



DATA PROTECTION POLICY AND PROCEDURES

1. Introduction

CYTO is committed to a policy of protecting the rights and privacy of individuals, CYTO needs to collect and use certain types of data in order to carry on our work. This personal information must be collected and dealt with appropriately.

The Data Protection Act 2018 (DPA) govern the use of information about people (personal data). Personal data can be held on computer or in a manual file, and includes email, minutes of meetings, and photographs. CYTO will remain the data controller for the information held. CYTO will be responsible for processing and using personal information in accordance with the Data Protection Act.

Management committee members, Trustees, Staff and volunteers running CYTO who have access to personal information, will be expected to read and comply with this policy.

2. Purpose

The purpose of this policy is to set out CYTO commitment and procedures for protecting personal data. CYTO regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with.

CYTP will comply following 08 principles for processing personal data of the Data Protection Act Legislation :

1. Shall be obtained and processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.



8. 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 information.

The following list contains definitions of the technical terms we have used and is intended to aid understanding of this policy:

Data Controller – The person who (either alone or with others) decides what personal information CYTO will hold and how it will be held or used.

Data Protection Act 2018– The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Protection Officer – The person on the management committee who is responsible for ensuring that it follows its data protection policy and complies with the Data Protection Act 2018

Data Subject/Service User – The individual whose personal information is being held or processed by CYTO (for example: members or their parents)

‘Explicit’ consent – is a freely given, specific and informed agreement by a Data Subject (see definition) to the processing of personal information about her/him.

Explicit consent is needed for processing sensitive data this includes the following:

- a) racial or ethnic origin of the data subject
- b) political opinions
- c) religious beliefs or other beliefs of a similar nature
- d) trade union membership
- e) physical or mental health or condition
- f) sexual orientation
- g) criminal record
- h) proceedings for any offence committed or alleged to have been committed.

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 2018.

Processing – means collecting, amending, handling, storing or disclosing personal information

Personal Information – Information about living individuals that enables them to be identified – e.g. names, addresses, telephone numbers and email addresses. It does not apply to information about organisations, companies and agencies but applies to named persons, such as parents, members and individual volunteers of CYTO.



Data collection

Informed consent is when

- An Individual/member clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

CYTO will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, **CYTO** will ensure that the Individual/member

- a) understands why the information is needed
- b) Understands Clearly what it will be used for and what the consequences are should the Individual/member decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

3. Nature of Information collected by CYTO

Parents and members

If anybody wishes to become a member of CYTO, we will collect the following personal data: parent or guardian's name; contact and address details; relationship to the student; emergency contact numbers; name and date of birth of student; and any medical conditions the student has. If the member is over 16 years of age, one has to ensure that he/her has their permission to share these details with us.

CYTO will from time to time take photographs and film footage of students for use in CYTO marketing and publicity material (both online and offline). We will explicitly ask for permission from the member (if 16 years of age or over) or parent (if under 16 years of age) on the CYTO registration form. We will not assume permission if the form is not complete.



Payments

CYTO accepts cheque, standing orders and cash, which are paid securely to CYTO's account with HSBC. When CYTO needs to store the financial information of individuals or organisations, these will be stored securely and locked in a cupboard (manual data) or password protected (computerized data) and only accessible by authorized personnel. It is possible to pay by credit/debit card for CYTO productions. These payments are processed securely through Eventbrite. CYTO does not directly collect, process or store financial information processed by Eventbrite.

Other individuals

If people wish to contact us for other purposes, we ask for their contact details, so we can respond to their queries.

Sensitive personal data

The Data Protection Act gives special protection to sensitive personal data which will include information relating to health or sex life, race or ethnic origin, political beliefs or membership, philosophical or religious beliefs, trade union membership and information about the commission of offences and related proceedings. People should only provide this information if it is required in response to a mandatory question, or if they are otherwise content for us to process this information

4. Disclosure

The information we collect allows us to:

- Provide facilitating services in singing, dance and drama and the organisation of performances
- Administer our websites and provide customer services
- Meet legal, regulatory and compliance requirements including the administration of CYTO's statutory obligations relating to children
- Gather management information for research purposes and to form statistical analysis
- Communicate with members

We may employ the services of a third party to help us in certain areas, such as website hosting, support and maintenance, and child protection issues. In some cases, the third party may receive information. However at all times, we will control and be responsible for the use of information. CYTO regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

CYTO intends to ensure that personal information is treated lawfully and correctly.

We may also disclose personal data when we believe this is required by law, to enforce or comply our terms and conditions or to protect the rights, property, safety of CYTO, our members or others.



