



## **Data Protection Policy Statement**

The Data Protection Act 1998 regulates the processing of information relating to individuals. This includes obtaining, holding, using and disclosing such information. The Act covers computerised records, manual filing systems and card indexes.

As a “not for profit” organisation, Havant Dynamo Youth Theatre herewith referred to as HDYT is exempt from the Data Protection Register. It does however appoint an Information Manager.

HDYT will hold the minimum personal information necessary to enable it to perform its functions. All such information is confidential and needs to be treated with care to comply with the law.

### **Dissemination**

All volunteers will be made aware of this policy and procedure as part of their induction. It will be made freely available to all HDYT users via our website.

Definition HDYT volunteers –

Trustees.

Artistic Director

Chairman

Secretary

Treasurer

Session volunteers

Back Stage volunteers

## **Review date**

This Data Protection Policy will be reviewed every 2 years by the Trustees, to ensure that its operation is satisfactory. This policy was created in June 2014. Next review date June 2018.

## **The use of personal data**

HDYT holds personal data on a variety of individuals including:

- Those who have registered and/or subscribed to, or become members of HDYT on behalf of themselves or their organisation.
- Other individuals and organisations with an interest in the organisation.
- Prospective, and current members.
- Prospective, and current members Parents.
- Friends of HDYT.
- Suppliers.
- Theatre, charity and funding contacts.
- Volunteers.

This data is held in both electronic and paper-based formats.

Personal information must be dealt with properly irrespective of how it is collected, recorded, used and disposed of and there are safeguards to ensure this in the Data Protection Act 1998.

This will include (but not be restricted to) the conduct of normal business management.

## **Data protection principles**

HDYT will process all personal information in accordance with the Data Protection Act and will adhere to the principles of data protection as detailed in the Act.

The eight principles require personal information is:

- Accurate and up-to-date.
- Adequate, relevant and not excessive.
- Kept secure (see Data Retention Policy for more information).
- Not be kept for longer than is necessary.
- Not transferred to countries outside the European Economic Area, unless the information is adequately protected.
- Processed in line with the rights of individuals.
- Processed fairly and lawfully.
- Processed for specified purposes.

In addition, HDYT will ensure that:

- Anyone that wants to make enquiries about handling personal information knows how to do so.
- Volunteers managing and handling personal information understand they are responsible for following good data protection practice and are appropriately supervised and trained to do so.
- Methods of handling personal information are clearly described.
- Queries about handling personal information are dealt with promptly and courteously.

## **Consent**

HDYT seeks to use personal data only for the purposes of legitimate interests and, where practicable, with consent. Individuals have the right to know what personal data HDYT holds about them and for this to be correct. Please see the “accessing personal data” section for more information.

It is a condition of it's day to day running that volunteers, friends, members and parents consent to HDYT processing their personal data. For other individuals and registered groups, HDYT may gather data during the course of its normal activities. It will be used only for legitimate purposes.

### **Sensitive personal data**

Sensitive personal data is defined under the Act to include matters such as race, gender, health needs, disabilities or family details. Sometimes it is necessary to process sensitive information to ensure HDYT can operate policies to protect the health and safety of the individual. Because this information is considered sensitive, and it is recognised that the processing of it may cause particular concern or distress to individuals, and others affected will be asked to give express consent for HDYT to do this.

### **Individuals' rights**

If an individual has a query regarding the accuracy of their personal data, that query will be dealt with fairly and impartially. Individuals have the following rights regarding data processing, and the data that are recorded about them:

- Not to have significant decisions that will affect them taken solely by automated process.
  - To be informed about mechanics of automated decision-taking process that will significantly affect them.
- To make subject access requests regarding the nature of information held and to whom it has been disclosed.
- To prevent processing for purposes of direct marketing.
- To prevent processing likely to cause damage or distress.
- To request HDYT to assess whether any provision of the Act has been contravened.
- To sue for compensation if they suffer damage by any contravention of the Act.
- To take action to rectify, block, erase or destroy inaccurate data.

### **Third party access**

Third parties given access to the organisation's data must demonstrate compliance with HDYT's IT Security, Data Protection and Data Retention policies. If appropriate, HDYT will require third parties to sign a confidentiality declaration. Third party access is not to be entered into lightly and must never be done without authorisation from the Information Manager.

### **Accessing personal data**

Individuals have the right to see the personal data that HDYT holds about them and for that data to be corrected if it is wrong. Minor requests may be dealt with informally in the course of normal administration, at the discretion of HDYT.

Formal requests for access to personal data should be in writing to:

Havant Dynamo Youth Theatre  
29 Mill Lane  
Fishbourne  
West Sussex  
PO19 3JW

There may be a fee for this service which will be payable in advance.

Please see Safeguarding and Child Protection Policy and Procedure for Use of internet, mobile telephone and social networks with young people.