

## Severn Arts Privacy Policy

This Privacy Policy is intended for parents and carers, schools, volunteers, suppliers and Severn Arts employees.

Severn Arts is responsible for the development and delivery of high-quality music education through Worcestershire's Music Education Hub. The organisation is also contracted to deliver Worcestershire's arts service and strategy and as a principle partner in The Arches - Worcester project is delivering the Festivals strand and employer of the Festivals team.

### **Our responsibilities**

Severn Arts, collects, processes and stores information, including some personal details, in order to deliver our services efficiently.

We are responsible for managing the information we hold and we recognise that this information is important to you. We take our responsibilities seriously and use personal information fairly, correctly and safely in line with the legal requirements set out by the General Data Protection Regulations (GDPR). Anyone who receives information from us is also under a legal duty to do the same and, where relevant, has a set of data protection clauses included in their contract.

Where we need to share sensitive or confidential information such as medical details, we will do so only with your consent or where we are legally required to do so. We may share information to prevent risk of harm to an individual.

We keep our Privacy Policy under regular review. This Privacy Policy was last updated on 25 November 2019.

### **Why we need your information**

We will use your personal information for a limited number of purposes and always in line with our responsibilities, where there is a legal basis and your rights under the GDPR.

We will process personal information:

- for the purpose for which you provided the information, e.g. to join our mailing list, to become a volunteer, to become an employee or supplier, to provide music lessons
- to enable us to communicate with you and provide the services you need
- to monitor our performance in providing services to you
- to gather statistical information to allow us to plan future provision of services and to obtain your opinion about our services
- to meet various legal requirements – for example, if you are a parent you will be asked to provide us with medical information relating to your child if they attend any of our activities outside of a school day. We have a legal duty for the health and safety of children attending activities outside of school
- to enable us to perform statutory law enforcement functions and or for the prevention

and or detection of crime, for example compliance with Keeping Children Safe in Education - <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

- to process financial transactions including grants, payments and benefits directly involving us, for example from parents/carers, or where we are acting on behalf of other government bodies such as Arts Council England, Department for Education, Department for Digital, Culture, Media and Sport
- where it is necessary to protect individuals from harm or injury
- to promote the services we provide where you have given your consent for us to do so
- where it is permitted under the GDPR, for example, to comply with legal obligations or for us to seek legal advice or undertake legal proceedings

We may not be able to provide you with a product or service if we do not have enough information and, in some instances, your consent to use that information.

We aim to keep your information accurate and up to date. You can help us to do this at any time by letting us know if any of the information you have given us, such as your address, changes. Visit our contact page for more details <https://www.severnarts.org.uk/contact/>

## Ways in which we collect your information

### Face to face

We may keep a record of your contact with us to assist us in the delivery and improvement of the services that we provide to you and to others. Any such records that include personal information will be kept securely.

### Telephone calls

Ordinarily we will inform you if we record or monitor any telephone calls you make to us. We may do this to increase your security, so that we have a record of a call taking place and/or for training and quality purposes.

### Emails

If you email us we may keep your email as a record that you have made contact. This includes your email address.

### Online - cookies

A cookie is simply a small text file. It isn't a program and doesn't actively do anything on your computer. As with many other websites, we use cookies for several reasons, the main ones being:

- to make your visit to our site smoother. So, for example, it remembers what you add to your itinerary or allows you to share content with friends on social networks. It also remembers your preferences and so allows us to customise our site according to your individual interests
- to monitor and measure what visitors do on our website. This allows us to know what areas of the site are popular, how often visitors come back, where they come from,

whether they are using a PC or a mobile device and so on. Knowing how our site is being used means we can enhance users' experience in future

### **Opting out of accepting cookies**

Because of the way our websites operate, cookies are needed to allow some of its functionality to work and therefore we recommend that you accept them.

However, if you choose to opt out of receiving our cookies, please understand that although you can still use our site, some functions may not work and your experience may not be as smooth or as enjoyable as we aim to deliver for all our users.

### **The websites use the following cookies:**

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website. You can set your browser to block or alert you about these cookies, but some parts of the site may not work.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. All information these cookies collect is aggregated and therefore anonymous.

### **Online - other websites**

On our website you may find links to other external websites which we have provided for your information and convenience. This Privacy Policy applies solely to Severn Arts. We are not responsible for the content of those sites. When you visit other websites, we recommend that you take time to read their own privacy policies.

### **Purpose for processing and legal basis**

Severn Arts processes participant, audience, volunteer, employee and supplier personal data in order to provide its services.

This includes the following examples:

- communicating with audiences in order to promote our Festivals programme and charge for some events
- collecting information for reporting and monitoring purposes e.g. evaluation of events
- taking photographs for publicity and evaluation purposes, if people consent to this

- communicating with volunteers and suppliers to plan their involvement in delivery of the Festivals programme
- paying staff and suppliers

## Lawful basis

We will only process personal data where we have one of 6 'lawful bases' to do so under Article 6 of the EU General Data Protection Regulations.

