

GENERAL DATA PROTECTION REGULATION POLICY

Swindon Dance is committed to the protection of its staff, volunteers and user's data, privacy and the safe-guarding and regulation of all data it holds.

This Policy outlines the principles and procedures which should be followed by all staff (full or part time), of Swindon Dance. It is the responsibility for the regulation of any data held by the organisation.

All staff includes; Trustees and teachers who work for the Organisation whether on a permanent, temporary or freelance contract, or working as volunteers.

As our Data Protection Lead, Sophie Brewer, has overall responsibility for the day-to-day implementation of this policy.

Information management includes:

1. Privacy Policy;
2. Processing;
3. Consent;
4. Accuracy;
5. Security;
6. Retention of records policy;
7. Sharing with contractors / third parties;
8. Employee and contractor personal data arrangements;
9. Actions and monitoring.

Privacy

See the organisation's privacy policy, which complies to national GDPR guidelines. The policy is available on the Swindon Dance website. The policy is referenced on booking forms and on the online mailing list sign up form so that people are aware of the policy and how to access it. The policy lays out the organisation's commitment to fair and transparent processing of all personal data.

Conditions for processing

We will ensure any use of personal data is justified using at least one of the conditions for processing and this will be specifically documented. All staff who are responsible for processing personal data will be aware of the conditions for processing. The conditions for processing will be available to data subjects in the form of a privacy notice.

Justification for personal data

We will process personal data in compliance with all six data protection principles.

We will document the additional justification for the processing of sensitive data and will ensure any biometric and genetic data is considered sensitive.

Processing Personal Data

Swindon Dance uses Performance of Contract as the basis for processing personal data. This covers such areas as listed below:

- processing bookings;
- contacting people in the event of changes to the activity they have booked or cancellations;
- contacting parents/carers if their children haven't been collected or have had an accident;
- letting people know about upcoming activities that may interest them.

In addition to this Swindon Dance uses **Consent** to contact people for other purposes such as fundraising.

Swindon Dance does not have express consent for data mining, conducting wealth screening or producing fundraising plans based on investigating people via social media or other public outlets.

Consent

Consent criteria has been strengthened to comply with GDPR.

People need to give clear and unambiguous consent and be given clear information on how to withdraw their consent.

Bookers and enquirers are currently asked the following:

People booking via reception

ProVenue prompts reception to read/ask the following:

“Prior to finalising your booking, we would like to advise you that the details of transactions, including your name and address, will be held on our database to facilitate future bookings. We would also like to add your name and personal details to our marketing list so that we can keep you informed about future events, our charitable activities and future developments at Swindon Dance. If you would like to receive this information, please choose your preferred contact below: Email / Mail / Phone / Text

Customer contact preferences are recorded on ProVenue via tick boxes.

A 'Sign up to our mailing list' form has been introduced to capture people at other points or if there is insufficient time to add their preferences at the time of booking.

Online bookers

Customers booking online via ProVenue/Tickets.com will get the following screen:

‘Prior to finalising your booking, we would like to advise you that the details of transactions, including your name and address, will be held on our database to facilitate future bookings. We would also like to add your name and personal details to our marketing list so that we can keep you informed about future events, our charitable activities and future developments at Swindon Dance.

If you would like to receive this information, please tick the boxes below.

- *I agree to this use of my personal data*

We would also like to be able to share your data with other relevant Arts Council funded companies and organisations.

- *I agree to this use of my personal data'*

This information goes directly into ProVenue

Enrolment Forms

Customer details will be kept on file and on computer in case Swindon Dance needs to contact them and so The Organisation can send information about future classes etc. This information will not be sold to other organisations or shared with any individuals. The full Privacy Policy is available to view on the Swindon Dance website.

Swindon Dance will ask parents/carers to sign a consent form to give permission to use images/video of their children and asks adults to give verbal consent. Images/videos will not be taken without consent.

General line to go on CAT / Education /Qualifications booking forms

"Your details will be securely stored on file and on computer so we can contact you about the course/activity you have enrolled for.

All information given will be treated as confidential and will only be used for the purpose for which you have provided it. Medical information may be shared with class teachers to ensure your/your child's safety.

To see the full Privacy Policy go to <https://www.swindondance.org.uk/about-us/>"

Accuracy

In order to keep information up to date Swindon Dance will do the following:

- Ask enrolled bookers to confirm their details once per annum;
- Ask PAYGo bookers to update their details at the start of each new term;
- Use Mailchimp to send email campaigns
 - Bounces and unsubscribes are automatically recorded on the system

Reports are taken monthly to compare with ProVenue/booking system to ensure consistency. **Data portability**

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free.

Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Information Security

All members of staff, full or part-time are required to follow the following information security procedures:

- Hard copies of documents containing personal information should be stored in locked drawers/filing cabinets;
- Documents containing personal and sensitive information should not be left on desks unattended. All papers should be put into lockable desk drawers/cupboards when they are not being worked on;
- Excessive copies of documents should not be made as this increases the risk of accidental exposure/loss;
- Passwords must be strong and not shared.
- Lock screen/Log off:
 - when PCs are left unattended they should be locked by pressing Control, Alt and Delete
 - At the end of the working day all PC's should be logged off
- Password protection:
 - documents containing sensitive data should be password protected
- No personal data should be stored/transferred to personal devices;
- Data should not be taken out of the workplace on memory sticks;
- Secure methods should be used for data transfer such as Dropbox/WhatsApp which are secure and encrypted;
- The Information Security procedures should be communicated to freelancers and volunteers;
- Information such as media consent and medical information should be stored in one place. This will be in a locked cabinet in reception. Some groups with additional needs will also have their information stored in the Education and Development Team office to ensure quick access in the event of an emergency;
- The CAT records its student's emergency contact details and medical information on a spreadsheet in Secure Folders. Access to this will be limited to:
 - the reception team/ the CAT team
- Once personal information is no longer required it will be securely disposed of by shredding. Large amounts of personal data requiring shredding will be collected by a licenced secure disposal company who will provide a certificate.

Records Retention Periods

HR	
Employee records	6 years after the employee has left
Payroll data	3 years after the employee has left
Recruitment	Recruitment papers and application forms: 6 months
Students / CYP:	
Registers	at the end of the term they cover
Enrolment forms	Until they have not attended for 1 term
CAT enrolment forms	6 years (for DFE)
Media consent	1 year – then needs to be updated
Child Protection records	Local Authority uses 6 years after the last contact. Must be a compelling reason to keep any longer.

Health and Safety records	variable – advisable to keep everything
Accident reports	Statutory retention period: 3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21).

Data Sharing

Data will only be shared with trusted partners who can confirm they are GDPR compliant. The data sharing must be necessary in order for Swindon Dance to fulfil its 'Performance of Contract' or for 'Legitimate Interest'.

<u>Data Shared</u>		<u>Contractor</u>	<u>Purpose</u>	<u>GDPR Compliance</u>
Bookers personal information		Audience Finder	Analyse bookings – ACE agreement	✓
		Tickets.com	Process online bookings	Has robust Privacy Policy. Uses US servers Participates in EU-U.S. Privacy Shield Framework
		Other ACE funded organisations	Analysis of booker and to send marketing information	TBC. Data sharing agreements to be put in place with individual organisations
Bookers and mailing list sign ups	MailChimp	Sending out marketing emails		✓
Employee personal information	Dataplan	Processing payroll and pensions		✓
	Monahans	Advice and guidance on HR issues Secure portal (IRIS) used for sharing sensitive personal information		✓
	Co-operative Bank	Salaries and payments		✓
CAT student/parent information No personal data is shared	DfE	To process government grant applications		✓
	ISTD	Course enrolment and examinations		✓

DDP student personal data			
	Moodle	Access to course material and interaction with tutors and other students.	✓
Children's data – names, addresses, DOB	Swindon Borough Council	Child Licence applications	Sent as a password protected document via email. Reviewing is children's names can be replaced by reference numbers

Employee and contractor personal data arrangements

Employee and contractor data will be subject to the same rigorous data security as customer data. All staff and contractors will be written to advising of Swindon Dance's Privacy Policy as part of the second phase of GDPR compliance.

Subject access requests

Please note that under the Data Protection Act 1998, individuals are entitled, subject to certain exceptions, to request access to information held about them.

All subject access requests should be referred to the DPL. There are restrictions on the information to which individuals are entitled under applicable law.

Training

All staff will receive training on this policy. New joiners will receive training as part of the induction process. Further training will be provided at least every two years or whenever there is a substantial change in the law or our policy and procedure.

Training will cover:

- The law relating to data protection
- Our data protection and related policies and procedures.

Reporting breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. All actual, or potential breaches, must be reported to the DPL at the soonest opportunity.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under our procedures which may result in dismissal.