



# Helix Arts Data Management Policy

## 1. Context and overview

### Key details:

- Policy prepared by: Rowena On, Head of Operations
- Approved by Board of Trustees: 24 May 2018
- Policy became operational on: 24 May 2018
- Next review date: 1 July 2020

### Introduction:

Helix Arts needs to gather and use certain information about individuals.

These can include participants, employees of partner organisations, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

The Helix Arts Privacy Notice is available on our website at <https://www.helixarts.com/privacynotice.php> or by request.

### Why this policy exists:

This data management policy ensures Helix Arts:

- Complies with data protection law and follows good practice
- Protects the rights of participants, staff and partners
- Is transparent about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

## **Data protection law:**

The General Data Protection Regulation (GDPR) applies in the UK and across the EU from May 2018. It requires personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of individuals;
6. Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
7. The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

## **2. Who? – people and responsibilities**

Everyone at Helix Arts contributes to compliance with the GDPR.

### **The Head of Operations will:**

- Keep senior management and Trustees updated about data protection issues, risks and responsibilities;
- Document, maintain and develop the organisation's data protection policy and related procedures;
- Share the policy across the organisation and arrange training and advice for staff as appropriate;
- Deal with subject access requests, deletion requests and queries about data protection related matters;
- Check and approve contracts or agreements with third parties that may handle the organisation's sensitive data;

- Ensure all systems, services and equipment used for storing data meet acceptable security standards;
- Develop privacy notices to reflect the lawful basis for fair processing, ensuring that intended uses are clearly articulated, and that data subjects understand how they can give or withdraw consent, or else otherwise exercise their rights in relation to the use of their data by Helix Arts.

### **3. Scope of personal information to be processed**

Helix Arts will process some or all of the following data, depending on the requirements of the programme of activity:

- Names of individuals
- Postal addresses of individuals
- Email addresses of individuals
- Telephone numbers of individuals
- Age of individuals, including date of birth
- Gender of individuals
- Ethnicity of individuals
- Information on physical and/or mental health

The data will be collected by individuals via one of the following methods:

- Telephone conversation
- Face to face conversation
- Email conversation
- Online form / survey
- Printed form / survey

The data will be stored:

- On Helix Arts' computer-based system, which is password protected and accessible only by employees of the organisation (see item 7 below), and/or
- Printed copies kept in a locked cabinet.

Data will be collected only if it is relevant to the purpose and will not be kept once the programme of activity and all related reporting to funders, partners, etc. is complete.

When the requirement to hold the data has passed it will be deleted from the computer-based system and printed copies shredded using the secure shredding service.

#### 4. Uses and conditions for processing

<b>Outcome/Use</b>	<b>Processing required</b>	<b>Data to be processed</b>	<b>Conditions for processing</b>	<b>Evidence for lawful basis</b>
Programme of activity initial Registration	Completion of registration form online / face-to-face / via telephone	Name, address, date of birth, relevant medical conditions (as appropriate)	Consent	Self-completion or verbal consent (with written record)
Programme of activity Register of Attendance	Completion of register by artist / support worker / Helix Arts personnel	Name, age, gender, ethnicity, disability, postcode	Consent	By signature or verbal consent (with written record)
Programme of activity report of feedback to funders	Completion of feedback questionnaire face-to-face / via telephone	Name, age, gender, ethnicity, disability, postcode, relevant medical conditions (as appropriate)	Consent	By signature or verbal consent (with written record)
Updates to Artists	Mailchimp email using name and email address details from artists list	Name and email address details	Consent	Mailchimp sign-up or email permission
#HADADi Invitations	Mailchimp email using name and email address details from artists list	Name and email address details	Consent	Mailchimp sign-up or email permission
ACE Annual Reporting	Completion of diversity questionnaire online by artists	Gender, age, ethnicity, disability	Consent	Completed form
Payment of Contractors (including Artists)	Provision of bank account details	Account name, sort code and account number	Consent	Written bank details (on invoice)

## 5. Privacy Impact Assessments

Helix Arts will process data by entering it onto computer-based systems in the form of documents, spreadsheets, email contacts, and Mailchimp lists. This information stored in this way will only be accessible by legitimate users of the Helix Arts computer systems (employees, freelance associates, and volunteers).

