of the data in compliance with SYT's Data Protection Policy.

Guidelines and Procedures

Anyone accessing or processing personal information must adhere to the following eight principles, taken from the General Data Protection Regulation 2018, which will ensure the information is:

1. Fairly and lawfully processed

Information gathered will only be used in accordance with these principles.

- Information will be gathered with the consent of the individual, or the individual's guardian (if the individual is under 16)
- SYT will state how the information will be used
- SYT will handle individuals' personal data only in ways they would reasonably expect.

2. Processed for limited purposes

Information gathered will only be used for SYT's charitable purposes

- As part of its charitable activities, SYT will use information gathered (including photographs/video) to report on its activities to funders.
- As a rule, SYT will not pass details on to other parties, including funders, that will allow the individual to be identified, except for photo/video evidence.
- If SYT is asked to pass on information that may identify an individual to other parties, including funders, SYT will always try to seek clear consent from the individual (or guardian if under 16) before passing on the information.
- In special circumstances regarding safeguarding or interactions with law enforcement, confidentiality may be broken. In emergency safeguarding situations or in certain interactions with law enforcement, we may need to pass on information without consent. See SYT's Privacy Statement for more information.
- SYT will share the details of staff, volunteers and partners with other workers in order to allow the smooth running of SYT's charitable activities.

3. Adequate, relevant and not excessive

SYT will collect information that will enable us to fulfil our charitable purposes, including information that will allow us to:

- Contact our members, partners, volunteers, staff, suppliers and community members
- Identify appropriate activities for members
- Assess the needs of members to ensure the well-being, safety and inclusion of all those who interact with SYT
- Assess demographic and equal opportunities data to help us monitor our effectiveness as an organisation.
- SYT will store member details in paper and electronic format through online/electronic database, registration forms, session registers, mentoring report forms and, if necessary, disclosure forms.

- SYT will store staff and volunteer details in paper format through contact sheets, contracts/agreements, staff details forms, applications and CVs.
 - SYT will store staff and volunteer details in electronic format through online/electronic database and electronic contact sheets.
4. Accurate and up to date
- SYT's database will be updated regularly to ensure information is current and correct.
 - SYT will issue registration forms at the beginning of each project to capture up to date details
 - The information of active members will be updated on the database at the start of each project.
 - The information of non-active members, partners, staff, volunteers, community members and suppliers on SYT's mailing list will be updated based on feedback received from individual feedback from contact list members.
5. Not kept for longer than is necessary
- SYT will store member details in paper format during the time that members are active with SYT. Member information in paper format will be archived annually. Personal details will be destroyed from the archive after 5 years.
 - Information of staff and volunteers no longer active with SYT will be archived annually. Archived information will be destroyed after 5 years.
 - SYT will redact personal information from reports or disclosures after the individual has been out of contact with SYT for 3 years.
 - SYT will store members details in electronic format for 5 years from the last date that the member was in active communication with SYT. After 5 years, SYT will delete members' details from any database.
 - SYT will keep an electronic mailing list. Positive actions to join SYT through registration forms, volunteering and employment will be taken as an opt-in to this list.
 - SYT will clearly state when actions are deemed as an opt-in on lists and give a clear option to decline subscription. Details of how to be removed from this list will be clearly laid out at the bottom of each communication. Details of members, staff, volunteers, partners and community members will be retained on the mailing list unless they unsubscribe, or their contact details become invalid.
6. Processed in line with your rights
- SYT will process all data in line with individuals' statutory rights. More information on your rights can be found in our Privacy Statement.
 - SYT will respond to individuals' requests to access a copy of the information SYT holds, and to any objections to the processing of their own data, as required by law.
7. Secure
- Personal information in paper format will be stored in a locked office.
 - Electronic information will be stored on a password-protected database and a secure IT storage system, which only SYT staff can access.
 - SYT's Lead Producer, will be responsible for ensuring information security.

8. International

- When using resources that store data outside the European Economic Area, SYT will only use companies that have signed up to Privacy Shield or who otherwise comply with GDPR principles.

Internet Data

SYT confirms that the above guidelines apply to internet-based data, including emails and social media interactions. SYT asks all staff, whether full-time, part-time, contractual or freelance, and volunteers to abide by the following guidelines in terms of internet-based personal information.

- SYT staff, tutors and volunteers will not keep or use members' electronic or internet-based details (including social media accounts) in a personal capacity, or for purposes outside of SYT projects.
- Electronic personal details (including emails, electronically stored phone numbers, etc.) will be deleted from staff's personal communication devices on completion of the project.
- SYT staff, tutors and volunteers will not email, phone, text, Facebook or otherwise contact SYT members directly to promote or recruit for projects outside of SYT.
- SYT staff, tutors and volunteers will not 'Friend' or accept as a 'Friend' an SYT member onto their personal Facebook account, or otherwise connect with an SYT member on other social media sites.
- SYT will not share members' posts on SYT's organisational social media platforms unless the post relates to members' interaction with SYT as set out in the Social Media policy.

Please refer to the separate Social Media policy for more information regarding the correct use of online data.

COVID-19 and In-Person Activity During Covid-19 pandemic or similar

In the event of a pandemic SYT may share data including contact and attendance details with NHS Test and Trace, if asked to do so. Wherever possible, SYT will contact attendees directly if we are made aware of a positive case within a session group.

SYT will collect additional data to ensure the health and safety of participants and workers during in-person activity.

We will ask participants and staff to confirm:

- a) if they or anyone in their household have experienced any of the core symptoms of i.e. Covid-19 - in the last 10 days
- b) if they have been asked to self-isolate by NHS Test & Trace
- c) a reading of the person's temperature when attending the activity.

Any documentation of answers to these questions will be erased after 10 days from the final project session. Staff should securely destroy any paper copy registers with this information once details have been recorded electronically.

Remote Working

During the Covid-19 pandemic, offices were closed, and practitioners and workers worked from home. SYT realises that home / remote working is likely to continue in some form. To accommodate this SYT's documents will be accessible through a password-protected cloud platform. Workers must ensure that no documents with personal data are shared outside the organisation.

Whenever possible workers should use SYT computer and mobile phone devices when processing data. When this is not possible, workers should take the additional steps to ensure personal data is secure and SYT will use an appropriate online platform such as Google Drive.

Workers should refer to and follow SYT's Technology Usage policy for more detailed instructions regarding remote working.

Changes to Data:

Anyone whose data is processed by SYT can change their information or how that information is used at any time by contacting SYT liz@erdconnection.org.uk

Responsibilities:

Everyone who works with and for SYT is responsible for handling data lawfully, fairly and transparently. The following people are responsible for ensuring the overall integrity of the data protection processes at SYT:

Data Controller: Liz Downie, Lead Producer, liz@erdconnection.org.uk
Senior Information Rights Owner: (SIRO): ERD Connection Trustee

Please contact SYT for the SIRO's direct contact details.

Data Breaches:

If a breach of data protection laws occurs, this should be reported in the first instance to the SYT Data Controller, who will report the matter to the SYT SIRO.

If the Data Controller and SIRO believe that the breach has resulted in no material loss, they will record the incident in a data breach log, including information on steps taken to ensure the breach will not happen again.

If the breach results in material loss of data or to data subjects, the Data Controller will report the breach within 72 hours to the Information Commissioner's Office (ICO) by calling: 0303 123 1113.

Notes:

*SYT's Social Media policy and online and cloud working platforms are currently under review and details will be added to this policy once completed.

Policy dated: September 2023 Review date: September 2025