

Next Stage Theatre Company and Burdall's Yard Data protection policy

Context and overview

Key details

- Policy prepared by: Francesca McBride
- Approved by board / management on: 01/12/21
- Policy becoming operational on: 01/12/21
- Policy reviewed by: Martin Campbell [05/01/24]
- Next review date: 01/06/24

Introduction

Next Stage Theatre Company, which runs Burdall's Yard, 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.

Why this policy exists

This data protection policy ensures Next Stage Theatre Company:

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers, members, volunteers and patrons
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law

The General Data Protection Regulation ("GDPR") comes 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.

To comply with the GDPR, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The GDPR is underpinned by six important principles, summarised below:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality

As a data controller, Next Stage Theatre Company shall be responsible for, and be able to demonstrate compliance with these principles.

People, risks and responsibilities

Policy scope

This policy applies to:

- The head office of Next Stage Theatre Company
- All branches of Next Stage Theatre Company
- All staff and volunteers of Next Stage Theatre Company
- All contractors, suppliers and other people working on behalf of Next Stage Theatre Company

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ...plus any other information relating to individuals

Data protection risks

This policy helps to protect Next Stage Theatre Company from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately or via poor security.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Individuals being harmed through data being inaccurate or insufficient

Responsibilities

Everyone who works for or with Next Stage Theatre Company has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The board of directors is ultimately responsible for ensuring that Next Stage Theatre Company meets its legal obligations.
- The data protection officer is responsible for:
 - o Keeping the board updated about data protection responsibilities, risks and issues.
 - o Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - o Arranging data protection training and advice for the people covered by this policy.
 - o Handling data protection questions from staff and anyone else covered by this policy.
 - o Dealing with requests from individuals to see the data Next Stage Theatre Company holds about them (also called 'subject access requests').
 - o Checking and approving any contracts or agreements with third parties that may handle the company's personal data.
 - o Notification to the Information Commissioner's Office
- The IT manager is responsible for:
 - o Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - o Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - o Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- The marketing manager is responsible for:
 - o Approving any data protection statements attached to communications such as emails and letters.
 - o Addressing any data protection queries from journalists or media outlets like newspapers.
 - o Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

General staff guidelines

- All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.
- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.

- Next Stage Theatre Company will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers and should only be uploaded to approved cloud computing services.
- Servers containing personal data should be sited in a secure location.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

Personal data shall be retained for appropriate periods of time balancing legal obligations, with operational, heritage and privacy considerations.

Data use

Personal data is of no value to Next Stage Theatre Company unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorised external contacts.
- Personal data should never be transferred outside of the European Economic Area.
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

Data accuracy

The law requires Next Stage Theatre Company to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Next Stage Theatre Company should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- Next Stage Theatre Company will make it easy for data subjects to update the information Next Stage Theatre Company holds about them.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the marketing manager's responsibility to ensure marketing databases are checked against industry suppression files every six months.

Subject access requests

All individuals who are the subject of personal data held by Next Stage Theatre Company will have the right to obtain:

- Confirmation that their data is being processed;
- Access to their personal data; and
- Other supplementary information, including:
 - o The purposes of the processing

- The categories of personal data concerned;
- The recipients or categories of recipient to whom the personal data have been or will be disclosed
- Where possible, the envisaged period for which the personal data will be stored
- The existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- The right to lodge a complaint with a supervisory authority
- Where the personal data are not collected from the data subject, any available information as to their source;
- The existence of automated decision-making, including profiling

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at nextstagebath@aol.com. The data controller can supply a standard request form, although individuals do not have to use this. Next Stage Theatre Company will provide the information in a commonly used electronic format.

Next Stage Theatre Company will provide the information free of charge. However, Next Stage Theatre Company can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. Next Stage Theatre Company may also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information. The data controller will provide the relevant data within one month of receipt, unless there are exceptions where request are complex or numerous.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

Next Stage Theatre Company will also respond to other requests from data subjects, including the right of rectification and the right to erasure.

Next Stage Theatre Company will aim to respond to genuine requests within 30 days.

Providing information

Next Stage Theatre Company aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is collected and being used
- How to exercise their rights

To these ends, the company has privacy statements, setting out how data relating to individuals is used by the company. These are available on request, with a summary available on the company's websites.

Please note: our website provides links to other websites. Our privacy notice only applies to the Next Stage Theatre Company and Burdall's Yard websites, when individuals link to other websites they should read the privacy notices on those sites.