

## **Data Protection Policy**

### **LYT Mission Statement**

All young people have a powerful voice and a right to be heard. Lewisham Youth Theatre (LYT) nurtures and inspires young people's voices through free participatory theatre activities, helping them to develop enduring and transferable skills that lead to increased chances of life and long-term well-being. We bring young people together from across the Lewisham community to create outstanding theatre in an environment of high expectations and collaboration. We work from the core belief that artistic excellence is key to expanding young people's horizons and creating lasting transformation.

### **Introduction & Policy Statement**

Lewisham Youth Theatre (LYT) is fully committed to compliance with the requirements of the Data Protection Act 1998 ("the Act") and the UK General Data Protection Regulation ("GDPR"), which came into force on 25 May 2018. LYT will therefore follow procedures that aim to ensure that all employees, freelancers, partners, volunteers or others who have access to any personal data held by or on behalf of LYT, are fully aware of and abide by their duties and responsibilities under the Act.

To operate efficiently, LYT collects and uses information about people with whom it works. This may include:

- Past and present youth theatre participants (also referred to as members)
- Members of the public, including family of members, community members who engage with LYT's activities
- Current, past and prospective employees, freelancers, trainee facilitators and volunteers
- Partners and funders, including individuals and private and statutory organisations
- Suppliers

LYT's funders, including but not limited to the London Borough of Lewisham, are required to collect and use information to comply with stated funding requirements. LYT collects, records, and uses personal information, but it is handled and dealt with properly, whether it be on paper, digitally or recorded by any other means.

LYT regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between LYT and its membership and those with whom it carries out business. LYT will ensure that it treats personal information lawfully and correctly.

To this end, LYT fully endorses and adheres to the Principles of Data Protection as set out in the General Data Protection Regulation 2018.

## **Data Collection**

### **The data we process from participants/families**

We collect and use the following data to communicate with our participants and their families and to make sure participants receive the support they need to access our activities:

- Contact Details: Including names, address, telephone, email and emergency contacts
- Monitoring Data: Date of birth (age); gender; ethnicity, sexuality
- Sensitive Data: Additional needs (including disabilities and physical, mental and learning difficulties); Additional support needs (including various barriers to accessing our projects)
- Participation Information: Including projects and sessions attended and evaluation feedback

Participants'/families' information is stored in paper format in our office, electronic format on our computer systems/ Google Drive and online through the Substance Views database.

### **The data we process from staff, freelancers, trainee facilitators and volunteers**

We may collect and use the following data to communicate with and manage our staff, run our payroll systems and to ensure the safety of our participants:

- Contact Details: Including names, address, telephone, email and emergency contacts
- Monitoring Data: Date of birth (age); gender and pronouns
- Identity Documents: Passport or right to work in the UK, Drivers' License number, DBS check
- Payroll Information: NI numbers, P45s, banking details
- HR Information: References, performance appraisal notes

Staff's information is currently stored in electronic format on our computer systems/ Google Drive and online through the Xero bookkeeping/payroll system.

### **The data we process from partners and members of the public**

We may collect contact details (including name, role, organisation, address, telephone and email) from those who interact with LYT to communicate about our activities either directly or through our newsletter. This information is currently stored in electronic format on our computer systems and online through Google Drive and Mailchimp.

### **Data processing by outside agencies**

Any person or organisation processing data for LYT's administrative purposes (e.g. accountants, external HR) or their own purposes (e.g. freelancers, funders or partners) must confirm how they intend to use the data in compliance with LYT's Data Protection Policy.

### **Photography/Video**

We take photos/video of participants and workers to record and showcase our activities. We retain photographic/video evidence of each project/activity, currently in perpetuity.

This information is currently stored in electronic format on our computer systems, LYT mobile phones and shared on our website, social media platforms and publications.

## **Training**

All workers and volunteers will receive and be asked to familiarise themselves with LYT's Data Protection Policy. All staff, freelancers and volunteers will undergo an induction at the beginning of their engagement, with specific training in data protection.

