

DRUM + BRASS

Name of Policy:	GDPR (Data Protection and Security.)	Approved by:	DW
Version number:	01	Ratified by:	KBJ, DV, SM
Date Created:	June 2020		
Date Reviewed:	January 2024	In use:	y
Date of next review:	January 2026	Written by:	JH

Target Audience	<ul style="list-style-type: none"> • All staff – for the purposes of this policy this means directors, employees, freelancers, sessional workers, volunteers. • Project partners • Project participants All other users of Drum and Brass's services
Exceptions to this policy	None
Related documents	Risk assessments; safeguarding policy; code of conduct; lone working policy; online working policy

D&B adheres to the following principles to ensure compliance with the Data Protection Act 2018 and General Data Protection Regulation (GDPR)

We have a clear understanding of what personal data is, including special categories of data. We collect contact data in hardcopy/digital form for the purposes of informing people about our work and we store/hold it securely online or in locked cabinets.

We only collect, store or use personal data if our group needs to do so for a clear, specific purpose. Our group can use personal data if it is in our group's legitimate interests. This means that we can use data in ways that are necessary in order to run our group.

What purpose is data collected for?

We only collect, store and use the minimum amount of data we need for our purpose. We don't keep extra data if we don't know why we need it, and we don't keep data that is no longer needed for a clear purpose.

If we do store/hold on to any data, what is our policy for reviewing whether it's still needed and destroying it if not? Tell people what data you have about them. Do we let people know what we hold and why?

People know how to contact us if they want us to remove their data from our records and we remove it if requested.

Data may belong to the group or to us personally. Contact details held by the group cannot be used for any other than group purposes.

We will use a coding system to anonymise sensitive records such as those for safeguarding concerns raised - we will store names and other key identifying data separately so the two can't be married up.

Storing data securely.

Personal data (which includes photos), is stored either in a secure online location (Google Drive) or in a locked cabinet.

Information we share must be accurate and up-to-date, shared in a timely fashion and shared securely.

Use of secure email service.

We will check the guidelines from other agencies when sharing information.

Information which is shared should be necessary for the purposes we are sharing it, and must only be shared with those people we know have a justifiable need to have it.

This is relevant to information shared within the group as well as with external agencies.

<https://ico.org.uk/media/for-organisations/documents/1567/exemption-from-registration-for-not-for-profit-organisations.pdf>

We need to make sure we keep within the exemption rules insofar as we are not registered with the Information Commissioner's Office.