

PYRAMID OF ARTS

UNIT 68B BARKSTON HOUSE
CROYDON STREET
LEEDS
LS11 9RT

TEL: 0113 234 60 40

EMAIL: info@pyramid-of-arts.org.uk

WEB: <http://www.pyramid-of-arts.org.uk>



Pyramid of Arts Privacy Statement

Pyramid of Arts is a **Data Controller**. This means that we store personal information (**data**) about people, and we have a legal duty to make sure that information is secure, and that we only keep information we need in order to function safely and effectively.

This document explains:

- What information we hold about people
- Why we have that information
- How we protect that information
- What to do if you want access to information we have about you
- What to do if you want us to change or delete information about you

Who is affected?

We hold data about people who have contact with Pyramid of Arts in different ways. These are:

- Members
- Volunteers
- Young people (members or volunteers aged under 18)
- Freelance artists
- Staff
- Audiences
- Donors
- Trustees
- Staff within partner organisations, other service providers and funders with whom we have a professional relationship

Who is responsible?

The Board of Trustees have ultimate responsibility for ensuring that Pyramid of Arts operates within the law and meets its legal obligations. The Operations Manager has general day-to-day responsibility for data protection and is the designated Data Protection Officer.

Our reasons for holding data

Pyramid of Arts must have a good reason to hold personal data about you. This is called the 'lawful basis for data processing'.

Mostly, Pyramid of Arts holds personal data using the lawful basis of '**legitimate business interests**'. This means that we need to hold the data in order to do our work. For example, we need to have your name and address in order to send you information about your group / activity at Pyramid.

Sometimes, we use the lawful basis of '**consent**'. This means that we have asked your permission to hold the data, and you have said yes. For example, we ask for permission before adding anyone to our e-newsletter mailing list.

Occasionally, we use the lawful basis of '**legal obligation**'. For example, as a Registered Charity we are obliged to keep financial records for at least six years, which might include data about who we have paid or received money from.

Data retention

The law says that data mustn't be kept for longer than necessary.

We will keep data for specific retention periods where there is a legal requirement to do so (as with the financial records example, above).

Our policy for individual personal data not covered by a specific law is to keep it for five years from the individual's date of leaving. We will hold data for five years for the purposes of maintaining records in case of litigation; providing references; collating information for project evaluations and reports to funders.

We will review the data we hold annually, and securely destroy any records that have passed the retention period.

What information do we hold?

The table on the next page explains what data we hold, where and why.

There is more information about the different ways we store data below.

What?	Application form	Care needs form	Database	NAS	Email	Core worker file	Why?
Name	Y	Y	Y	Y	Y	Y	To identify you
DOB	Y		Y				To identify you
Gender	Y		Y				To identify you
Address	Y		Y			Y	To contact you
Phone number	Y		Y	Y		Y	To contact you
Email address	Y		Y		Y		To contact you
Emergency Contact (name and number)	Y		Y	Y		Y	In case you are ill / have an accident
Personal info re activities / interests	Y		Y				To understand your interests and how we fit into the picture
Communication means and needs	Y	Y	Y			Y	So we can ensure we can communicate with you and understand you in sessions
Access needs	Y	Y	Y			Y	So we can ensure our sessions are accessible to you
Photo permissions	Y		Y	Y			To make sure we only use photos of you with your permission
Training and experience	Y		Y				To decide if you are a suitable volunteer / worker and identify future training needs
References	Y		Y				To decide if you are a suitable volunteer /worker
DBS certificate number and date of issue	Y		Y				To prove we have run the check and so we know when to run another check (every two years)
Legal membership status	Y		Y				So we can identify our legal members in order to provide legal notices (e.g. of an AGM)
Personal care summary (e.g. medical or emotional needs)		Y				Y	So we can ensure our workers know what to do and how to support you
Session notes (observations about what you did in a session)			Y		Y		To monitor progress, identify issues, make adjustments to better support you, identify training needs
Sexuality			Y				Equal Opportunities Monitoring
Gender			Y				Equal Opportunities Monitoring
Ethnicity			Y				Equal Opportunities Monitoring
Religion			Y				Equal Opportunities Monitoring
Disability (Y/N)			Y				Equal Opportunities Monitoring
Mental health issues (Y/N)			Y				Equal Opportunities Monitoring
Autism / Asperger's (Y/N)			Y				Equal Opportunities Monitoring

Where do we hold information and how do we keep it safe?