## **Guidelines and Procedures**

Anyone accessing or processing personal information must adhere to the following seven principles, taken from the General Data Protection Regulation 2018, which will ensure the information is:

### **1. Fairly, lawfully and transparently processed**

- Information gathered will only be used in accordance with these principles.
- Information will be gathered with the consent of the individual, or the individual's guardian (if the individual is under 18).
- LYT will state how the information will be used.
- LYT will handle individuals' personal data only in ways they would reasonably expect.

### **2. Processed for limited purposes**

- Information gathered will only be used for LYT's charitable purposes.
- As part of its charitable activities, LYT will use information gathered (including photographs/video) to report on its activities to funders.
- As a general rule, LYT will not pass details on to other parties, including funders, that will allow the individual to be identified, with the exception of photo/video evidence.
- If LYT is asked to pass on information that may identify an individual to other parties, including funders, LYT will always try to seek clear consent from the individual (or guardian if under 18) before passing on the information.
- In special circumstances regarding Safeguarding or interactions with law enforcement, confidentiality may be broken. In emergency safeguarding situations or in certain interactions with law enforcement, we may need to pass on information without consent. See our Privacy Statement for more information.
- LYT will share the details of staff, volunteers and partners with other workers in order to allow the smooth running of LYT's charitable activities.

### **3. Adequate, relevant and not excessive**

- LYT will collect information that will enable us to fulfil our charitable purposes, including information that will allow us to:
  - Contact our members, partners, volunteers, staff, suppliers and community members.
  - Identify appropriate activities for members.

- Assess the needs of members to ensure the well-being, safety and inclusion of all those who interact with LYT.
- Assess demographic and equal opportunities data to help us monitor our effectiveness as an organisation.
- LYT will store member details in paper and electronic format through online/electronic database, registration forms, session registers, mentoring report forms and, if necessary, disclosure forms.
- LYT will store staff and volunteer details in paper and format through contact sheets, contracts/agreements, staff details forms, applications and CVs.
- LYT will store staff and volunteer details in electronic format through online/electronic database and electronic contact sheets.

#### **4. Accurate and up to date**

- LYT's database will be updated regularly to ensure information is current and correct.
- LYT will issue consent forms at the beginning of each project to capture up to date details.
- The information of active members will be updated on the database at the start of each project.
- The information of non-active members, partners, staff, volunteers, community members and suppliers on LYT's mailing list will be updated based on feedback received from quarterly newsletters and individual feedback from contact list members.

#### **5. Not kept for longer than is necessary**

- LYT will store member details in paper format during the time that members are active with LYT. Member information in paper format will be archived annually. Personal details will be destroyed from the archive after 5 years.
- Information of staff and volunteers no longer active with LYT will be archived annually. Archived information will be destroyed after 5 years.
- LYT will redact personal information from reports or disclosures after the individual has been out of contact with LYT for 3 years.
- LYT will store members details in electronic format for 5 years from the last date that the member was in active communication with LYT. After 5 years, LYT will delete members' details from the Views database. If members have agreed to receive LYT newsletters, they will continue to remain on the newsletter mailing list unless they choose to unsubscribe.
- LYT will keep an electronic mailing list (currently through Mailchimp). Positive actions to join LYT through registration forms, volunteering and employment will be taken as an opt-in to this newsletter. LYT will clearly state when actions are deemed as an opt-in to the newsletter list and give a clear option to decline subscription. Details of how to be removed from this list will be clearly laid out at the bottom of each communication. Details of members, staff, volunteers, partners and community members will be retained on the mailing list unless they unsubscribe or their contact details become invalid.

