

# BARE BONES

Children's workshops | YOUTH THEATRE

**FUN EDGY DIFFERENT CONFIDENT**

## Bare Bones Drama: Data Protection Policy in accordance with GDPR EU law

### **Introduction:**

Bare Bones is fully committed to compliance with the requirements of the GDPR EU law, which came into force on 25<sup>th</sup> May 2018. Bare Bones will therefore follow procedures that aim to ensure that all employees, consultants, partners, volunteers or others who have access to any personal data held by or on behalf of Bare Bones, are fully aware of and abide by their duties and responsibilities under the Act.

### **Statement of policy:**

In order to operate efficiently, Bare Bones has to collect and use 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 Bare Bones activities
- Current, past and prospective employees, sessional workers and volunteers
- Partners and funders, including individuals and private and statutory organisations
- Suppliers, institutions and other relevant companies.

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

To this end, Bare Bones fully endorses and adheres to the Principles of Data Protection as set out in the GDPR.

### **Guidelines and Procedures**

Anyone accessing or processing personal information must adhere to the following principles which will ensure the information is fairly and lawfully 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 16). Bare Bones will clearly state how the information will be used.
- Bare Bones will handle individuals' personal data only in ways they would reasonably expect.
- Bare Bones will not pass any details on to other parties, including funders, that will allow the individual to be identified.
- If Bare Bones is asked to pass on information that may identify an individual to other parties, including funders, Bare Bones will seek clear consent from the individual (or guardian if under 16) before passing on the information.
- Bare Bones will collect information that will enable us to fulfil our operating purposes, including information that will allow us to:
  1. Contact our members, partners, volunteers, staff, suppliers and community members
  2. Identify appropriate activities for members

3. Assess the needs of members to ensure the well-being, safety and inclusion of all those who interact with Bare Bones
4. Assess demographic and equal opportunities data to help us monitor our effectiveness as an organisation.

#### **Member and Staff Data:**

- Bare Bones will store member details in paper format through registration forms, session registers and, if necessary, disclosure forms.
- Bare Bones will store member details in electronic format through online/electronic database and electronic files.
- Bare Bones will store staff and volunteer details in paper format through contact sheets, contracts/agreements, staff details forms, applications, DBS certificates and CVs.
- Bare Bones will store staff and volunteer details in electronic format through online/electronic database and electronic contact sheets.
- The Bare Bones database will be updated regularly to ensure information is current and correct.
- Bare Bones will issue registration forms (electronically) at the beginning of each academic year to capture up to date details. The information of active members will be updated on the database at the start of each academic year.
- The information of non-active members will be updated at the start of each academic year.
- The information of partners, staff, volunteers and community members mailing list will be updated based on individual feedback from mailing list members annually and not kept for longer than is necessary.
- Bare Bones will store member details in paper format during the time that members are active with Bare Bones.
- Member information in paper format will be archived annually. Archived information will be destroyed after 5 years.
- Information of staff and volunteers no longer active with Bare Bones will be archived annually. Archived information will be destroyed after 5 years.
- Bare Bones will store members details in electronic format for 5 years from the last date that the member was in active communication with Bare Bones. After 5 years, Bare Bones will delete members' details from all electronic/online databases, including mailing lists.
- Bare Bones will keep an electronic mailing list. All those who interact with Bare Bones will be given the option to decline being added to the mailing list. Details of how to be removed from this list will be clearly laid out at the bottom of each communication. Details of staff, volunteers, partners and community members will be retained on the mailing list unless they ask to be removed and processed in line with your rights
- Bare Bones will process all data in line with individuals' statutory rights.
- Bare Bones will respond to an individuals' requests to access a copy of the information.
- Bare Bones holds, and to any objections to the processing of their own data, as required by law.
- Secure, personal information in paper format will be stored in a locked space. Electronic information will be stored on an encrypted password-protected database and a secure IT storage system, which only Bare Bones staff can access.
- All email communication will offer an option to opt out of Bare Bones mailing lists in accordance with the GDPR rules on 'consent' and 'transparency'.

Bare Bones does not foresee a need to ever transfer data outside the EU. In the event that this need occurs, Bare Bones will comply with the legal requirements laid out in the GDPR.

**Internet Data:**

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

Bare Bones maintains a Facebook, Twitter and Instagram account, which includes as 'Friends' or 'Followers', current Bare Bones members, past members, staff & tutors and other professional partners. Bare Bones 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.

- Bare Bones 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 Bare Bones projects.
- Electronic personal details (including emails, electronically stored phone numbers, etc.) will be deleted from staff's personal communication devices when employment or membership ends.
- Bare Bones staff and volunteers will not email, phone, text, Facebook, Tweet or otherwise contact Bare Bones members directly to promote or recruit for projects outside of Bare Bones.
- Bare Bones staff and volunteers will not 'Friend' or accept as a 'Friend' a Bare Bones member onto their personal Facebook account, or otherwise connect with an Bare Bones member on other social media sites.
- Bare Bones will not share members' posts on Bare Bones organisational social media platforms unless the post relates to the members' interaction with Bare Bones.

Under the GDPR regulations, you have the right to request to know what specific data we hold about you, and to ask to be removed from our systems. Whilst we will adhere to any requests and the regulations specifically aimed at email communications, we would advise that we would always need up-to-date contact information should your child be left in our care at any time.

To request your data, you will need to contact us by emailing [info@barebonesdrama.com](mailto:info@barebonesdrama.com) with the subject 'Right to Data Request'.