



## Lewisham Youth Theatre

### Data Protection Policy

#### Introduction

Lewisham Youth Theatre (LYT) is fully committed to compliance with the requirements of the Data Protection Act 1998 (“the Act”) and the General Data Protection Regulation (“GDPR”), which came into force on 25<sup>th</sup> May 2018. LYT will therefore follow procedures that aim to ensure that all employees, consultants, partners, volunteers or others who have access to any personal data held by or on behalf of LYT, are fully aware of and abide by their duties and responsibilities under the Act.

#### Statement of policy

In order to operate efficiently, LYT collects and uses information about people with whom it works. This may include:

- Past and present youth theatre participants (also referred to as ‘members’)
- Members of the public, including family of members, community members who engage with LYT’s activities
- Current, past and prospective employees, sessional workers and volunteers
- Partners and funders, including individuals and private and statutory organisations
- Suppliers

LYT may be required by its funders, including but not limited to the London Borough of Lewisham, to collect and use information in order to comply with stated funding requirements. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

LYT regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between LYT and its membership and those with whom it carries out business. LYT will ensure that it treats personal information lawfully and correctly.

To this end, LYT fully endorses and adheres to the Principles of Data Protection as set out in the General Data Protection Regulation 2018.

**Other Policies:** The Data Protection Policy should be used alongside LYT’s Privacy Statement, which describes the data we collect, how we use it and how to report concerns around data use. LYT’s Social Media Policy and Safeguarding Policy should also be referenced.

**Training:** All workers and volunteers will receive and be asked to familiarise themselves with LYT’s Data Protection Policy, Privacy Statement and Social Media policy. All hired/placed

workers and volunteers will undergo an induction at the beginning of their engagement, with specific training in data protection.

**The Data We Process from Participants/Families:** We collect and use the following data to communicate with our participants and their families and to make sure participants receive the support they need to access our activities:

- **Contact Details:** Including names, address, telephone, email and emergency contacts
- **Monitoring Data:** Date of Birth (Age); Gender; Ethnicity
- **Sensitive Data:** Additional needs (including disability, health, mental health and learning difficulties); Additional support needs (including various barriers to accessing our projects); Benefit entitlement
- **Participation Information:** Including projects and sessions attended and evaluation feedback

Participants'/Families' information is currently stored in paper format in our office, electronic format on our computer systems and online through the Substance Views database.

**The Data We Process from Staff, Freelance workers and Volunteers:** We may collect and use the following data to communicate with and manage our workers, run our payroll systems and to ensure the safety of our participants:

- **Contact Details:** Including names, address, telephone, email and emergency contacts
- **Monitoring Data:** Date of Birth (Age); Gender;
- **Identity Documents:** Passport or right to work in the UK; Drivers' License number; DBS check;
- **Payroll Information:** NI numbers, P45s, banking details
- **HR Information:** References, performance appraisal notes

Workers' information is currently stored in paper format in our office, electronic format on our computer systems and online through the Xero bookkeeping/payroll system and Google Docs.

**The Data We Process from Partners and Members of the Public:** We may collect contact details (including name, role, organization, address, telephone and email) from those who interact with LYT to communicate about our activities either directly or through our newsletter.

This information is currently stored in electronic format on our computer systems and online through Google Docs and Mailchimp.

**Photography/Video:** We take photos/video of participants and workers to record and showcase our activities. We retain photographic/video evidence of each project/activity, currently in perpetuity.

This information is currently stored in electronic format on our computer systems and shared on our website, social media platforms and publications.

Information on how we use the data described above can be found in our Privacy Statement.

**Data Processing By Outside Agencies:** Any person or organization processing data for LYT's administrative purposes (e.g. graphic designers, printers) or their own purposes (eg workers,

funders or partners) must sign a Data Use Agreement that confirms their use of the data in compliance with LYT's Data Protection Policy.

## **Guidelines and Procedures**

Anyone accessing or processing personal information must adhere to the following eight principles, taken from the General Data Protection Regulation 2018, which will ensure the information is:

### **1. Fairly and lawfully processed**

- Information gathered will only be used in accordance with these principles.
- Information will be gathered with the consent of the individual, or the individual's guardian (if the individual is under 16)
- LYT will state how the information will be used
- LYT will handle individuals' personal data only in ways they would reasonably expect.

