

Elmsgrove Community Arts CIC
Data Protection Policy
Adopted on: 9th June 2025

1. Policy Statement

Elmsgrove Community Arts CIC (“ECACIC”) is committed to handling personal data with the utmost integrity, confidentiality, and care. This policy sets out our principles for collecting, processing, storing, and disposing of personal information in accordance with data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We aim to ensure all data is managed lawfully, fairly, transparently, and with full respect for the rights and privacy of individuals.

2. Scope

This policy applies to all individuals whose personal data we process, including:

- Service users and members of the public
- Employees, contractors, and volunteers
- Job applicants
- Suppliers and partners

It covers all personal data, whether collected or stored electronically, on paper, or by other means.

3. Who is Covered

This policy must be adhered to by:

- All employees, contractors, and volunteers working with or on behalf of ECACIC
- Any external individuals or organisations acting under the authority of ECACIC with access to personal data

4. Definitions

Personal Data: Any information relating to an identifiable individual (data subject).

Processing: Any operation involving data, including collection, storage, alteration, and

deletion.

Data Subject: The individual to whom the personal data relates.

Data Controller: ECACIC, determining how and why personal data is processed.

Data Processor: Any third party processing personal data on ECACIC's behalf.

5. Principles of Data Protection

We are committed to ensuring personal data is:

- **Lawfully, fairly and transparently processed**
- **Collected for specified, explicit and legitimate purposes**
- **Adequate, relevant and limited to what is necessary**
- **Accurate and kept up to date**
- **Stored only as long as necessary**
- **Handled securely**, using appropriate technical and organisational measures

We will not:

- Share personal data informally
- Transfer personal data outside the UK without appropriate safeguards
- Retain data longer than necessary
- Disclose data to third parties without consent, unless required by law

6. Rights of the Data Subject

ECACIC respects the rights of individuals to:

- Be informed about how their data is used
- Access their personal data
- Rectify inaccurate or incomplete data
- Request erasure of personal data ("the right to be forgotten")
- Restrict or object to processing
- Data portability (where applicable)
- Lodge a complaint with the Information Commissioner's Office (ICO)

7. Storage and Security of Data

We store personal data collected through our community activities (e.g., registration and feedback forms) with due regard to safety and confidentiality:

- Paper records are stored in a locked filing cabinet in a secure office

- Electronic records are protected by strong passwords and access controls
- Data is only accessible to authorised personnel
- All documents are retained for a maximum of three years, unless otherwise legally required, and then securely destroyed

8. Data Protection Practices

To uphold these principles, ECACIC shall:

- Monitor and restrict access to sensitive data
- Provide training on data protection and privacy
- Encrypt and back up electronic data regularly
- Shred paper documents securely
- Include data protection clauses in contracts where relevant
- Display this policy on our website
- Report data breaches in line with ICO guidance and maintain breach response protocols

9. Breaches and Enforcement

Any violation of this policy, whether accidental or deliberate, may result in disciplinary action, including possible termination of employment or involvement with ECACIC. Serious breaches may also result in legal action.

10. Legal Framework and References

This policy is informed by:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018 (UK)**
- Guidance issued by the **Information Commissioner's Office (ICO)**

Note: This document provides a general policy framework and should be read in conjunction with relevant legal advice where necessary.

This policy was adopted by ECACIC on: 9th June 2025

Signed on behalf of the Management Committee:

Barry Elms – Director – _____

Next Review Date: June 2026

Committee Members Present at Review:

Date Name Signature