The data will only be used for the following purposes:

- Contacting individuals and organisations to provide relevant information on Helix Arts and its work.
- Monitoring and evaluation of Helix Arts' programme of activity.
- Reporting to funders in relation to Helix Arts' programme of activity.

Data will be deleted from the system immediately as a result of any of the following:

- Receipt of a request to be forgotten from the data subject or legal guardian.
- The end of the programme of activity, providing the data is no longer required for reporting and evaluation.
- After the final report is made to funders.

Risks to data will be constantly reviewed and steps taken to remove or mitigate any identified risks, including:

- Ensuring that the systems and devices used to store electronic data require a strong password to enable access.
- Ensuring that no Helix Arts' passwords are shared outside the organisation.
- Ensuring that printed copies of data are kept in a locked cabinet in the office.
- Ensuring that data is only taken away from the office if required for the safety and wellbeing of the individual and that, in such circumstances, it remains in the control of a member of staff or contractor at all times.

## 6. Data Sharing

Helix Arts will only share personal data with the following third parties:

- Partner organisations
- Contractors, including artists and evaluators
- Funders

Explicit consent will be obtained for the sharing of data at the time the data is recorded, or failing that, prior to the data being shared. We may anonymise data for use in reporting and analysis.

## **7. Security measures**

Helix Arts will store personal data within its Google Cloud account, access to which is restricted to employees and contractors. A daily backup of this account is performed using Spanning Backup.

Data will also be stored within Helix Arts' Dropbox account, which is accessible only via the Helix Arts secure login. Such data may also be shared with partner organisations and contractors at Helix Arts' specific invitation.

Helix Arts' employees may access the data via a range of devices, both office-based and roaming, but all such devices will require a password / passcode for access and will not be shared with non-authorised third parties.

Helix Arts maintains robust anti-virus and anti-intrusion software on its systems and carries out frequent audits of its systems to ensure that any unauthorised access would be quickly identified and blocked. In the event that unauthorised access did occur, any data breach would be identified and reported to the ICO within the required timescale.

Data to be removed is deleted from the live system, and will normally be purged from the backup system 30 days after that. Any printed data to be removed is placed in the secure shredding system and destroyed within 8 weeks.

## **8. Automated processing**

Helix Arts does not carry out any automated processing of individual's data.

## **9. Subject access requests**

All individuals who are the subject of data held by Helix Arts are entitled to:

- Ask what information Helix Arts holds about them and why
- Ask how to gain access to it
- Be informed about how to keep it up to date
- Be informed about how the company is meeting its data protection obligations

Subject access requests should be made in writing to the Head of Operations at Helix Arts.

Such requests will be processed within the required timescale.

## **10. The right to be forgotten**

Right to be forgotten requests should be made in writing to the Head of Operations at Helix Arts.

Such requests will be evaluated within the required timescale and all data deleted or destroyed, except where it is necessary to retain data anonymously for monitoring or reporting purposes.

## **11. Privacy notices**

Helix Arts aims to ensure that individuals are aware that their data is being processed, and that they understand:

- Who is processing their data
- What data is involved
- The purpose for processing that data
- The outcomes of data processing
- How to exercise their rights.

To these ends the company has a privacy Notice, setting out how data relating to these individuals is used by the company.

The Privacy Notice is available on request and on the Helix Arts website at <https://www.helixarts.com/privacynotice.php>.

## **12. Ongoing documentation of measures to ensure compliance**

Meeting the obligations of the GDPR to ensure compliance will be an ongoing process.

Helix Arts will:

- 1) Maintain documentation / evidence of the privacy measures implemented and records of compliance.
- 2) Regularly test the privacy measures implemented and maintain records of the testing and outcomes.
- 3) Use the results of testing, other audits, or metrics to demonstrate both existing and continuous compliance improvement efforts.
- 4) Keep records showing training of employees on privacy and data protection matters.
- 5) Discuss data protection with the staff team at each fortnightly operations meeting.