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Data Management & Media Use Policy

General Statement of Policy

- It is the policy of Women & Theatre to protect the privacy of individuals about whom it holds personal information and to comply with the Data Protection Act 1998 and 2018 General Data Protection Regulations.
- Women & Theatre is registered under the 1998 Data Protection Act. Details of the current registration can be accessed at www.informationcommissioner.gov.uk
- Women & Theatre needs to collect and use certain information about people with whom it deals in order to operate. These subjects include current, past and prospective employees, freelancers, volunteers, bookers and potential bookers, suppliers, customers, advisors, research participants and project participants.
- Women & Theatre recognises its duty to ensure that all personal data is processed properly and confidentially at all times. This covers the lifecycle of processing personal data, from the point of collection to destruction, including storage, use or disclosure.
- Personal data can be any information, including images and/or sounds, relating to a living person who can be identified from that and/or other information held by Women & Theatre.
- Any personal data which Women & Theatre collects, records or uses in any way whether it is held on paper, on computer or other media will have appropriate safeguards applied to it to ensure compliance with the Data Protection Act 1998.
- W&T routinely reviews its methods for storing and processing data to ensure adequate safeguards to minimise risk of data breach.
- To advocate the work of the Company, to attract future funding and for evaluation purposes, Women & Theatre needs to photograph and film its performances and projects. The Company also uses film and audio footage as part of some programmes of work.
- Such recordings of its artists and participants will be made in accordance with the rights of individuals as detailed in the Company's Safeguarding and Data Management policies.
- Images & recorded media are stored on W&T password-protected devices and computers. W&T Staff all have W&T laptops for use in office, at home & in delivery contexts.

Data Protection Principles

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 the initial purposes
3. Adequate, relevant and limited to what is necessary in relation to the purpose 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 or than is required by statutory law; 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.

Responsibility

- W&T's Board of Directors take ultimate responsibility for the setting, review and monitoring of W&T's Data Management Policy.
- The General Manager is responsible for drafting and revising the policy, and for recommending it to the Board of Directors minimum every 3 years.
- Everyone at Women & Theatre contributes to compliance with GDPR. Our team support the implementation of compliance of GDPR in the following ways:
 - Keeping senior management and board updated about data protection issues, risks and responsibilities
 - Documenting, maintaining and developing the organisation's data management policy and related procedures, in line with agreed schedule
 - Embedding ongoing privacy measures into policies and day to day activities, throughout the organisation.
 - Dissemination of policy across the organisation, and arranging training and advice for staff.
 - Dealing with subject access requests, deletion requests and queries from clients, stakeholders and data subjects about data protection related matters.
 - Checking and approving contracts or agreements with third parties that may handle the company's sensitive data.
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly
 - Evaluating any third party services the company is considering using to store or process data, to ensure their compliance with obligation under the regulations
 - Developing privacy notices to reflect 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 Women & Theatre's use of their data.
 - Ensuring all audience development, marketing, fundraising and all other initiatives involving processing personal information and/or contacting individuals abide by GDPR principles.

Data Protection Officer (DPO)

Jess Pearson, General Manager, is responsible for fulfilling the tasks of the DPO for Women & Theatre. Their responsibilities are:

- To inform and advise the organisation and its employees about their obligations to comply with GDPR and other data protection laws

- To monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal audits.
- To be the first point of contact for supervisory authorities and for individuals whose data is processed.

Scope of personal information to be processed

Women & Theatre may process the personal data of subjects that may include their names, postal addresses, email addresses, telephone numbers and in some cases, dates of birth, bank details and national insurance numbers.

Sensitive data will only be accessible to the members of staff who require the data to complete tasks which the subject has approved of. We will use our database to correctly label and organise people's data so it is used correctly, paying particular attention to data that is sensitive and individual's preferences in regards marketing, fundraising and projects. Should an individual submit a subject access request Women & Theatre will make this information available in a law-abiding manner.

Consent

When obtaining consent for the use of data individuals are asked to specify how they wish their data to be used. Consent can be given via our website, email, verbally or in hardcopy and a record of the date and method consent was given is also kept. All data is collected as an opt in basis and is not a condition of sale and all individuals have the option to opt out. Should a person choose to opt out of our mailing, this will be enacted on within 1 working week.

Data Sharing

Women & Theatre will never disclose, share or sell personal data to a third party without express written consent. On occasion, when we feel it is off benefit to the individual involved, we may wish to share information with one of our partners, on those occasions we will ask for written consent, with a full break down of who we will share data with, why and for how long.

Security measures

To make sure any data shared with us is secure, Women & Theatre will store this information on encrypted and password protected database or password protected documents. Only authorised staff members will have access to this data and computers will be locked when a member of staff leaves their desk. Any data that is stored in hard copy will be kept in a locked cabinet, with only authorised members of staff having access to this information.

