

Shobana Jeyasingh Dance Data Protection Procedures 2020

This document to be used in conjunction with SJD's Data Protection Policy 2020

THE INFORMATION WE COLLECT, STORE AND PROCESS

1. Workshops and participatory activities

In order to register individuals for workshop and participatory activities, we periodically need to collect:

- names of individuals
- postal addresses of individuals
- email addresses
- telephone numbers
- relevant medical information (see below)

This data is collected using paper forms which may be distributed and collected electronically (typically as email attachments). The data is then transferred to spreadsheets which are kept on computers in the Shobana Jeyasingh Dance office and on our server which may be accessed remotely – see Security and Data Protection section below.

We only ask people for as much information as we need for the purposes specified, not more. Where this includes sensitive information, such as medical information, we make clear this is for the purpose of safe practice when participating in workshops.

Participant information (including address and demographic information) may need to be shared with funders and project partners for monitoring and reporting purposes (see Data Sharing and Data Retention below).

We also collect and store:

- Participant names and contact details;
- feedback received from participants via email, social media or paper feedback forms;
- equality monitoring information

To ensure data is accurate and up-to-date, paper and digital copies of the above information will be removed from our systems by shredding of paper files and deletion of digital files (including backups) after four years (see Data Retention below).

2. Employees, contractors and trustees of the company:

In order to administer our relationship with employees, contractors, volunteers, directors, and trustees of the company and in order to comply with employment and tax laws we will collect and store:

- names of individuals
- postal addresses of individuals
- email addresses
- telephone numbers
- relevant financial information including invoices and banking information

This information will be maintained long enough to comply with tax and employment laws (see Data Retention below).

3. Marketing and mailing:

Our opt-in marketing mailing list contains only names and email addresses of members subscribed. The mailing list is regularly cleaned and incorrect/expired email addresses removed to ensure information held is accurate and up to date.

4. Audiences and event attendees:

Shobana Jeyasingh Dance does not directly handle show bookings and so does not store or have access to audience contact or financial information. Bookings for ticketed shows are handled by the presenting venues.

Audiences may optionally provide feedback on our shows, which can be provided anonymously and is shared in anonymised summary form with funders, promoters and other performance project stakeholders. Feedback quotes provided by audience members may be used in company publicity with consent.

This section of the policy will be reviewed should Shobana Jeyasingh Dance directly handle audience bookings for an event or performance.

5. Donor information

In order to administer our relationship with individual donors and supporters of the company we will collect and store:

- names of individuals
- postal addresses of individuals
- email addresses
- telephone numbers
- relevant financial information including payment information

The majority of our donors donate via the Charities Aid Foundation (CAF) which collects and securely stores financial and contact information in line with its own security and privacy procedures, which donors are made aware of at the time of giving via CAF. Donors making online donations via PayPal are also made aware of PayPal's own security and privacy procedures at the time of giving.

Donors are asked not to give credit card information directly to SJD staff. If a major donor requests a purchase be made (eg to a performance or event) on their behalf and it is unusually not possible for the donor to make this payment themselves, the booking should be made using the SJD debit card and the donor should refund SJD immediately via PayPal.

Donor contact information will be periodically cleaned and updated. Donor financial information will be maintained long enough to comply with tax and employment laws (see Data Retention below).

SECURITY AND DATA PROTECTION

Personal data is protected from unauthorised access or use, and accidental loss or damage. We seek to ensure adequate security for both paper and electronic records as outlined below.

Sensitive personal data is kept on a password-protected computer server which is kept in a room that is locked at night. Access to sensitive data is limited by password to senior staff members (the Executive Director, Producer, Company Administrator, Learning Manager and Participation Manager, Head of Marketing, Development Consultant and Finance Manager). Freelance dance artists, learning tutors and contractors who are not members of the senior staff do not have access to the server.

Paper filing is kept in a locked cupboard in a secure office

Access to personal information (including health information) is limited to those who need to know, in order to ensure safe working practice and compliance with our Health and Safety policy. This may include the Shobana Jeyasingh Dance Learning Manager and Participation Manager, and freelance staff contracted to deliver participatory projects; as well as the Artistic Director and Producer where dance artists engaged on SJD productions have disclosed health issues.

Information shared with freelance staff will be limited to the relevant project and participants and will not require more general access to our files. Sensitive information will be shared via company email addresses (@COMPANY NAME.co.uk) only.

The company has a secure backup process to ensure data is maintained correctly. This is reviewed periodically to ensure continued compliance.

Any data breach will be immediately reported to the Information Commissioner's Office (ICO).

Remote working

Staff working remotely may need to download local copies of documents where working directly on the server is not practicable; in these cases, staff must ensure that final copies of documents worked on remotely are saved back to the correct place on the server and that local copies are deleted after use.

