



# THE STORY CLUB

## STITCH - DATA PROTECTION POLICY

Stitch collects and uses personal information about pupils, parents and other individuals who come into contact with Stitch. This information is gathered in order to enable it to provide information regarding classes and associated functions. In addition, there may be a legal requirement to collect and use information to ensure that Stitch complies with its statutory obligations.

### Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically. All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

### What is Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

### Data Protection Principles

The Data Protection Act 1998 establishes eight enforceable principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for one or more specified and lawful purposes;
3. Personal data shall be adequate, relevant and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998;
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security whether it is held internally or cloud based.



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8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

## Statement

Stitch is committed to maintaining the above principles at all times. Therefore we will:

- Inform individuals when their information is shared, and why and with whom it was shared
- Inform individuals why the information is being collected when it is collected.
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Ensure our staff are aware of and understand our policies and procedures

## Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by Felicity Goodman, or nominated representative.

## Contacts

If you have any enquiries in relation to this policy, please contact Felicity Goodman who will also act as the contact point for any subject access requests.

## Appendix 1

Under the Data Protection Act 1998 any individual has the right to make a request to access the personal information held about them.

## Actioning a subject access request

1. Requests for information must be made in writing; which includes email, and be addressed to Felicity Goodman. If the initial request does not clearly identify the information required, then further enquiries will be made



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2. The identity of the requestor must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship to the child. Evidence of identity can be established by requesting production of:
  - passport
  - driving licence
  - utility bills with the current address
  - Birth / Marriage certificate
  - P45/P60
  - Credit Card or Mortgage statement
3. Any individual has the right of access to information held about them. However with children, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. Felicity Goodman should discuss the request with the child and take their views into account when making a decision. A child with competency to understand can refuse to consent to the request for their records. Where the child is not deemed to be competent an individual with parental responsibility or guardian shall make the decision on behalf of the child.
4. The Data Protection Act 1998 allows exemptions as to the provision of some information; therefore all information will be reviewed prior to disclosure.
5. Any information which may cause serious harm to the physical or mental health or emotional condition of the pupil or another should not be disclosed, nor should information that would reveal that the child is at risk of abuse, or information relating to court proceedings.
6. If there are concerns over the disclosure of information then additional advice should be sought.

## Processing Personal Data

The personal data we collect is used to process your request for services, to provide such services and to keep a record of those who use our services so that we may provide them with relevant information. When submitting data, you agree that we may store this information and may contact you to inform you of other information, products and services that may be of interest. If you do not wish to receive such information, you may contact us at any time. We will not disclose your personal data to any other person or organisation unless we are legally required to do so.

## Social Media and Social Distancing

The absence of, or lack of explicit reference to a specific site does not limit the extent of the application of this policy. Where no policy or guideline exists, employees should use their



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professional judgment and take the most prudent action possible. Consult with your supervisor if you are uncertain.

Personal blogs should have clear disclaimers that the views expressed by the author in the blog is the author's alone and do not represent the views of the company. Be clear and write in first person. Make your writing clear that you are speaking for yourself and not on behalf of the company.

Be respectful to the company, other employees, customers, partners, and competitors.

Your online presence reflects the company. Be aware that your actions captured via images, posts, or comments can reflect that of our company.

Do not reference or site company clients, partners, or customers without their express consent. In all cases, do not publish any information regarding a client during the engagement.

Respect copyright laws, and reference or cite sources appropriately. Plagiarism applies online as well.

## GDPR

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the new GDPR (General Data Protection Regulation), and other related legislations.

Stitch is committed to protecting your personal information and being transparent about what information we hold about you. Using personal information allows us to develop a better understanding of our patrons and in turn to provide you with relevant and timely information about the work that we do – both on and off stage.

The purpose of this policy is to give you a clear explanation about how we collect and use the information we collect from you directly

We collect various types of information and in a number of ways:

- Information you give us when completing our enrolment form such as your name, email address, postal address and telephone number.
- Information about your interactions with us. For example, When we send you a mailing we store a record of this.
- Sensitive personal data Data Protection law recognises that certain categories of personal information are more sensitive such as health information.

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Date of policy: May 2021