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Leaders in Dance - Data Protection Policy

Context and overview:

Policy prepared by: Katey Leader
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Introduction:
Leaders in Dance (LID) who manage Octagon Tappers, Somerset Youth Dance Company and Tiny Dancers, needs to gather and use certain information about individuals.

The individuals can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

Data protection law:
The General Data Protection Regulation (GDPR) came into force on the 25th May 2018, superseding the Data Protection Act 1998. Its purpose is to protect the 'rights and freedoms' of natural persons (i.e. living individuals) and to ensure that personal data is not processed without their knowledge, and, wherever possible, that it is processed with their consent. These rules apply regardless of whether data is stored electronically, on paper or on other materials.

1. Data Protection Principals
LID is committed to processing data in accordance with its responsibilities under the policy. The GDPR is underpinned by six important principles and require that personal data shall be:

A. *Processed lawfully, fairly and in a transparent manner in relation to individuals;*

B. *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 to be incompatible with the initial purposes;*

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C. *Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*

D. *Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;*

E. *Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as 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 in order to safeguard the rights and freedoms of individuals;*

F. *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.*

2. General Provisions

- This policy applies to all personal data processed by LID.
- The Responsible Person shall take responsibility for LID's ongoing compliance with this policy.
- This policy will be reviewed annually and updated accordingly in line with the current GDPR regulations.
- LID shall register with the Information Commissioner's Office as an organisation that processes personal data.
- Everyone who works for, or with LID has some responsibility for ensuring data is collected, stored and handled appropriately. Each personnel that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

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3. Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, LID shall maintain a Register of Systems. The Register of Systems shall be reviewed annually. Individuals have the right to access their personal data and any such requests made to LID shall be dealt with in a timely manner.

4. Lawful purposes

All data processed by LID must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests. LID shall note the appropriate lawful basis in the Register of Systems.

- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in LID's systems.

5. Data minimisation

LID shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This can include:

- Names of Individuals
- Postal addresses
- Email addresses
- Telephone Numbers
- Medical History
- Plus any other information relating to individuals.

6. Data Accuracy

The law requires LID to take reasonable steps to ensure data is kept accurate and up to date. It is the responsibility of all personnel who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible. To ensure this, the following steps will be taken:

- Data will be held in as few places as necessary and no unnecessary additional data sets should be created.

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- LID will make it easy for data subjects to update the information LID holds about them through regular communication.
- Data should be updated as inaccuracies are discovered. For instance, if an individual can no longer be reached on their stored email address, it should be removed from LID records.

7. Archiving/Removal of data

To ensure that personal data is kept for no longer than necessary, LID shall put in place an archiving policy for each area in which personal data is processed, and review this process annually. Personal data shall be retained for appropriate periods of time balancing legal obligations, with operational, heritage and privacy considerations.

8. Security

- LID shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, LID shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Data access requests from individuals should be made by email, addressed to the responsible person at kateyleader@hotmail.co.uk. LID will provide information in a commonly used electronic format.

Definitions:

Responsible Persons –
Katey Leader – Artistic Director, responsible for data protection within the organisation.

Register of Systems –
A register of all systems or contexts in which personal data is processed by the Organisation