morearts_logo_3cm.jpg

The Cultural Partnership: more arts.

Charitable Incorporated Organisation No.1154785

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| P&P No: | P&P/ma016 |
| P&P TITLE: | General Data Protection Regulation (GDPR) Policy |
| APPLICABLE TO: | Trustees  Contractors |
| BACKGROUND: | The General Data Protection Regulation (GDPR) is a new, Europe-wide law that replaces the Data Protection Act 1998 in the UK. The GDPR sets out requirements for how organisations will need to handle personal data from 25 May 2018. The Cultural Partnership: ’more arts.’ is required to abide by the legal requirements of GDPR.  General information about GDPR:  Overall description of GDPR:  <https://ico.org.uk/for-organisations/charity/charities-faqs/>  12 Steps all charities must take:  <https://ico.org.uk/media/1624219/preparing-for-the-gdpr-12-steps.pdf> |
| P&P DETAIL: | For each database (list of individuals) which we hold, we will maintain an associated ‘profile’ specifying detailed procedures for that database to ensure compliance with GDPR (see Appendix A below).  This Policy specifies the 12 steps that ‘more arts.’ takes to be compliant with GDPR.  AWARENESS: We will make sure that decision makers and key people  are aware that the law is changing to the GDPR  INFORMATION WE HOLD: We will document what personal data we hold, where it came from and who we share it with (see Appendix A).  COMMUNICATING PRIVATE INFORMATION: When we invite individuals to subscribe to one of our databases, we will explain in a Privacy Notice how their details will be used, how they can be removed from the database and how they can complain to the ICO if we fail to meet our obligations.  INDIVIDUAL’S RIGHTS: We will ensure our procedures cover all the rights  individuals have, including how we would delete personal data or provide  data electronically and in a commonly used format. Rights of individuals in our databases include at least the right to be informed, right to erasure, right to rectification.  SUBJECT ACCESS REQUESTS: We will accept requests from individuals to add, correct or delete their data, without charge.  LAWFUL BASIS FOR PROCESSING PERSONAL DATA: We will ensure that the way we process data of individuals is lawful.  CONSENT: We will ensure that data we hold about individuals has been provided by the individual with their explicit consent. If we are sure all existing data has been provided with consent, we are not required to automatically ‘repaper’ or refresh all existing DPA consents in preparation for the GDPR.  CHILDREN: If we hold data from individuals below the age of 16 we will specify a process to obtain parental consent.  DATA BREACHES: For each database, we will specify the precise procedure we will take if we become aware of a data breach. This may include contacting some (or all) individuals in the database and notifying the Charity Commission and the Information Commissioners Office (ICO)  DATA PROTECTION BY DESIGN AND DATA PROTECTION IMPACT  ASSESSMENTS: For each database we will specify how the data is kept safe and preserved.  DATA PROTECTION OFFICER: For the purposes of GDPR the Treasurer/Trustee is the official Data Protection Officer of The Cultural Partnership.  INTERNATIONAL: As we do not operate internationally, there are no international GDPR requirement for us. |
| TRAINING: | All newly-appointed Trustees and Contractors to be advised of this policy. |
| REVIEW DATE: | As required. |
| DATE P&P CREATED/UPDATED: | 4th May 2018 |
| DATE APPROVED BY TRUSTEES: | t.b.a. |

General Data Protection Regulation (GDPR) Policy

APPENDIX A

The table below will be completed, for each database (list of individuals) maintained by The Cultural Partnership, by the person responsible for the database. The table will be stored in a file named *databasefilename*\_GDPR\_PROFILE.docx and a copy sent to the DPO.

|  |  |
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| Name of the list (database)  Use this name in the Profile filename. |  |
| Precisely where is the list file kept? |  |
| Password required to open & edit? |  |
| Currently how many entries in the list? |  |
| When was the list first compiled? |  |
| Who is responsible for the list? |  |
| What is the list for? |  |
| Who is in the list (e.g. local artists, ‘more arts.’ friends, etc.)? |  |
| Has everyone in the list ‘Opted in’? | Yes / No. (If No, everyone in the list must be contacted to gain their approval to remain in the list) |
| Are we aware of any children (<16yrs) in the list? | Yes / No |
| If ‘Yes’, have we obtained parental consent? | Yes / No (If No, and parental consent not available, entries for children must be removed) |
| Which data fields are recorded in the list? |  |
| Is the data we hold lawful (no sensitive information may be held)? | Yes / No (If No, sensitive data must be removed immediately) |
| Exact wording of the Privacy Notice included with every mailing |  |
| Exactly how are new entries added to the list, and who adds them? |  |
| Exactly how can individuals request their removal from the list? |  |
| Exactly how do individuals obtain a copy of their entry in the list? |  |
| Exactly now do individuals correct errors in their entries? |  |
| For how long are entries retained? |  |
| Is the list online? | Yes / No |
| If yes, what prevents the list being hacked? |  |
| If the list was stolen, what would we do? |  |