



GDPR Policy

This policy was adopted on 16th August 2022
This policy is due for review on 16th August 2023
This policy was updated on 05/09/23

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POLICY STATEMENT

Art Inc values the healthy positive relationships we build. We work with young people, families, partner schools, referring establishments and multi-agencies. Art Inc will not share information with alternate parties unless for safeguarding or by way or agreed promotional documentation by the young person/families consent.

The GDPR policy is to ensure compliance with The Data Protection Act 2018

<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

AIMS & OBJECTIVES

The aims and objectives of the GDPR policy is to outline the legal data protection aspects of Art Inc. Art Inc complies with the European General Data Protection Regulation (GDPR) and Data protection Act (DPA) 2018..

Art Inc follow our data protection principles.

Our DPO;Data Protection Officer: Sonya Hyde

Art Inc have a continuous commitment, reviewed annually to the

- Improvement of a data protection management system
- Training, sensitisation and obligation of the employees

- Safeguard young people

THE TYPE OF INFORMATION WE COLLECT

The information we gather depends on whether it be a staff member or a service user, but may include:

Service User

- identity - name, date of birth, preferred pronouns, family details
- contact - address, email address, phone numbers
- education - student school details including specific needs, attendance and engagement
- Art Inc services data - services used
- visual images

Staff:

- identity - name, date of birth, preferred pronouns, passport, national insurance number, family details
- contact - address, email address, phone numbers
- education - qualifications, courses
- financial - bank account, salary, benefits
- staff records - pensions, appraisals, nationality
- visual images
- business activities - employment, licences and permits held
- A copy of your EDBS

HOW WE WILL USE THE INFORMATION YOU PROVIDE

We use your data to:

- deliver and manage the services and support we provide to you
- respond to enquiries or complaints
- promote our service to expand provision
- train and manage employees or volunteers who deliver those services
- monitor the quality of our services
- research and plan new services.
- Safeguard young people and staff

We will use THE INFORMATION YOU SHARE if:

- Legal obligation: to comply with the law (not including contractual obligations).
- Workshops with young people, or because young people and/or their families have asked us to take specific steps before engaging in art workshops.
- Vital interests: to protect someone's life.
- Legitimate interests: to protect the interests of Art Inc or someone else unless there is a good reason to protect your data which overrides those other interests.
- Consent: you have specifically agreed to our use of your data and we have no other legal basis for processing it.

We will use your SPECIAL CATEGORY DATA in the following circumstances, where processing:

- is with your explicit consent
- is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law
- is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent
- relates to personal data which is manifestly made public by the data subject
- is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- is necessary for reasons of substantial public interest
- is necessary for the purposes of preventive or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care, or treatment or the management of health or social care systems and services.

SECURITY

- Staff will lock screens on devices or laptops when not in use
- Paper documents containing personal data will be locked in the DSL/DPO office
- Staff will follow sharing & communication protocols

INFORMATION TRANSFER & COMMUNICATION

Art Inc may share information under the above circumstances via encrypted/protected methods. Special Category data will always be encrypted unless safeguarding would be compromised by doing so.

Staff will pseudonymisation data unless safeguarding would be compromised by doing so.

Emails using data may be sent using Egress <https://reader.egress.com/> or Voltage encrypted end to end and password protected.

DATA BACKUP

Art Inc will back up their data monthly

MONITORING

Art Inc's DPO will carrying out annual data protection impact assessments using the tools on the Information Commissioner's Office UK website

<https://ico.org.uk/for-organisations/sme-web-hub/checklists/data-protection-self-assessment/>

Staff are inducted and receive annual training on GDPR

Art Inc will carry out annual internal inspections using the EU tool.

<https://gdpreu/checklist/>

DATA BREACH

If there's a data breach and personal data is exposed, Art Inc will notify the ICO within 72 hours The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals..

Art Inc will quickly communicate data breaches to our data subjects unless the breach is unlikely to put them at risk (for instance, if the stolen data is encrypted).

FINAL STATEMENT

Art Inc is committed to collecting, using and disposing of your data safely, appropriately and effectively. Art Inc will not hold data unnecessarily once you have ceased working with us, unless safeguarding is compromised. The values of Art Inc underpin our policies

- Empathy
- Nurture
- Clear Boundaries (following GDPR guidelines & legislation)
- Dreams