Automated processing

Women & Theatre do not currently operate any form of automated processing, should we decide to conduct such a practice in future, individuals affected will be notified and given the option and full details of how they can opt out.

Subject Access Request

All individuals who are the subject of data held by Women & Theatre are entitled to

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

Should you wish to submit an access request or have any other questions about our data protection policy please email info@womenandtheatre.co.uk and our Data Protection Officer will respond to your request.

The right to be forgotten

In certain circumstances, subjects have the right to be deleted from W&T's database and other records. If an individual wishes for this process they should contact the Data Protection Officer on the above email

address. The data protection officer will then explain the process for how their data would be deleted and what data may still be stored anonymously.

Privacy notices

W&T 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 statement, setting out how data relating to these individuals is used by the company.

Media Use

Women & Theatre does not make audio, video or photographic records without the permission of the individual/s. Permission will be sought from the individual in written form which is GDPR compliant. Each form is written specifically for that particular project and will fully explain how the media will be used and for how long.

Consent

The consent will be valid for a maximum of 10 years and/ or when the media content is no longer required, whichever is sooner. After this period any personal data will be securely deleted from our systems. An individual may withdraw their consent and stop Women & Theatre from using media content of themselves in new material at any time; however removal of their image or footage featuring them from existing published material or completed pieces of film or podcast work may not be possible.

Procedure

Artists

Women & Theatre obtains permission of its artists within their contract of engagement.

Children & Young People

In the case of young people and children, written permission is sought from the relevant parent or guardian. A full description of how we intend to use the media is provided on each form. The form gives clear options to both give and not give permission.

Adults

Written permission is sort from adult participants at the start of the project. They are handed a media form with a full description of how we intend to use the media, which gives clear options to both give and not give permission. In some cases, e.g. with adults at risk, additional permissions are sought from a carer or support worker.

In all cases, Women & Theatre will retain the written permission for as long as the photographs/videos are used & permissions are in place.

Audiences

Occasionally we made need to seek media permissions from our audience i.e. if the performance is being recorded. In such a situation the audience will be informed verbally and a sign displayed, explaining that if they do not wish to be filmed, they can speak to an appropriate member of staff, e.g:

This performance is being filmed/ photographed which may include some shots of the audience. If you are not happy to be filmed/ photographed, please tell a member of staff/[Insert name].

This sign will be translated into other languages as appropriate.

Approved by W&T Board of Directors on 17 August 2021.



Privacy Statement

Scope:

This Privacy Statement was established by Women & Theatre with regards to how we use personal information gathered in the course of our project delivery, hiring and all electronic media. It applies whenever you and Women & Theatre interact if there is a possibility that, during such interaction, we may acquire certain information about you.

Principles

Women & Theatre is committed to protecting your privacy. We will make every effort to ensure that our staff use and treat personal information lawfully and correctly. To this end, we fully endorse and adhere to the principles of data protection as set out in the UK Data Protection Act 1998 (the 'Act'). We also ensure our procedures are compliant with the 2018 General Data Protection Regulations (GDPR).

In particular we will:

- Observe the conditions in the Act regarding the fair collection and use of personal information;
- Collect and process personal information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirement;
- Ensure the accuracy of any personal information kept by us;
- Take appropriate technical and organisational security measures to safeguard personal information.

What information do we collect?

The way in which you interact with us as an organisation will affect what data we hold about you. This could include:

- Audience members' names and contact details
- Participants' names and contact details (we may require additional information depending on the project)
- Employees' date of birth, NI and payment details
- Job applicants' details might be kept for future reference
- Donor names, contact and bank details

The above list is non exhaustive. All this information is stored securely in accordance with the Act.

How do we use the information we collect?

We will only ever use the information for the purpose you expressly gave us the data for:

- If this is for marketing purposes we will add you to our mailing list and contact you at regular intervals to inform you of the company's activities;
- If this is for fundraising purposes, you will receive communications about fundraising campaigns and activities.
- If you are a participant in a project, we will use it to contact and inform you about that project. All information will be securely kept in compliance with the Act.

Children

Parts of Women & Theatre work will be of interest to children. Any information we do gather about children and young people, will be done so only with the consent of a parent or guardian. We do not send unsolicited emails to users who we know to be under 16. All our privacy procedures are compliant with safeguarding protocol.

When do we share your information?

Women & Theatre will NEVER sell your personal information to others. We will NEVER share your email address or telephone number without your express permission.

Any third parties who access your data in the course of providing services on our behalf (for example, credit card processing, database hosting) are subject to strict contractual restrictions to ensure that your data is protected, and in compliance with applicable data protection/privacy legislation.

Please note that we reserve the right to access and disclose personal data to comply with applicable laws and lawful government requests and to protect both ourselves and our users.

How Long Are Your Personal Details Retained?

We will maintain records and personal contact information for as long as there is a reasonable likelihood of you using a W&T service. We, from time to time, purge electronic records of audiences, participants and ex donors.