



**Data Protection Policy**

<b>Policy information</b>	
<b>Organisation</b>	<b>Dewsbury Arts Group ("The Group")</b>
<b>Scope of policy</b>	<p>The policy applies to all the Group's activities whether at its premises at The Artspace Lower Peel Street Dewsbury West Yorkshire and such other venues at which it shall exhibit, display or perform.</p> <p><b>The Honorary Secretary and Honorary Treasurer from time, currently Jaqueline Millard Fletcher and Christopher Ward, act as Data Processors on behalf of The Group.</b></p>
<b>Policy operational date</b>	
<b>Policy prepared by</b>	Christopher Ward, Susan Saville and Malcolm George Parkinson as a sub committee delegated by the main committee
<b>Date approved by Committee</b>	
<b>Policy review date</b>	[     ] and every three years thereafter.

<b>Introduction</b>	
<b>Purpose of policy</b>	<p>The reasons for this policy are:</p> <ul style="list-style-type: none"> <li>• To comply with the law</li> <li>• To follow good practice</li> <li>• To protect members, season ticket holders, staff and other individuals connected to the Group</li> <li>• To protect the Group</li> </ul>
<b>Types of data</b>	<p>During the normal course of its operations, the Group collects personal data about individual members, season ticket holders, staff, tradespeople and sponsors such as names, postal addresses, e-mail addresses, telephone numbers and (in the case of junior members) dates of birth. Sensitive data retained includes bank accounts and photographic images and that which may relate to disciplinary matters relating to any staff employed from time to time.</p>
<b>Policy statement</b>	<p>The Group is committed to:</p> <ul style="list-style-type: none"> <li>• compliance with both the law and good practice</li> <li>• the respect of individuals' rights</li> <li>• being open and honest with individuals whose data is held</li> <li>• providing training and support for members who handle personal data, so that they can act confidently and consistently</li> <li>• Notify the Information Commissioner voluntarily, even if this is not required</li> </ul> <p>The Group shall follow the guidance from ICO on when breaches should be reported as set out in the relevant section of the website below:  <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/">(https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/)</a></p> <p>The Group is also aware of the information on individuals' rights set out separately in the relevant section of the website below: <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/">(https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/)</a></p>
<b>Key risks</b>	<ul style="list-style-type: none"> <li>• information about data getting into the wrong hands, through poor security or inappropriate disclosure of information</li> <li>• individuals being harmed through data being inaccurate or insufficient</li> </ul>

<b>Responsibilities</b>	
<b>The Committee</b>	The Committee has overall responsibility for ensuring that the Group complies with its legal obligations.
<b>Data Protection Responsibilities</b>	<p>The Committee shall ensure that, by way of illustration, it:</p> <ul style="list-style-type: none"> <li>• reviews Data Protection and related policies</li> <li>• seeks advice on tricky Data Protection issues</li> <li>• ensures that Data Protection induction and training takes place as appropriate</li> <li>• notifies the ICO as required</li> <li>• handles subject access requests</li> <li>• can identify unusual or controversial requests for disclosures of personal data</li> </ul>
<b>Delegation</b>	<p>The committee may from time to time delegate to members tasks which require them to have access to personal detail. By way of example, a House co-ordinator will be asked to contact people by telephone or e-mail to assemble teams of people to do "front of house" jobs for a production or exhibition. A director or producer will need contact information to assemble a team to carry out all necessary onstage and back stage tasks. The co-ordinator/director/producer in those circumstances must be aware of the limits on the access to and use of the information given to carry out these functions.</p>
<b>Enforcement</b>	<p>The Data Processors are the only people with direct access to the Group's databases and all requests for information are addressed to them. No information is released without reference to them</p>

<b>Security</b>	
See also The Schedule annexed which outlines specific measures in pursuance of this policy.	
<b>Scope</b>	Data Security is primarily a Data Protection issue.
<b>Setting security levels</b>	The greater the consequences of a breach of confidentiality, the tighter the security should be
<b>Security measures</b>	The procedures of the Group are proportionate to its size and the nature of information held. The Data Collectors are responsible for adopting such procedures as the Group may from time to time consider appropriate to protect the data held
<b>Business continuity</b>	In the event of a change of Data Processor, for whatever reason, the replacement will be inducted by the Group in the necessary procedures.
<b>Specific risks</b>	There are limited situations when information held on the Group's databases is needed by anyone other than the Data Collectors. Bank details are required by the Treasurer from time to time but in no circumstances are they to be released. Similarly, photographic images may be held for publicity purposes and must not be released to a third party for any other purpose. Such a request should be treated with suspicion

<b>Data recording and storage</b>	
See also The Schedule annexed which outlines specific measures in pursuance of this policy.	
<b>Accuracy</b>	The Group delegates data collection to the Data Collectors who are expected to exercise their discretion and due diligence as to how information is taken accurately.
<b>Updating</b>	The Data Collectors are expected to employ a regular cycle of checking, updating or discarding old data.
<b>Storage</b>	There are no particular considerations about where specific information should be stored so long as it is secure. Personal information is retained by the Data Collectors digitally. Only they have direct access to it. The same applies to anyone to whom a task has been delegated.
<b>Retention periods</b>	The Data Collectors retain information long enough to comply with statutory requirements and ideally not beyond.
<b>Archiving</b>	There is no specific procedure for archiving or destroying data. If a request is made by an individual or organisation to destroy or delete data held by the Group in respect of that individual or organisation they can specify how that is to be done.

