

**po box 957
wembley
ha0 9ez**

020 8537 1653
07958 65 37 25

kj@dramaworkhouse.org.uk
www.dramaworkhouse.org.uk

DATA PROTECTION POLICY

registered charity: 1078620

friends of w-w-w drama:

zee asha; ann kenton barker; sandra bee; dawn butler mp; anna chancellor;
sophie dahl; judi dench; freddie earle; clive fryde; tom graham; barbara hatwell;
keeley hawes; ken livingstone; francis magee; david massey; paul j medford;
lyn paul; alan plater; gail porter; stomp; sarah teather mp; finty williams

Data Protection Policy

the drama workhouse

1.0 Introduction

- 1.1 The Data Protection Act 1998 protects staff, volunteers, and members of *the drama workhouse* against the misuse of personal data and covers both manual and electronic records.
- 1.2 All records held on computers fall within the Data Protection Act. Certain manual files may also fall within the Act, depending on the ease of access to data within the file. However, for consistency and good practice, *the drama workhouse* will adopt the same approach for data held.

2.0 Data Protection Principles

- 2.1 Personal data shall be processed fairly and lawfully.
- 2.2 Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- 2.3 Personal data shall be adequate, relevant, and not excessive in relation to the purpose or purposes for which they are processed.
- 2.4 Personal data shall be accurate and, where necessary, kept up to date.
- 2.5 Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 2.6 Personal data shall not be processed in accordance with the rights of data subjects under the Data Protection Act of 1998.

- 2.7 Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

3.0 Our Commitment to Participants

- 3.1 We aim to ensure that:

- 3.1.1 We comply with the data protection principles.
- 3.1.2 We meet our legal obligations as laid down by the Data Protection Act 1998.
- 3.1.3 Data is collected and used fairly and lawfully.
- 3.1.4 We process personal data only in order to meet our operational needs or fulfil legal requirements.
- 3.1.5 We take steps to ensure that personal data is up-to-date and accurate.
- 3.1.6 We establish appropriate retention periods for personal data.
- 3.1.7 Data subjects' rights can be appropriately exercised.
- 3.1.8 We provide adequate security measures to protect personal data.
- 3.1.9 A nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
- 3.1.10 Every member of staff is made aware of good practice in data protection.
- 3.1.11 We provide adequate training for staff responsible for personal data.
- 3.1.12 Everyone handling personal data knows where to find further guidance.

- 3.1.13 Queries about data protection, internal and external to the organisation, are dealt with effectively and promptly.
- 3.1.14 We regularly review data protection procedures and guidelines within the organisation.
- 3.2 The Act also gives employees certain rights. For employment purposes, the most important right is the right to access the personal data held about the employee.

4.0 Purposes for which Personal Data may be Held

- 4.1 Personal data relating to staff and volunteers may be collected primarily for the purposes of:
 - 4.1.1 Recruitment, promotion, training, redeployment and / or career development.
 - 4.1.2 Administration and payment of wages.
 - 4.1.3 Calculation of certain benefits including pensions.
 - 4.1.4 Disciplinary or performance management purposes.
 - 4.1.5 Performance review.
 - 4.1.6 Recording of communication with employees and their representatives.
 - 4.1.7 Compliance with legislation.
 - 4.1.8 Provision of references to financial institutions, to facilitate entry onto educational courses and / or to assist future potential employers.
 - 4.1.9 Staffing levels and career planning.
- 4.2 *The drama workhouse* considers that the following personal data falls within the categories set out above:
 - 4.2.1 Personal details including name, address, age, status, and qualifications.
 - 4.2.2 References and CVs.