Most commonly:

- to **fulfil a contract** with the individual
- for the **legitimate interests** of Severn Arts (provided the individual's rights and freedoms are not overridden)
- where the individual (or their parent/carer when appropriate in the case of a child) has freely given **consent** (for example, to receive notification of upcoming events, to have photographs taken)

And exceptionally to:

- **comply with a legal obligation**
- ensure the **vital interests** of the individual e.g. to protect someone's life
- perform a task **in the public interest**

## Information collected

Personal data that we may process about individuals may include, but is not restricted to:

- your full name and title and date of birth and your gender
- next of kin
- postal address, email address and phone number
- IP (internet protocol) address e.g. cookies
- emergency contact details and contact preferences
- ethnicity
- characteristics, such as special educational needs
- details of any medical conditions or dietary requirements
- attendance information
- safeguarding information
- details of any support received
- Gift Aid status
- payment card details (these are not stored)
- photographs and video recording

## What we will do with your information

When deciding what personal information to collect, use and hold, we are committed to making sure that we will:

- only collect, hold and use personal information where it is necessary and fair to do so
- keep your personal information secure and safe
- securely dispose of any personal information when it is no longer needed
- be open with you about how we use your information and who we share it with; and
- adopt and maintain high standards in handling any personal information.

We may disclose personal information to a third party, but only where it is required by law, where that third party needs that information to provide you with a service on our behalf or where it is otherwise allowed under the GDPR. We will strive to make sure that the third party has sufficiently robust systems and procedures in place to protect your personal information.

## How long we will hold your information

We will not keep your information any longer than needed to provide the services you require unless the law states the period that such records should be kept.

We follow [Worcestershire County Council's disposal schedules](#) which contain information about how long to keep different types of information. When we dispose of personal information we will do so in a secure way.

## Who we may share your information with

Your personal information may be shared within Severn Arts or with external partners and agencies involved in delivering services on our behalf. They will only have access to your information if it is needed to provide you with a service or to comply with a legal/financial obligation. This does not mean that we share all the personal data you give us, only what is necessary for very specific purposes.

Severn Arts will seek to ensure that the third party has sufficient systems and procedures in place to prevent the loss or misuse of personal information.

If your personal information is transferred outside the European Economic Area (EEA) for processing or storage purposes Severn Arts will ensure that safeguards are in place to protect it to at least the standard applied within the EEA.

## Your information rights

Under the GDPR you, as the Data Subject, have the following rights. Each request will be reviewed and actioned wherever possible. However, you should be aware that, due to the reasons that Severn Arts may be processing your information, we may not be able to comply with some requests due to a legal obligation.

You have the right to:

- access the information we hold about you
- request that we rectify any information about you that is incorrect. Simple inaccuracies, such as address changes, will be made. However, depending on the purpose for processing, records (including statements and opinions) may not be changed, but there will be the option for you to provide a supplementary statement which will be added to the file
- request that records we hold about you are erased
- restrict processing of the information we hold about you if you have an objection to that processing, whilst your objection is investigated
- request that any information that you have provided to us is given back to you in a format that you can give to another service provider if required
- object to processing of your personal information including automated decision making and profiling
- make a complaint to a supervisory authority if you are not satisfied with how the information held about you has been handled

For any such requests please visit <https://www.severnarts.org.uk/contact/>

### **Use of personal information for marketing**

We will only send you information about our services and/or products if you have opted in to receive them. We may also share your information with other service providers who may contact you with details of services they provide if you give us permission to do this. You can change your mind at any time by letting us know <https://www.severnarts.org.uk/contact/>

### **The prevention and detection of fraud**

Severn Arts is required by law to protect the public funds it administers. Therefore we may use any of the information you provide to us for the prevention and detection of fraud or to comply with the law.

As well as conducting our own 'data matching' exercises we may also share your information with other public bodies. These include (but are not limited to):

- The Audit Commission
- Department for Work and Pensions
- Local Authorities
- Her Majesty's Revenue & Customs (HMRC)
- The Police

We may also share information with credit reference agencies, service providers or contractors and partner organisations, where the sharing of information is necessary, proportionate and lawful.

## How to access the information we hold about you

You have the right to request a copy of the information that we hold about you. If you would like to do so, please contact us by email or by post giving us as much detail as possible about the information you require. See <https://www.severnarts.org.uk/contact/>

We will need to confirm your identity before any information can be provided. You will then receive a copy of the information held about you along with an explanation of any codes used or other clarification that may be necessary.

## Requesting that someone else look at your information on your behalf

You can request that someone else looks at your records on your behalf. To do this you will need to give us consent in writing informing us of who you want to look at the information for you. If a relative or someone else wishes to look at the records of a person who is not able to give their consent, this will only be allowed where it can be shown to be in the best interest of the person concerned.

## How to contact us

To exercise any of your rights under the General Data Protection Regulations (GDPR) please contact us:

- by email – <https://www.severnarts.org.uk/contact/>
- by telephone – 01905 947300
- by post – Severn Arts, Suite 11, Malvern Gate, Bromwich Road, Worcester, WR2 4BN

If you are not happy with the response you receive from us you have the right to make a complaint to a supervisory authority:

## Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone: 0303 123 1113

## Equalities information

We may use information such as your ethnic background, first language, gender, sexual orientation and age to gather statistics about the population of the area and the take up of our services. This is to help comply with our reporting obligations for the use of public money and to plan the provision of services in the future. Such analysis will not identify individuals or have impact on entitlement to services and facilities.