

DATA PROTECTION POLICY

Updated March 2018



Introduction

This policy is an internally focused document, telling AHSW employees what they may do with data (personal information) that is collected and processed by AHSW. Different members of staff have different levels of access to this data, as is laid out in this document.

Who we are

Arts and Health South West (AHSW) is a registered charity based in the UK. We are a free membership organisation, funded by Arts Council England.
(Registered Charity number 1115339, company limited by guarantee number 5420987.)

Our Data Protection Officer is:

Hannah Mumby, General Manager of AHSW (info@ahsw.org.uk)

Our Trustee overseeing Data Protection is:

Paul Dieppe (P.Dieppe@exeter.ac.uk)

What data we collect:

Members

Name, email address, job title, organisation, address.

Staff

Name, email address, date of birth, correspondence address, NI number and bank account details

Trustees

Name, email address, date of birth, correspondence address.

Who are our Staff?

Director – Alexandra Coulter

General Manager – Hannah Mumby

Freelance Finance Assistant – Sarah Holmes

Art & Social Change Project Researcher, and Catalyst Project Officer – Catherine West

Administration Assistant – Faith Biddle

(Last updated – March 2018)

Who has access to the data?

Members

Director, General Manager

Staff

Director, General Manager, Finance Assistant

Trustees

Director, General Manager

Ways in which AHSW Staff may process this data

Members

- To send the monthly e-Bulletin via email
- To contact the member about any issues with their account
- To analyse internally for anonymised reporting i.e. on member statistics
- To assist with enquiries, e.g. if someone contacts us to enquire whether there are any music therapy organisations in Bristol – the General Manager would search the members database and share names of organisations with the enquirer, but no contact details.

Staff

- To communicate with staff for any work business
- To process and pay monthly salary payments or invoices if freelance via the accounting software and online banking software
- To share access to AHSW file storage via cloud
- To send digital invitations to meetings
- To share digital calendars
- For inclusion on Companies House registers where appropriate (depending on role)

Trustees

- To send anonymised yearly reports to the Charity Commission, HMRC, Companies House, and our main funders, Arts Council England*.
- To send the monthly e-Bulletin via email
- To process and pay expenses via the accounting software and online banking software
- To send digital invitations to meetings
- To share digital calendars

*These details are described below:

Official Body / Organisation	Data we report to them
Charity Commission	Full name, Address, Date of Birth and Age, Job Title.
Companies House	Full name, Address, Date of Birth and Age, Job Title.

HMRC	?
Arts Council England	<u>Anonymised:</u> Age bracket, Gender, Sexual Orientation, Ethnic Background.

Where we store the data

Members

- Mailchimp 2-factor authenticated database

Staff

- Within staff email programmes and digital address books/contacts app
- Within the Xero accounting system (bank details)
- Within the Online Bank Account System (bank details)

Trustees

- Within staff email programmes and digital address books/contacts app
- Within the Xero accounting system (bank details)
- Within the Online Bank Account System (bank details)
- On a password-protected database within a 2-factor authenticated cloud system

Who the data is shared with

Staff

For freelance or sub-contracted workers, we will share their data with employees within Arts and Health South West who handle admin, management and finance tasks relating to the individual's employment.

For Payroll employees, in addition to the above we will also need to share the person's data with our Accountants, who manage our Payroll for us.

Our accountants are:

Edwards & Keeping Chartered Accountants, Unity Chambers, 34 High E St, Dorchester DT1 1HA

Staff details will **not** be shared with additional third parties aside from our Accountants.

Trustees

We will share Trustees' data with employees within Arts and Health South West who handle admin, management and finance tasks relating to the organisation.

Trustees are also Directors of AHSW for Companies House, which means their full name, job title and correspondence address is displayed (and publicly accessible) in Companies

House records, and is included in the Statutory Registers Registers – a printed copy of which are held at AHSW’s accountants premises, and at a secure registered address, and a digital copy of which is held on AHSW’s cloud storage.

Trustees details will **not** be shared with additional third parties.

Members

By signing up via Mailchimp, members agree to have their data held and processed by Mailchimp as per their privacy policy, accessible here: <https://mailchimp.com/legal/privacy/>

Members are also ‘Members’ of AHSW for Companies House, which means their full name and correspondence address is included in the Statutory Registers – a printed copy of which are held at AHSW’s accountants premises, and at a secure registered address, and a digital copy of which is held on AHSW’s cloud storage.

Members’ details will **not** be shared with additional third parties.

How long we keep the data

Staff

We will keep staff data throughout the duration of their employment. After their employment, their contact details will be retained by AHSW in staff’s digital address books in case of future contact. Their bank details (for outgoing payments) will remain on the online Xero accounting software and Online Banking Systems, unless requested to be removed.

Trustees

We will keep Trustee data throughout the duration of their trusteeship. After their trusteeship has ended, their contact details will be retained by AHSW in staff’s digital address books in case of future contact. Their bank details (for outgoing payments) will remain on the online Xero accounting software and Online Banking Systems, unless requested to be removed.

Members

We will Member data throughout the duration of their membership, for up to 10 years, unless the organisation closes down OR an individual explicitly requests for their data to be removed from our system.

What to do if people want us to remove their data completely

If an individual wants AHSW to stop holding their data, and delete it permanently from our records, they are advised in our Privacy Notice to contact Hannah Mumby, General Manager of AHSW to request this, on (+44) 01392 793877 or info@ahsw.org.uk (and to put ‘URGENT – Data Request’ in the email subject). Upon receipt of this request, the General

Manager will then delete their data within 30 days. This will involve removing it from the Mailchimp database and the Statutory Registers (digital and print copies).

When the General Manager has deleted this data, they will need to keep a 'skeleton record' on the AHSW database, with the individual's name, and a flag which says "data permanently removed", to make sure we have recorded that this has been processed.

General Best Practice

- It is recommended that any AHSW staff doing work on trains or in public places should purchase 'Privacy Screens' for their computers so that people sharing the space cannot read any emails, documents etc. over their shoulder.
- AHSW management advise staff to be careful about having phone conversations in public places which might involve contact details or other information that AHSW might want to safeguard.

Record of Updates

Date last updated: 16th March 2018

Signed:

Hannah Mumby, Data Protection Officer and General Manager of AHSW

Paul Dieppe, Named Trustee of AHSW overseeing Data Protection.