

VERD DE GRIS ARTS

Data Protection Policy

Incorporating the EU General Data Protection Regulations (GDPR) March 2018

This policy draws together the essential elements of the Data Protections Acts 1984, 1998 and 2018 in as far as they affect personal data capture and processing in our organisation.

Definition of personal data

Personal data is any information that relates to a living individual.

Registration

Verd de gris arts complies with the requirement to register all personal data held and to state the purposes for which it is required to be held. It ensures the appropriate fees are paid on the due date.

Summary of Principles followed

All processing undertaken by Verd de gris arts will be fair and lawful, accurate and up-to-date, and the data held will be adequate, relevant, not excessive and be held for no longer than is necessary. This means that when personal data becomes out of date, or is no longer relevant to the purpose for which it was originally collected, there will be arrangements in place for it to be destroyed. See also “Guiding Principles” below.

Conditions for processing personal data

Verd de gris arts will ensure that personal data is only processed (that is, used) if one of several conditions apply including:

1. an individual has given their consent
2. the processing is part of a contract
3. there is a legal obligation to process the data
4. the processing is necessary to protect the individual.

Sensitive data

“Sensitive personal data” is defined as including data relating to race, ethnic origin, political affiliations, religious or other beliefs and sexuality. This type of data demands greater protection and the organisation is obliged to ensure one of the following is true before the data can be processed:

5. an individual has given their explicit consent **
6. there is a legal requirement to process the data
7. it is necessary to protect the vital interests of the individual.

** Explicit consent means fully informing the individual of the relevant facts in relation to the proposed processing and getting their written consent.

The protection of personal data

It is mandatory to ensure that appropriate technical and organisational measures are taken to prevent unauthorised access to or disclosure of data. This includes accidental loss or destruction of, or damage to, personal data. Additionally, a request for information under the Act may not be refused or ignored.

Guiding Principles

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
4. Personal data shall be accurate and, where necessary, kept up to date;
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of data subjects under the Act;
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Staff Awareness

This policy shall be made available to all contracted staff and volunteers. We will endeavour to deliver relevant training to all staff and volunteers. Jeff Turner has been elected as current GDPR Lead.

Publication of Web pages

The Internet is only to be accessed via PCs which have been expressly set up within the organisation for that purpose.

Publication of personal information or images of individuals on any web site the organisation develops will only occur if the written consent of the individuals concerned has been given.

The use of images of people

When planning to take photos of anyone, be they adults or children, Verd de gris arts will consider the need to get consent to take the photos and clearly stated consent about how the photos can be used e.g. just for a specific purpose/project or on a web site.

Use of electronic mail and the Internet

When using electronic mail and the Internet Verd de gris arts will consider the following Data Protection issues.

Not to include personal or confidential information in the text of emails (or as an email attachment) to be sent outside the organisation unless appropriate encryption is applied to protect it.

Not to treat E-mail as a secure method of communication when dealing with personal data as defined by the Data Protection Act.

Participants right to see their project files / records

Verd de gris arts takes into account that under normal circumstances, all project participants have got the right to see any information that is held about them.

Last reviewed: at Management Committee Meeting 24/10/2024

Signed:

Jeff Turner - Director

A handwritten signature in black ink, appearing to be 'J Turner', with a stylized, cursive script.

Fi Kellet - Chair

A handwritten signature in black ink, appearing to be 'Fi Kellet', with a stylized, cursive script.