<b>Right of Access</b>	
<b>Responsibility</b>	The Data Collectors are responsible for ensuring that right of access requests are handled within the legal time limit which is one month
<b>Procedure for making request</b>	<p>Right of access requests must be in writing.</p> <p>Given the nature of the Group's activities and the limited nature of the information held, it is highly unlikely that formal written requests will be made. However, for the efficient carrying out of the group's activities, the Data Collectors are authorised to provide necessary contact information by way of illustration but limited to, directors, producers and house co-ordinators. (see the section on delegation). A request may come from the media in which case the individual concerned should be informed. No information must be supplied without the individuals express consent.</p> <p><a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/</a></p>
<b>Provision for verifying identity</b>	Where the Data Collectors do not know the individual personally their identity and authority must be established before handing over any information.
<b>Charging</b>	Information is provided free of charge.
<b>Procedure</b>	The Data Collectors supply information to, for example, directors, producers and house coordinators unprompted or by request to enable them to perform their functions.

<b>Transparency</b>	
<b>Commitment</b>	<p>On applying to be a member, season ticket holder or sponsor, individuals are advised</p> <ul style="list-style-type: none"> <li>• for what purpose data is being processed</li> <li>• what types of disclosure are likely and</li> <li>• how to exercise their rights in relation to the data</li> </ul>
<b>Procedure</b>	<ul style="list-style-type: none"> <li>• on the application form to become a member, season ticket holder or sponsor, with occasional reminders in the newsletter</li> <li>• on the web site</li> </ul>
<b>Responsibility</b>	The data Collectors have overall responsibility

<b>Lawful Basis</b>	
<b>Underlying principles</b>	GDPR requires the Group to record the lawful basis for the personal data ( <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/</a> )
<b>Opting out</b>	The Group acknowledges that people may wish to opt out of their data being used in particular ways. For example, they may not wish to be contacted on a regular basis or at all about performing front of house or back stage duties.
<b>Withdrawing consent</b>	There may be occasions where the Group has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn

<b>Employee training &amp; Acceptance of responsibilities</b>	
<b>Induction</b>	All Data Collectors and those who have access to any kind of personal data should have their responsibilities outlined during their induction procedures.
<b>Continuing training</b>	Any issues arising from the provision of information should be referred in the first instance to a data Collector who in turn may seek further guidance and authority from the Committee.

<b>Policy review</b>	
<b>Responsibility</b>	The Committee has responsibility for carrying out the next policy review
<b>Procedure</b>	The matter will be placed on the agenda for the meeting for the month immediately preceding the next review date.
<b>Timing</b>	A month prior to the required date

For more information, please visit the ICO website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

When using a third party data processor, please read the guidelines here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/contracts/>

## **THE SCHEDULE**

Below are set out the practical measures take by the Data Collectors to ensure that the Group's policy in respect of Security, Data Recording and Storage are carried out.

### **The Secretary**

1. Information such as membership applications and back up database are retained on the Secretary's personal computer and backed up annually.
2. Membership applications are received on paper or on line. Details are entered on the database. By way of acknowledgement, the applicant is contacted to confirm the accuracy of the details. If a paper application, it is destroyed once confirmation of accuracy is received.
3. The secretary can edit the drop box database and can as necessary, authorise access to it for particular task relating to the Group's activities such as membership and season ticket holder lists for the use of the booking manager.
4. The Secretary e-mails front of house co ordinators contact lists of those who have consented to be considered to help out. Hard copies printed off are destroyed once they have served their purpose.
5. The secretary e-mails directors contact lists of those who have consented to being considered for on stage, back stage and technical roles. Hard copies are destroyed when they have served their purpose.
6. Details of past members and season ticket holders are retained only if they have asked to be contacted again.
7. A directory is kept of other groups and societies, town hall and other venues etc. Generally, this information is in the public domain but is retained in a directory for ease of reference.

### **The Treasurer**

On occasion, the Treasurer for the Group may ask for details of a persons Bank account. The information needed is Sort Code, Account Number and name of account holder and is required for the purposes of reimbursing Members who have paid out approved expenses on behalf of the Group; refunds of any excess payments made by individuals; payments in respect of artworks sold at exhibitions and any other expenditure approved by the Committee that may occur from time to time.

No paper records are kept of these personal bank account details; they are recorded on the computer record system provided by our Bank (CAF BANK) and are accessible only by passwords. There are five Committee Members who possess Passwords, each of whom knows only their own password. Only the Honorary Treasurer has access to the complete records held by CAF BANK – the other four password holders are necessary to countersign payments made by DAG and have limited access to information. No employee of CAF BANK has access to the personal information recorded on the banks computer record.

Some of our Members have completed a Gift Aid Declaration in order that DAG as a Registered Charity, can claim the tax element of their donations or Membership Fees from HMRC. These Declaration Forms are currently kept by the Treasurer in a locked cabinet.

Any personal details held by the group will never be handed to third parties for any purpose, unless ordered to by Process of Law.