In the office – Information on paper such as application forms, references and project proposals are kept in locked filing cabinets in our registered office. The cabinets can only be accessed by office staff.

In the Core Worker File – each of our groups has a 'core worker file', which is looked after by the Core Worker for that group. For groups meeting at our premises in Holbeck, these files are kept in a locked filing cabinet on site and can be accessed by the Core Workers. For groups who meet elsewhere, the Core Worker keeps the file and takes responsibility for ensuring it is kept safe (see below for more information). Files are returned to the office for safekeeping after each group project.

On our database – Pyramid of Arts owns and maintains an online database. The database is held on a cloud server. The cloud server has a built-in firewall and a security application to protect it. The database domain name has an SSL (secure socket layer) attached to it and a dedicated IP address. The SSL is provided by GeoTrust Inc and has 256bit encryption. A username and password is required to access the database. Only office staff can access the database.

On our NAS device – The computers in our registered office are connected to a Network Attached Storage (NAS) device, located in the office. The NAS and computers are password protected, and only accessible to office staff.

On email – We use gmail (part of G Suite) to manage our emails. We are satisfied that G Suite meets the requirements of the General Data Protection Regulations (GDPR) as a data processor (i.e. a service that we as a data controller use to process data). Importantly here, we can confirm that staff email addresses are password protected. When we delete an email or someone's contact details, G Suite will ensure that the data is completely wiped from all of its systems within 180 days.

(More information: <https://cloud.google.com/security/compliance/gdpr/>)

On MailChimp – MailChimp is a data processor (i.e. a service that we as a data controller use to process data). We use MailChimp to send out our e-newsletter. If you have registered to receive our e-newsletter, MailChimp will store your email address, and your first and last name (if you supplied this optional information). It will also collect and store your IP address and timestamp when you sign up – this is evidence that you have given permission for us to send you newsletters. MailChimp has Privacy Shield Certification and we are satisfied that their processes for transferring personal data meet the requirements of the GDPR.

(More information: <https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation>)

On UCheck – if you are required to undergo a Disclosure and Barring Service (DBS) check as part of your contact with Pyramid of Arts, your data will be processed and controlled by UCheck. UCheck will require a separate consent from you to process and hold your data. Pyramid of Arts is satisfied that UCheck meets the requirements of the GDPR as a data controller.

(More information: <https://hrplatform-cdn.s3.amazonaws.com/docs/Privacy%20Policy%20v2.2.pdf>)

With Core Workers – we use freelance artists to deliver our projects and contract them in the role of 'Core Worker' for our groups. Core Workers have received training from Pyramid of Arts in privacy rights and data protection. Core Workers hold data about group members and volunteers (such as contact details and pertinent health information) to ensure the safe and smooth running of our sessions. Although Core Workers are freelance workers, the contract they sign means they are bound by Pyramid of Arts' policies and procedures. Core Workers sign a specific 'Data Sharing Agreement' with Pyramid of Arts which details how they must protect data in their care, and not keep data for longer than necessary for the project.

How can I access my information?

Please write to us and ask if you would like to have a copy of the information we hold about you. This is called a 'subject access request'.

- We will respond to your request within 28 days
- You might be asked to provide proof of identity before we give you the information
- You might be charged an administration fee if you have asked for excessive or repetitive information (we will decide the cost and tell you before we proceed)

How can I change my information?

Please write to us and tell us what needs changing. We will update our records as quickly as possible, and always within 28 days.

How can I remove my information?

You can write to us and instruct us to remove any information that you have given us consent to store, by withdrawing your consent.

Some information we have about you might be held under our 'legitimate business interests'. We do not have to remove the information if we still need it to operate. If this happened, we would tell you why we needed to keep the information, and when we would be able to remove it.

How long will you keep my data?

We will review the data we hold annually and securely delete any data that has passed its retention period (see above).

Write to: The Data Protection Officer
 Pyramid of Arts
 68B Barkston House
 Croydon Street
 Leeds LS11 9RT

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