### **2. Processed for limited purposes**

- Information gathered will only be used for LYT's charitable purposes
- As part of its charitable activities, LYT will use information gathered (including photographs/video) to report on its activities to funders.
- As a general rule, LYT will not pass details on to other parties, including funders, that will allow the individual to be identified, with the exception of photo/video evidence.
- If LYT is asked to pass on information that may identify an individual to other parties, including funders, LYT will always try to seek clear consent from the individual (or guardian if under 16) before passing on the information.
- In special circumstances regarding Safeguarding or interactions with law enforcement, confidentiality may be broken. In emergency safeguarding situations or in certain interactions with law enforcement, we may need to pass on information without consent. See our Privacy Statement for more information.
- LYT will share the details of staff, volunteers and partners with other workers in order to allow the smooth running of LYT's charitable activities.

### **3. Adequate, relevant and not excessive**

- LYT will collect information that will enable us to fulfill our charitable purposes, including information that will allow us to:
  - Contact our members, partners, volunteers, staff, suppliers and community members
  - Identify appropriate activities for members
  - Assess the needs of members to ensure the well-being, safety and inclusion of all those who interact with LYT
  - Assess demographic and equal opportunities data to help us monitor our effectiveness as an organisation.
- LYT will store member details in paper and electronic format through online/electronic database, registration forms, session registers, mentoring report forms and, if necessary, disclosure forms.
- LYT will store staff and volunteer details in paper format through contact sheets, contracts/agreements, staff details forms, applications and CVs.
- LYT will store staff and volunteer details in electronic format through online/electronic database and electronic contact sheets.

#### **4. Accurate and up to date**

- LYT's database will be updated regularly to ensure information is current and correct.
- LYT will issue registration forms at the beginning of each project to capture up to date details,
- The information of active members will be updated on the database at the start of each project.
- The information of non-active members, partners, staff, volunteers, community members and suppliers on LYT's mailing list will be updated based on feedback received from quarterly newsletters and individual feedback from contact list members.

#### **5. Not kept for longer than is necessary**

- LYT will store member details in paper format during the time that members are active with LYT. Member information in paper format will be archived annually. Personal details will be destroyed from the archive after 5 years.
- Information of staff and volunteers no longer active with LYT will be archived annually. Archived information will be destroyed after 5 years.
- LYT will redact personal information from reports or disclosures after the individual has been out of contact with LYT for 3 years.
- LYT will store members details in electronic format for 5 years from the last date that the member was in active communication with LYT. After 5 years, LYT will delete members' details from the Views database. If members have agreed to receive LYT newsletters, they will continue to remain on the newsletter mailing list unless they choose to unsubscribe.
- LYT will keep an electronic mailing list (currently through MailChimp). Positive actions to join LYT through registration forms, volunteering and employment will be taken as an opt-in to this newsletter. LYT will clearly state when actions are deemed as an opt-in to the newsletter list, and give a clear option to decline subscription. Details of how to be removed from this list will be clearly laid out at the bottom of each communication. Details of members, staff, volunteers, partners and community members will be retained on the mailing list unless they unsubscribe or their contact details become invalid.

#### **6. Processed in line with your rights**

- LYT will process all data in line with individuals' statutory rights. More information on your rights can be found in our Privacy Statement.
- LYT will respond to an individuals' requests to access a copy of the information LYT holds, and to any objections to the processing of their own data, as required by law.

#### **7. Secure**

- Personal information in paper format will be stored in a locked office.
- Electronic information will be stored on a password-protected database and a secure IT storage system, which only LYT staff can access.
- LYT's Executive Director, Victoria Shaskan, will be responsible for ensuring information security.

#### **8. International**

- When using resources that store data outside the EEA, LYT will only use companies that have signed up to Privacy Shield or who otherwise comply with GDPR principles.

## **Internet Data**

LYT confirms that the above guidelines apply to internet-based data, including emails and social media interactions.

LYT asks all staff, whether full-time, part-time, contractual or freelance, and volunteers to abide by the following guidelines in terms of internet-based personal information.

