

South West Philharmonia & Chorus

GDPR & Data Protection Policy

Policy Version: 1.0

Date Adopted: 17.12.2025

Review Frequency: Annually

Next Review Due: September 2026

Approved by: Senior Leadership Team (SLT)

1. Policy Statement

South West Philharmonia & Chorus (SWPC) is committed to protecting the privacy and personal data of all individuals it works with.

We recognise the importance of handling personal data lawfully, fairly and transparently, and we are committed to complying with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

This policy explains how SWPC collects, uses, stores and protects personal data.

2. Scope of the Policy

This policy applies to personal data relating to:

- Performers and participants
- Children and young people
- Parents and carers

- Staff, freelancers and volunteers
- Members of the Management Team
- Members of the Senior Leadership Team
- Audiences, supporters and donors
- Contractors, partners and suppliers

It applies to all forms of data, including:

- Digital records
- Paper records
- Emails and messaging platforms
- Images, audio and video recordings

3. Definitions

Personal Data

Any information relating to an identifiable individual, such as name, contact details, images or recordings.

Special Category Data

More sensitive data, including health information, access needs, ethnicity, safeguarding information or religious belief.

Processing

Any action performed on personal data, including collection, storage, use, sharing or deletion.

4. Data Protection Principles

SWPC processes personal data in accordance with the following principles:

1. **Lawfulness, fairness and transparency**
 2. **Purpose limitation** – data is collected for specified, legitimate purposes
 3. **Data minimisation** – only data that is necessary is collected
 4. **Accuracy** – data is kept accurate and up to date
 5. **Storage limitation** – data is not kept longer than necessary
 6. **Integrity and confidentiality** – data is kept secure
 7. **Accountability** – SWPC takes responsibility for compliance
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5. Lawful Bases for Processing

SWPC processes personal data under one or more lawful bases, including:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interests
- Vital interests (where applicable)

For **special category data**, SWPC applies additional safeguards and lawful conditions.

6. Consent

Where consent is relied upon:

- It will be clear, informed and freely given
- Individuals may withdraw consent at any time

- Parental consent is required for under-18s
- Consent records will be retained

Consent is never assumed.

7. Types of Data Collected

SWPC may collect and process:

- Names, addresses, email addresses and phone numbers
- Emergency contact details
- Membership and participation information
- Attendance and rehearsal records
- Images, audio and video recordings
- Access, medical or support needs
- Safeguarding and welfare records (where necessary)
- Financial transaction records

SWPC does **not** collect unnecessary or excessive data.

8. Data Storage and Security

SWPC takes appropriate measures to protect personal data, including:

- Secure digital storage systems
- Password-protected devices and accounts
- Limited access to authorised individuals only

- Secure handling of paper records
- Safe disposal of data when no longer required

Data is only accessed on a need-to-know basis.

9. Data Sharing

SWPC will not sell or share personal data for commercial purposes.

Data may be shared only where:

- Required by law
- Necessary for safeguarding
- Necessary to deliver SWPC activity (e.g. venues, insurers)
- Consent has been provided

All third parties are expected to handle data securely and lawfully.

10. Images, Audio and Video

SWPC recognises that images and recordings are personal data.

- Consent will be obtained before use
- Parental consent is required for under-18s
- Images will be used respectfully and appropriately
- Individuals may withdraw consent for future use

Images will not be used in a way that causes harm or distress.

11. Data Retention

SWPC will retain personal data only for as long as necessary.

Retention periods consider:

- Legal and regulatory requirements
- Safeguarding obligations
- Operational need

Data will be securely deleted or destroyed when no longer required.

12. Individual Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent

Requests should be made in writing and will be responded to within **one calendar month**.

13. Data Breaches

A data breach includes loss, unauthorised access or disclosure of personal data.

If a breach occurs, SWPC will:

- Take immediate steps to contain it
- Assess the risk
- Notify the ICO where required
- Inform affected individuals where appropriate
- Record the incident and lessons learned

All suspected breaches must be reported immediately to the Senior Leadership Team.

14. Roles and Responsibilities

Senior Leadership Team (SLT)

- Holds overall accountability for data protection
- Ensures compliance with this policy
- Reviews this policy annually

Management Team

- Ensures data is handled appropriately in day-to-day activity
- Reports concerns or breaches promptly

Staff, Freelancers and Volunteers

- Follow this policy at all times
 - Protect personal data they have access to
 - Report concerns immediately
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15. Complaints

Concerns about data protection or misuse of personal data may be raised under SWPC's **Complaints Policy**.

Individuals also have the right to complain to the **Information Commissioner's Office (ICO)**.

16. Review and Updates

This policy will be:

- Reviewed annually by the Senior Leadership Team
- Updated to reflect changes in legislation or practice
- Communicated to all relevant parties