

21 Artists Data Protection and Responsible AI Policy

1) Purpose and Scope

This policy sets out how 21 Artists collects, uses, stores, shares, and safeguards personal data in line with the UK GDPR, Data Protection Act 2018, and PECR (for electronic marketing). It also sets standards for the responsible use of AI systems in our consultancy work.

Who this applies to: All staff, associates, contractors, volunteers, and interns handling personal data or using AI tools on behalf of 21 Artists.

Whose data we process:

- Organisations (client contacts, stakeholders, funders)
- Artists and creative practitioners
- Young people (including under 18s) and their parents/guardians
- Research participants (e.g., surveys, interviews, workshops)
- Our staff and contractors (associates, researchers, data analysts)

2) Roles and Responsibilities

Board/Directors: Accountable for compliance and resourcing.

Data Protection Lead (DPL)/DPO (if appointed): Oversees compliance, DPIAs, breach response, training, and data subject rights.

Project Leads: Ensure project-level compliance, lawful basis, DPIAs, and vendor management.

All Personnel: Must complete induction, follow this policy, and report incidents immediately.

Contact for privacy queries: info@twentyoneartists.com

3) Key Definitions

Personal Data: Any information relating to an identified or identifiable person.

Special Category Data: Sensitive data (e.g., health, race/ethnicity, religious beliefs, sexual orientation).

Processing: Any operation on personal data (collection, storage, analysis, sharing, deletion).

Controller/Processor: We act mainly as a controller; sometimes as a processor per client contract.

AI System: Any automated system that infers, generates, or predicts outcomes using data or models (including third-party tools).

4) Data We Collect and Typical Purposes

- Contact and professional info (name, role, email, organisation) – coordination, contracting, reporting
- Participation data (event registrations, attendance, feedback) – evaluation, project delivery
- Research data (surveys, interviews, recordings, transcripts) – insights, impact assessment
- Participant data (name [when over 18], parental consent [when under 18], safeguarding notes where necessary) – engagement, safeguarding, evaluation
- Financial and HR (bank details, right-to-work, payroll) – employment/contracting obligations

We only collect the data we need (data minimisation) and design projects with privacy by default.

5) Lawful Bases and Special Category Data

We process personal data under one or more of the following lawful bases:

- Contract (e.g., delivering consultancy work)
- Legal Obligation (e.g., tax, safeguarding)
- Legitimate Interests (e.g., programme evaluation, stakeholder management)
- Consent (e.g., optional research participation, marketing, use of quotes/photos)

Special Category Data (e.g., health, race/ethnicity) requires additional conditions and explicit consent. We avoid collecting special category data unless necessary and proportionate.

Children and Young People:

- Where online services collect data from children, parental consent is required if under 18 (for information society services).
- For offline arts participation/evaluation, we typically rely on legitimate interests or public task (if commissioned by a public body), plus explicit consent for special category data and for image/video use where appropriate.
- Safeguarding data is handled on a need-to-know basis with heightened controls.

6) Transparency and Individual Rights

We provide clear Privacy Notices at collection explaining our purposes, lawful bases, retention, sharing, and rights. Data Subject Rights are handled within 1 month unless complex:

- Access, Rectification, Erasure, Restriction, Objection, Portability
- Right to withdraw consent at any time (does not affect prior lawful processing)
- Right to complain to the ICO (Information Commissioner's Office)

Requests should be sent to info@twentyoneartists.com. We verify identity before responding.

7) Data Sharing and Processors

We only share data where necessary and lawful:

- Processors (e.g., survey tools, cloud storage using Sharepoint or equivalent, transcription, email, AI vendors) under written contracts with UK GDPR-compliant terms (including confidentiality, security, sub-processor control, assistance with rights, deletion/return at end).
- Clients/Commissioners: As per contract and privacy notice; we avoid sharing personal data unless required and justified.
- Legal/Safeguarding: Where legally required or to protect vital interests.

8) Security Measures

- Encryption at rest and in transit for cloud services
- Data segregation (project folders, role-based permissions)
- Secure-by-design workflows for research and evaluation
- Pseudonymisation/anonymisation where possible (especially for research outputs)
- Incident logging and response (see 11 below)
- Regular training (including phishing/AI safety)

9) Data Retention and Deletion

We keep data no longer than necessary for the purpose collected. We hold data for the duration of the project plus 6 months from project finish.

10) Research, Evaluation and Ethics

- Obtain clear participant information and consent where required; offer non-participation without detriment.

- Use pseudonyms for reporting unless explicit consent is obtained; aggregate where possible.
- Recordings/transcripts: restrict access, store securely, delete per schedule.
- Young people: age-appropriate explanations; parental/guardian consent where needed; safeguarding routes for disclosures.
- Complete DPIAs (Data Protection Impact Assessments) for higher-risk activities (special category data, children, large-scale profiling, new tech/AI).

11) Breach and Incident Response

All personnel must report suspected breaches immediately to meg@twentyoneartists.com.

Process (target timelines):

- Triage within 24 hours – contain, preserve evidence, assess scope.
- Risk assessment – likelihood/severity of harm to individuals.
- Notify ICO within 72 hours if risk to rights/freedoms is likely.
- Notify affected individuals without undue delay where high risk.
- Remediate (technical/organisational fixes), document and review.

12) Responsible AI Policy

12.1 Principles

We use AI to enhance operations while upholding:

- Creativity and human ingenuity
- Lawfulness, fairness, and transparency
- Purpose limitation and minimisation
- Security and accountability
- Human oversight and contestability
- Non-discrimination and inclusion
- Respect for IP and artists' moral rights

12.2 Approved Use Cases

- Drafting/admin support (summaries, organising data, scheduling prompts)
- Research assistance (literature scanning, initial coding—with human validation)
- Accessibility support (transcripts, language simplification)
- Closed loop AI tools- Claude and Paid version of Gemini

Any AI usage streamlines and organises what 21 Artists already does by human team members and is used only as a supportive tool.

Restricted/Prohibited:

- Uploading special category data to third-party AI tools unless strictly necessary, with explicit consent or applicable condition and enhanced safeguards.
- Inputting confidential or personal data into AI systems lacking UK GDPR-compliant processing terms, data localisation/transfer safeguards, and opt-outs from model training.
- Non-anonymised/pseudonymised usage before processing- removing direct identifiers whenever possible.
- Usage of open-source AI tools with any personal data or organisational IP
- There are no solely automated decisions

12.3 Human Oversight and Quality

- All AI outputs are reviewed by a competent human prior to use externally.

- Label AI-assisted content where material to audience understanding (e.g., “AI-assisted summary, reviewed by [name]”).

13) Training and Awareness

- Mandatory annual training on data protection, safeguarding, and responsible AI.
- Induction for new staff/associates.
- Refresher training following incidents or legal changes.

14) Complaints

Individuals can raise concerns via info@twentyoneartists.com. If unresolved, they may contact the ICO. We will cooperate fully with supervisory authorities and funders.

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