**Gorse Hill Studios Creative Community**

**Privacy Statement**

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| **Issue** | **Page(s)** | **Issue Date** | **Additions/Alterations** | **Initials** |
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This privacy notice is to inform you how we collect and process your personal data.

If you have any questions, queries or are unhappy with how we collect and use your data, you can contact us by emailing Hello@gorsehillstudios.co.uk and we will try to resolve it for you. However, you do hold the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk/)).

It is vital that the information we hold about you is accurate and up to date. Please do inform us at any time if your personal information changes by emailing hello@gorsehillstudios.co.uk.

For the purpose of this policy data is defined as:

Information held on a computer

Information held in a relevant filing system (paper or otherwise)

Or neither of the above but is information as part of an accessible record

For the purpose of the Data Protection Act 1998 and the General Data Protection Regulations 2018, **Gorse Hill Studios, Cavendish Road, Stretford, Manchester, M32 0PR**

**POLICY STATEMENT**

Gorse Hill Studios is a charity youth organisation who set out to engage with young people and offer a place where they can express themselves freely within creative arts, these include:

Music

Drama

Dance

Art

Digital Arts

GHS are aware that every young person has unique needs, but also accepts that everyone has the right to express themselves in a friendly, safe environment. Everyone involved in the organisation is required to read this policy carefully and read any future updates.

**Introduction**

Gorse Hill Studios is committed to complying with the requirements of the Data Protection Act 1998 and the eight principles within it, as set out below.

Eight Principles of the Data Protection Act 1998

1. Data must be obtained and processed fairly and lawfully

2. Data must only be collected and used for specified purposes

3. Data must be adequate, relevant and not excessive

4. Data must be accurate and up to date

5. Data must not be kept any longer than is necessary

6. Data must only be processed in accordance with the rights of data subjects

7. Data must be kept secure from unauthorised access, accidental loss or damage

8. Data must not be transferred outside the European Economic Area without adequate protection.

The Data We Hold

The types of information the organisations hold are:

* Organisational data – publicly available data about the organisation and some confidential data.
* Personal data – data on individuals such as name, address, job title, service accessed.
* Sensitive personal data – data held on employees and financial data relating to customers, suppliers and the work of the organisation.
* CCTV footage of public areas – this footage is recorded and retained for up to 7 days. Signs must be displayed.

To comply with the Act and carry out its responsibilities we will:

**1. Keep Data Secure**

All Gorse Hill employees are responsible for ensuring that:

Any personal data they hold, whether in electronic or paper format, is kept securely.

Personal data is not disclosed deliberately or accidentally either verbally or in writing to any unauthorised third party.

Personal data will be: Kept in a locked filing cabinet, drawer, or safe and if it is computerised;

Be coded, encrypted or password protected on a local hard drive and on a network drive, both of which are regularly backed up

**2. Dispose of personal data appropriately**

Data will only be kept for as long as is necessary by law or under the terms of funding agreements and will be reviewed on a regular basis. Normally data will not be held for more than 7 years.

Records containing personal data will be disposed of as follows:

All paper documentation containing personal data will be permanently destroyed, e.g. by shredding

All computer equipment or media that are to be sold or scrapped will have all personal data completely destroyed (and a certificate of destruction obtained)

**3. Ensure that data is only used for the purpose for which it is collected**

When collecting data we will make clear:

* What data must be supplied and which is optional
* Why we are collecting the data
* What use will be made of the data
* How long that data is stored for

**4. Disclose data appropriately**

Individuals have the right to request a copy of any personal data that we hold about them in accordance with Information Commissioners guidance. (ICO) You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

We will ask individuals for permission, before disclosing their personal details to third parties, where the use is different to that already agreed on collection. Except where we have legal concerns or the safety of a child or young person is at risk.

CCTV footage will be disclosed to the individual where they are the only person in the footage, in all other circumstances CCTV footage will only be disclosed to police or similar statutory authority. Disclose to police will be made by the senior managers.

**5. Training and Review**

This policy will be subject to regular review to reflect changes to legislation or to our organisational structure or policies. The Trustees will carry out an annual review of our data protection policy and procedures.

All employees, volunteers and Trustees are expected to apply the policy and to seek advice when required. All new employees, volunteers and Trustees will be given training on the data protection policy and procedures.

**6. The Use of Photographs / Video / Images**

For any individual aged under 18 (25 with disability) we will always seek written consent from a parent/carer before displaying photographs in which they appear on our premises, promotional material or website.

Where practicable, we will seek the consent of members / clients who are aged 18 (25 with disability) and above before displaying photographs in which they appear on our premises, promotional material or website.

If this is not possible (for example, a large group photo), we will remove any

photograph if an individual makes a complaint.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for or to satisfy any legal or contractual requirement.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purpose for which we process your personal data and whether we can achieve those purposes through other me ans, and the applicable legal requirements.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to :

Request access to your personal data

Request correction of your personal data

Request erasure of your personal data

Object to processing of your personal data

Request restriction of processing your personal data

Request transfer of your personal data

Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email Hello@gorsehillstudios.co.uk

Gorse Hill Studios Creative Community Data Controller, Caroline Gleaves