



# Stage One Youth Theatre

## DATA PROTECTION POLICY

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# 1. Introduction

This policy sets out Stage One Youth Theatre's ("the Charity") procedures for the collection, storage, use and sharing of personal data and data for electronic business to business communications.

We protect all personal information and adhere to all current data protection act legislation with respect to protecting privacy. Current relevant legislation is the Data Protection Act ("the Act"), the General Data Protection Regulations ("GDPR") and the Privacy and Electronic Communications Regulations ("PECR").

The GDPR defines "personal data" as any information relating to an identified or identifiable natural person (a "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The Charity is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

# 2. The Data Protection Principles

This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

- 2.1 Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- 2.2 Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered incompatible with the initial purposes.
- 2.3 Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- 2.4 Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
- 2.5 Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.

Personal data may be stored for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR to safeguard the rights and freedoms of the data subject.

2.6 Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

### 3. The Rights of Data Subjects

The Charity collects data from our members and from others who attend our weekly sessions, take part in our shows; staff (paid and voluntary), and partner organisations.

Information about members at Stage One Youth Theatre is held with the right of subject access, allowing any individual access to the information held about them. We understand that your personal information and privacy is important to you. We make every effort to ensure that the information you share with us is recorded accurately, retained securely, and used only according to your wishes. The GDPR sets out the following rights applicable to data subjects:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure (also known as the 'right to be forgotten').
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights with respect to automated decision-making and profiling.

We do not give out, sell, or trade our mailing list data with external organisations. The Charity has a duty of care over any data we collect and process. We are fully aware of the confidential nature of some of the data we hold, and as such we have created our Data Protection Policy to give staff (paid and voluntary) guidance on what is good practice when handling confidential and sensitive data.

All information held by The Charity is strictly for its own use. Information is not shared with any third party without prior consent of the data subject or unless there is a legal obligation to do so.

## 4. What is Data?

Data Protection legislation is concerned with the use of personal data, held on electronic systems, in paper filing and with online identifiers such as location data and cookies. Personal data is defined by the ICO as data that relates to a living individual who can be identified from that data and/or from other information in the possession of (or likely to come into the possession of) the data controller (Stage One Youth Theatre). Special categories of personal data refer to information that could be used in a discriminatory way, so needs to be treated with greater care than other personal data, for example, information about:

- Race or ethnic origin.
- Political opinion.
- Religious beliefs or other beliefs of a similar nature.
- Trade union membership.
- Physical or mental health or condition.
- Sexual life.
- Commission or alleged commission of any offence.
- Any proceedings for any offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.

## 5. What Data we collect

The Charity collects personal data from members and staff (paid or voluntary) relating to age, address, phone number, email and who to contact in case of an emergency. We also ask for Special Category data relating to physical or mental health conditions as well as any criminal convictions or court proceedings.

We hold information relating to incidents that have occurred within our weekly sessions or that could directly affect the running of our sessions. We also hold information on incidents that have occurred whilst at the Production Venue(s).

Personal Data from the audience is collected via online booking systems, online donations, e-newsletters, and Surveys.

Bank details from direct debits, fees paid, staff payments, artist fees paid, funding and other payments received.

Business to business data is collected in the form of email correspondence and can include names, job titles, email and place of work addresses and phone numbers.

We also take photographs and video footage of members and audience during rehearsals and shows. Verbal and written permission is sought for this and anyone not wishing to be photographed or filmed is asked to let us know in accordance with our Safeguarding Policy.

When we ask you to provide personal and/or special category information we will let you know why we are asking for this information, and how we will process your data. We will also direct you towards this policy.

## 6. How we process this data

The data we hold may be used to send you information via electronic means, in hard copy / printed form, by post or via telephone. These types of communications can include:

- Information for members relating to weekly sessions.
- Promotional or marketing information on upcoming productions, workshops, and other events.
- Opportunities to take part in partner organisation events.
- Information on our fundraising operations, including occasional requests to support our work.
- Volunteer, work experience and job opportunities.
- Other relevant communications directly related to the Charity.

Photographs and video footage is shared via our social networks, used on our website and for various Stage One Youth Theatre promotional documents.

## 7. Data Security

Anyone processing data on behalf of the Charity is made aware of the following:

- Hard copies of member and staff information is kept in locked files in a secure location requiring approved physical security.
- Any information that is transferred to an online data file is password protected.
- All Stage One Youth Theatre computers, mobile phones and tablets must have passcodes, screen-locks, and other such security.

- Ensure different passwords are used for work and personal email accounts and that these are not shared.
- Ensure that business to business emails sent to multiple people are done so using bcc and cc appropriately.
- To not click links in unknown (potentially phishing) emails from unknown sources.
- sensitive information pertaining to an individual and relating to their ability to fully engage in a Stage One Youth Theatre session, is only shared with the relevant staff members and where possible, with the individual's consent.
- No sensitive data is left unattended where it may be accessed by others such as on a computer screen or unattended file.
- Keep track of any personal data in transit by ensuring it is the sole responsibility of one person.
- Not use any free public wi-fi services with Stage One Youth Theatre computers, tablets, or mobile phones.
- Ensure no sensitive data is given over the phone or sent via email to someone outside of the Charity.
- When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it will be securely deleted. Hard Copy data will be shredded and securely disposed.

## 8. Data breach notification

All data breaches must be reported immediately to the Charity Committee and Trustees.

In the unlikely event of a data breach, such as lost files with member details or an electronic data hack we will inform those "Data Subjects" whose information has been compromised and inform the Information Commissioners Officer (ICO).

- Data Breach notifications shall include the following information:
- The approximate number of data subjects concerned.
- The approximate number of personal data records concerned.
- Details of the individual reporting the Breach including name and contact information.
- The Likely consequences of the Breach (if known)
- Details of the measures taken, or proposed to be taken, by the Charity to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

This information will be collected via our Data Security Incident Form.

## 9. Data Retention

The Charity shall not retain any personal data for any longer than is necessary considering the purpose(s) for which that data is collected, held, and processed. Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

When establishing and/or reviewing retention periods, the following shall be considered:

- The objectives and requirements of the Charity.
- The type of personal data in question.
- The purpose(s) for which the data in question is collected, held, and processed.
- The Charity's legal basis for collecting, holding, and processing that data.
- The category or categories of data subject to whom the data relates.

If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Charity to do so (whether in response to a request by a data subject or otherwise).

### Defined Retention Periods:

- Details of past members and staff (paid and voluntary) are retained in hardcopy form and are stored for one year before being destroyed (shredded). The exception to this would be photographs, video footage and data held in show programmes which will continue to be used by Stage One Youth Theatre as documentation of the company's work and history. However, should a request be made by a past member, staff, or volunteer to not use an image, every effort will be made to remove images and video footage from our online networks, website, and promotional materials.
- Employment records, incident reports and other sensitive data are stored for 7-years.
- The Charity email accounts are reviewed and cleared of obsolete data every 2-years. The exception to this is when a staff member leaves the Charity, in which case all data is deleted.