- 4.2.3 Emergency contact details.
- 4.2.4 Notes on discussions between management and the employee.
- 4.2.5 Appraisals and documents relating to grievance, discipline, promotion, demotion, or termination of employment.
- 4.2.6 Training records.
- 4.2.7 Salary, benefits, and bank / building society details.
- 4.2.8 Absence and sickness information.
- 4.3 Personal data relating to members may be collected primarily for the purposes of:
 - 4.3.1 Communication.
 - 4.3.2 Compliance with legislation.
 - 4.3.3 Provision of references to financial institutions and funding bodies, to facilitate entry onto educational courses and / or to assist future potential statutory or educational institutions.
 - 4.3.4 Membership levels and strategic planning.
- 4.4 *The drama workhouse* considers that the following personal data falls within the categories set out above:
 - 4.4.1 Personal details including name, address, age, status, contact details.
 - 4.4.2 Emergency contact details.
 - 4.4.3 Relevant medical disclosures including allergies.
 - 4.4.4 Notes on discussions between *the drama workhouse* and members.
 - 4.4.5 Records of complaints, personal disclosures referenced within the Protection of Vulnerable Adults Policy and Children Protection Policy, and / or other

records *the drama workhouse* determines of significant interest to the police or social services.

- 4.5 Employees, potential employees, volunteers, and members will be advised by *the drama workhouse* of the personal data that has been obtained or retained, its source, and the purposes for which the personal data may be used or to whom it will be disclosed.
- 4.6 *The drama workhouse* will review the nature of the information being collected and held on an annual basis to ensure there is a sound business reason for requiring the information to be retained.

5.0 Sensitive Personal Data

- 5.1 Sensitive personal data includes information relating to the following matters:
 - 5.1.1 The person's racial or ethnic origin.
 - 5.1.2 His or her political opinions.
 - 5.1.3 His or her religious or similar beliefs.
 - 5.1.4 His or her trade union membership.
 - 5.1.5 His or her physical or mental health or condition.
 - 5.1.6 His or her sex life.
 - 5.1.7 The commission or alleged commission of any offence by the person.
- 5.2 To hold sensitive personal data, *the drama workhouse* must additionally satisfy a sensitive data condition. The most appropriate condition for employment purposes is that the processing is necessary to enable *the drama workhouse* to meet its legal obligations (for example, to ensure health and safety or to avoid unlawful discrimination).

6.0 Responsibility for the Processing of Personal Data

- 6.1 *The drama workhouse* will appoint a Data Controller as the named individual responsible for ensuring all personal data is controlled in compliance with the Data Protection Act 1998.
- 6.2 Employees who have access to personal data must comply with this Policy and adhere to the procedures laid down by the Data Controller. Failure to comply with the Policy and procedures may result in disciplinary action up to and including summary dismissal.

7.0 Use of Personal Data

- 7.1 To ensure compliance with the Data Protection Act 1998 and in the interests of privacy, employee confidence and good employee relations, the disclosure and use of information held by *the drama workhouse* is governed by the following conditions:
 - 7.1.1 Personal data must only be used for one or more of the purposes specified in this policy.
 - 7.1.2 Company documents may only be used in accordance with the statement within each document stating its intended use.
 - 7.1.3 Provided that the identification of individual employees is not disclosed, aggregate or statistical information may be used to respond to any legitimate internal or external requests for data (e.g., surveys, staffing level figures).
 - 7.1.4 Personal data must not be disclosed, either within or outside *the drama workhouse*, to any unauthorised recipient.

8.0 Disclosure of Personal Data

- 8.1 Personal data may only be disclosed outside *the drama workhouse* with the person's written consent, where law requires disclosure, or where there is immediate danger to the person's health.

9.0 Accuracy of Personal Data

- 9.1 *The drama workhouse* will review personal data regularly to ensure that it is accurate, relevant, and up-to-date.
- 9.2 In order to ensure that *the drama workhouse*'s files are accurate and up-to-date, and so that *the drama workhouse* is able to contact the person or, in the case of an emergency, another designated person, staff, volunteers, and members must notify *the drama workhouse* as soon as possible of any change in their personal details (e.g., change of name, address, telephone number, loss of driving licence where relevant, next of kin details, etc.).

10.0 Additional Information

- 10.1 Data Protection Act 1998:
<http://www.legislation.gov.uk/ukpga/1998/29/contents>