- LYT staff, tutors and volunteers will not keep or use members' electronic or internet-based details (including social media accounts) in a personal capacity, or for purposes outside of LYT projects.
- Electronic personal details (including emails, electronically stored phone numbers, etc.) will be deleted from staff's personal communication devices on completion of the project.
- LYT staff, tutors and volunteers will not email, phone, text, Facebook or otherwise contact LYT members directly to promote or recruit for projects outside of LYT.
- LYT staff, tutors and volunteers will not 'Friend' or accept as a 'Friend' an LYT member onto their personal Facebook account, or otherwise connect with an LYT member on other social media sites.
- LYT will not share members' posts on LYT's organisational social media platforms unless the post relates to the members' interaction with LYT as set out in the Social Media policy.

Please refer to the separate Social Media policy for more information regarding the correct use of online data.

## **COVID-19 and In-Person Activity**

During the Covid-19 pandemic, LYT may share data including contact and attendance details with NHS Test and Trace, if asked to do so. Wherever possible, LYT will contact attendees directly if we are made aware of a positive case within a session group.

LYT will collect additional data to ensure the health and safety of participants and workers during in-person activity. We will ask participants and staff to confirm:

- a) if they or anyone in their household have experienced any of the (3) core symptoms of Covid-19 in the last 10 days
- b) if they have been asked to self-isolate by NHS Test & Trace
- c) A reading of the persons' temperature when attending the activity.

Any documentation of answers to these questions will be erased after 10 days from the final project session. Staff should securely destroy any paper copy registers with this information once details have been recorded electronically.

## **Remote Working:**

During the Covid-19 pandemic, LYT's offices have been closed and all staff have worked from home. LYT realises that even after the office reopens, home / remote working is likely to continue in some form.

LYT's documents will be accessible through a password-protected cloud platform (currently Google Drive). Workers must ensure that no documents with personal data are shared outside the organisation. In Google Drive, this means that sharing settings of any files with personal data must be set to 'Restricted' and shared only with specific designated people

Whenever possible workers should use LYT computer and mobile phone devices when processing data. When this is not possible, workers should take the additional steps to ensure personal data is secure:

- Avoid creating or downloading documents with personal data onto personal computers. Save any files with personal data directly to the appropriate LYT Google Drive folder.
- If files with personal data must first be created on or downloaded to a personal computer prior to upload to Google Drive, the worker must subsequently delete the document from their local drive.
- Regularly check and delete files with personal data (including videos) from local folders, including downloads folder and other local folders (e.g. local Zoom folder)
- For mobile devices, workers should store contacts on the LYT sim card. If this is not possible (e.g. with ios devices), workers must erase any personal information from the handset when returning the sim card to LYT.

Workers should refer to and follow LYT's Technology Usage policy for more detailed instructions regarding remote working.

### **Changes to Data:**

Anyone whose data is processed by LYT can change their information or how that information is used at any time by contacting us on 020 8690 3428 or [info@lewishamyouththeatre.com](mailto:info@lewishamyouththeatre.com).

Newsletter subscribers will be able to unsubscribe from communications by clicking the 'unsubscribe' button at the bottom of their newsletter.

### **Responsibilities:**

Everyone who works with and for LYT is responsible for handling data lawfully, fairly and transparently. The following named people are responsible for ensuring the overall integrity of the data protection processes at LYT:

#### **Data Controller:**

Victoria Shaskan, Executive Director –  
[victoria@lewishamyouththeatre.com](mailto:victoria@lewishamyouththeatre.com)

#### **Senior Information Rights Owner (SIRO):**

Natalie Beeraje, Trustee  
*Please contact LYT for the SIRO's direct contact details:*  
[info@lewishamyouththeatre.com](mailto:info@lewishamyouththeatre.com)

### **Data Breaches:**

If a breach of data protection laws occurs, this should be reported in the first instance to the Data Controller, who will report the matter to the SIRO.

If the Data Controller and SIRO believe that the breach has resulted in no material loss, they will record the incident in a data breach log, including information on steps taken to ensure the breach will not happen again.

If the breach results in material loss of data or to data subjects, the Data Controller will report the breach within 72 hours to the Information Commissioners' Office (ICO) by calling: 0303 123 1113

Data subjects (anyone whose data is held by LYT) may also contact the Information Commissioners' Office (ICO) if they feel their data has been used inappropriately, resulting in a breach of data protection laws.

*Last Reviewed: February 2021*

*To Be Reviewed: May 2022*