## **6. Processed in line with your rights and privacy**

- LYT will process all data in line with individuals' statutory rights. More information on your rights can be found in our Privacy Statement.
- The Data Controller will respond to individuals' who request to access a copy of the information LYT holds within 1 month of the request and to any objections to the processing of their own data, as required by law.
- The Data Controller will confirm the identity of the individual, if not immediately recognised by any staff, by asking questions about their data only the requester would know. If someone other than the person the data is about makes the request, the Data Controller will seek written authority from the individual. The Data Controller will redact any information that doesn't relate to the individual and include LYT's Privacy Statement in initial correspondence.

## **7. Secure**

- Personal information in paper format will be stored in a locked office.
- Electronic information will be stored on a password-protected database and a secure IT storage system, which only LYT staff can access.
- LYT's Senior Producer, Molly Cox, will be responsible for ensuring information security.

## **Internet Data**

LYT confirms that the above guidelines apply to internet-based data, including emails and social media interactions.

LYT asks all staff, whether full-time, part-time, contractual or freelance, and volunteers to abide by the following guidelines in terms of internet-based personal information.

- LYT staff, tutors and volunteers will not keep or use members' electronic or internet-based details (including social media accounts) in a personal capacity, or for purposes outside of LYT projects.
- Electronic personal details (including emails, electronically stored phone numbers, etc.) will be deleted from staff's personal communication devices on completion of the project.
- LYT staff, freelancers and volunteers will not email, phone, Whatsapp, Facebook message or otherwise contact LYT members directly to promote or recruit for projects outside of LYT.
- LYT staff, tutors and volunteers will not 'Friend/ Follow' or accept as a 'Friend/Follow' an LYT member onto their social media accounts or otherwise connect with an LYT member on any social media sites.
- LYT will not share members' posts on LYT's organisational social media platforms unless the post relates to the members' interaction with LYT.

## Remote Working

LYT's documents will be accessible through a password-protected cloud platform (currently Google Drive). Workers must ensure that no documents with personal data are shared outside the organisation. In Google Drive, this means that sharing settings of any files with personal data must be set to 'Restricted' and shared only with specific designated people.

Whenever possible workers should use LYT computer and mobile phone devices when processing data. When this is not possible, workers should take the additional steps to ensure personal data is secure:

- Avoid creating or downloading documents with personal data onto personal computers. Save any files with personal data directly to the appropriate LYT Google Drive folder.
- If files with personal data must first be created on or downloaded to a personal computer prior to upload to Google Drive, the worker must subsequently delete the document from their local drive.
- Regularly check and delete files with personal data (including videos) from local folders, including downloads folder and other local folders.

Workers should refer to and follow LYT's Technology Usage policy for more detailed instructions regarding remote working.

## Changes to Data

Anyone whose data is processed by LYT can change their information or how that information is used at any time by contacting us on 020 8690 3428 or [info@lewishamyouththeatre.com](mailto:info@lewishamyouththeatre.com).

Newsletter subscribers will be able to unsubscribe from communications by clicking the 'unsubscribe' button at the bottom of their newsletter.

## Responsibilities

Everyone who works with and for LYT is responsible for handling data lawfully, fairly and transparently. The following named people are responsible for ensuring the overall integrity of the data protection processes at LYT:

### Data Controller:

Molly Cox, Senior Producer –  
[victoria@lewishamyouththeatre.com](mailto:victoria@lewishamyouththeatre.com)

### Senior Information Rights Owner (SIRO):

Alice Chen, Treasurer  
*Please contact LYT for the SIRO's direct contact details:*  
[info@lewishamyouththeatre.com](mailto:info@lewishamyouththeatre.com)

## **Data Breaches**

If a breach of data protection laws occurs, this should be reported in the first instance to the Data Controller, who will report the matter to the SIRO.

If the Data Controller and SIRO believe that the breach has resulted in no material loss, they will record the incident in a data breach log, including information on steps taken to ensure the breach will not happen again.

If the breach results in material loss of data or to data subjects, the Data Controller will report the breach within 72 hours to the ICO by calling: 0303 123 1113

Data subjects (anyone whose data is held by LYT) may also contact the ICO if they feel their data has been used inappropriately, resulting in a breach of data protection laws.