INFORMATION SECURITY PROCEDURES

Data/document category	Dept/s	Data subjects	Purpose of storage	Where stored	How secured	Who can access	Maintenance
Contracts/letters of agreement	All	Dance artists, L&P tutors, freelance contractors and suppliers	Performance of contract, documentation of engagement	Personnel folder on main server	Password-secured server	All senior staff	Stored indefinitely. Subject data access on request.
Supplier/contractor invoices	All	Dance artists, L&P tutors, freelance contractors and suppliers	Supplier/contractor payment, project records	Accounting database, paper copy for audit; project folders	Pw-secured accounting database, pw-secured server	All snr staff	Stored for 7 years to comply with HMRC requirements. Delete from project folders once reporting complete.
Contact information	All	Freelance artists, tutors and suppliers; venue contacts; learning contacts; donors; business contacts; mailing list contacts	Performance of contract (productions, L&P, marketing), donor stewardship, legitimate interest, mailing list (opt-in) and personal contact	SalesForce; project folders (project contact sheets)	Pw-secured database (SalesForce), pw-secured server	All snr staff	Contact info needs periodic updating to remove inaccurate data. File contact sheets to SalesForce after use.
Mailing list contacts	All	Friends and supporters signed up to the SJD mailing list (opt-in)	Mailing list contacts have opted in to receive SJD company information	MailChimp and SalesForce	Pw-secured platform, pw-secured database	All snr staff with passwords	Contact info needs periodic updating to remove outdated or inaccurate data. Mailing list has a double opt-in (contacts confirm they wish to be on the list). Privacy statement.
Passport/ID scans	Production, L&P, Board	Dance artists and tutors (when required), Board members (when required)	Performance of contract with venues/UKBA; required by bank for signatories	Personnel folder on main server/L&P project folders	Password-secured folder (dwg) within pw-secured server	All snr staff with pw	Delete old/out of date scans; delete scans belonging to artists/board members no longer working with SJD
Personal details forms	Production, L&P,	Dance artists and tutors (when required),	Performance of contract with venues/UKBA;	Personnel folder on main server/L&P project folders	Password-secured folder (dwg) within pw-secured server	All snr staff with pw	Delete old/out of date details forms; archive forms belonging to artists members no longer working with SJD

Data/document category	Dept/s	Data subjects	Purpose of storage	Where stored	How secured	Who can access	Maintenance
Biographies	Production/ Marketing, L&P	Dance artists, creative team members, tech crew members, Learning tutors	Publicity including print programmes	Production, L&P and marketing folders	Password-secured server	All senior staff	Periodically delete out-of-date information (request new biogs for each project)
CVs	Production, L&P	Dance artists, creative team members, tech crew members, Learning tutors	Identifying suitable collaborators and tutors	Production, L&P and marketing folders	Password-secured server	All senior staff	Archive when no longer useful
Medical information	Production, L&P	Workshop participants, dance artists and tutors (when signing up with SJD directly)	Accident/injury reporting and documentation of treatment; safe practice	Personnel folder (secure dwg) and L&P folder (secure dwg)	Password-secured folder (dwg) within pw-secured server	All snr staff with pw	Retain for 4 years in line with advice from insurers, delete when no longer required
Participant information	L&P	Workshop participants and/or parent/carers for under-16s	Performance of contract when participants sign up directly with SJD	L&P folder (secure dwg)	Password-secured folder (dwg) within pw-secured server	All snr staff with pw	Retain contact information for 2 years to allow reporting. Retain medical information as above. Use online privacy statement when participants sign up for online workshops.
Safeguarding information	L&P	Workshop participants	Documentation of safeguarding concerns	L&P folder (secure dwg)	Password-secured folder (dwg) within pw-secured server	L&P staff with pw	Retain indefinitely in case of need to report (see also SJD Safeguarding policy)
Donor information	Development and Admin	Donors (inc individuals and representatives of Trusts and Foundations)	Donor stewardship inc thank-you letters; financial management	SalesForce and accounting database	Pw-protected SalesForce database, accounting database	All snr staff with pw	Periodically clean and update contact information; retain financial information for 7 years to comply with HMRC requirements. No donor credit card information to be taken or recorded.

DATA SHARING

In cases where data is likely to be shared with third parties, consent will be obtained for specified, named third parties, for specifically defined uses, and through specified communications channels. Where data is shared for the purposes of compliance with legal obligation or performance of contract (for example, reporting to funders or commissioning partners), data subjects will be advised of this requirement.

Data will never be transferred to countries outside the European Economic Area. Our technology providers and servers are all located within the EU, and the company currently does not tour or undertake activity outside the EU. This restriction on data transfers will be noted should the company undertake work outside the EU in the future.

We will never sell participant, employee, volunteer or trustee data to any third party.

We delete personal information as soon as we have no more need for it (see Data Retention below).

DATA RETENTION

We will not keep personal data for longer than necessary for the purpose or purposes for which it was collected. In general:

- participant contact information will be retained for a period of two years to allow monitoring and reporting. Participants who wish to remain in touch after this time will be directed to join our mailing list.
- in order to comply with our Public Liability Insurance policy and our company Health and Safety policy, medical information will be retained for a period of four years and then securely deleted.

- audience feedback will be retained indefinitely or until a request is received to cease use for use in company publicity and for monitoring and evaluation purposes. Anonymised feedback will be retained indefinitely.
- our mailing list will be regularly checked and cleaned to ensure contact data is up to date. Mailing list recipients who have not opened an email or reconfirmed subscription in the past two years will be periodically cleaned.
- financial information from contractors will be retained in order to comply with accounting and tax law (currently this period is seven years).
- Donor information will be retained in order to comply with accounting and tax law (currently this period is seven years).

We will from time to time review the length of time we keep personal data for the above purposes.

When data is no longer required it will be securely deleted.

Last updated: November 2020