5. Transfer of information outside of the EU

Some of the recipients of personal data (including sensitive personal data) may be in countries outside of the European Economic Area such as the US but we remain responsible for making sure that the personal data is given adequate protection and held securely. By submitting personal data to CYTO, people agree that such transfers may take place.

6. Marketing Communications

From time to time, CYTO may wish to provide information about CYTO's workshops, productions and events (including by post, phone, email and text) which may be of interest to the concern. If someone does not wish to receive such information, the appropriate box may be left unticked on the application form or admin@cyto.org.uk may be contacted to unsubscribe at any time.

7. Links

Our websites may contain links to other third-party websites over which we have no control. We are not responsible for privacy policies or practices of any websites to which anybody choose to link from our sites. We encourage to review the privacy policies of those other web sites to understand how they collect, use and share personal information.

8. Security

We have implemented reasonable technical and organisational measures designed to secure personal data from accidental loss and from unauthorised access, use, alteration or disclosure. However, the Internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use personal data for improper purposes. CYTO will report certain data breaches to our data protection authority within 72 hours of becoming aware of the breach. CYTO will notify all data subjects of a high-risk breach. We make reasonable efforts to ensure that all personal information is kept securely, and we pay attention to the security of sensitive data. All personal data is accessible only by those who need to use it and sensitive data must be either;

- Kept in a lockable room with controlled access
- Kept in a locked filing cabinet
- Kept in a locked drawer
- If computerised, be password protected

9. Data Storage

Information and records relating to parents and members will be stored securely and will only be accessible to authorised persons. Parents and members' personal data will only be stored by CYTO for the duration of the membership plus six months after the end of their membership unless consent is explicitly given by the outgoing member. After this time, we will ask the parent of member if they would like us to retain their personal data for purposes of communication or to become a friend of CYTO. Unless given explicit permission to retain parents and members personal data after this time we will securely remove your personal data from our database.



10. Data Accuracy

CYTO aims to only retain accurate personal information for all our data subjects. All data subjects have the right to correction if data is inaccurate and to place a "hold" on the data until it is amended and reflects an accurate record of the data subject. CYTO will ask all members to fill in a registration form at the beginning of every school year, in order to maintain accurate personal data.

11. Windup of CYTO

In the event that CYTO is wound up or integrated with another charity, the personal details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

12. Responsibilities

CYTO is the Data Controller under the Act, and is legally responsible for complying with Act, which means that it determines what purposes personal information held will be used for.

The management committee will take into account legal requirements and ensure that it is properly implemented, and will through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information,
- Meet its legal obligations to specify the purposes for which information is used,
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements,
- Ensure the quality of information used,
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken
 - The right of access to one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information
- Take appropriate technical and organizational security measures to safeguard personal information,
- Ensure that personal information is not transferred abroad without suitable safeguards,

- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information,
- Set out clear procedures for responding to requests for information



The Data Protection Officer on the management committee is:

Name: *Mary Wolf*

Contact Details: marywolf@cyto.org.uk

The Data Protection Officer will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- Dealing promptly and courteously with any enquiries about handling personal information
- Describe clearly how it handles personal information
- Will regularly review and audit the ways it holds, manage and use personal information
- Will regularly assess and evaluate its methods and performance in relation to handling personal information
- All staff and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them

13. Risk Management

The consequences of breaching Data Protection can cause harm or distress to members/individuals if their information is released to inappropriate people, or they could be denied a service to which they are entitled. Volunteers/staff should be aware that they can be personally liable if they use of personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of the CYTO is not damaged through inappropriate or unauthorised access to the data collected.

14. Further information

Members and others are entitled to see the information held about them. They may review, correct, update or change their personal data at any time.

If members have specific questions about information security and data protection in relation to CYTO, please contact the Data Protection Officer OR on admin@cyto.org.uk



The Information Commissioner's website (www.ico.gov.uk) is another source of useful information.

All staff, volunteers and members of the management committee of CYTO must agree to maintain confidentiality at all times, unless a conflict of interest has been identified.

Policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 2018

Policy approved by Management Committee: May 2018

Being reviewed: September 2021

Name- David Page

Title-Chair



CROYDON YOUTH THEATRE ORGANISATION

PROTECTION

**TO DATA
COMMITMENT**

As a trustee / management committee member / member of staff / volunteer (please delete) of Croydon Youth Theatre Organisation, I confirm that:

- I have read and understood the Confidentiality Policy
- I have been given a copy of the policy
- I will act at all times in accordance with the policy for the protection and reassurance of clients,

Name (please print):

Signed: _____

Dated: _____