



# Data Protection Policy encompassing GDPR 2018.

Last updated 19/04/22

## **Introduction.**

This policy outlines The Big Reveal's commitment to the new General Data Protection Regulations (GDPR). The GDPR regulations are an EU framework which will come into place in the UK as from the 25<sup>th</sup> May 2018.

## **What Information does GDPR relate to?**

As with the current data protection act (1998) regulations, GDPR relates to "personal data" and "sensitive personal data". For The Big Reveal this includes the names and addresses of members of both the Revelation Strings and The Revellers' Orchestra. The way in which any data we hold is handled remains unchanged under the new guidelines as the current data protection act covers this information already but this document outlines our responsibilities under these new, enhanced GDPR regulations and how we, as an organisation, intend to demonstrate our compliance with them.

## **What personal information does The Big Reveal hold?**

The nature of The Big Reveal's activities means that we need to hold certain contact details and information for our members both in order to maintain contact with those individuals/their parents and to ensure that we have all of the relevant details with which to comply with the Child Performance and Activities Legislation (2014) for which we hold a Body of Persons Approval (BOPA) Licence to enable us to allow under 16's to participate in our events and performances. The information we hold is normally limited to "personal data" such as names, addresses, email and phone contact information. For the purposes of this document child members are those under 16 years old.

## **How do we hold personal data?**

The Big Reveal holds this personal information on a secure electronic database that is overseen by the Director and Treasurer. This data is never passed on to external companies or individuals and where information is shared between the Trustees for the purposes of organising events and activities, only the data necessary to undertake that process is made available. Normally this would be a simple email contact list which will always be used in blind copy when contacting members to ensure that privacy is upheld when mailing to the wider membership.

## **Sensitive Personal Data.**

We never ask for, receive or store anything that would be classed as "sensitive personal information" from our membership unless absolutely relevant in order to ensure the safety and

full participation of that individual. The Big Reveal will seek access to criminal record information (through a formal DBS check) for those adults who are responsible for safeguarding (a full list of people who hold DBS checks is included in our safeguarding policy)

The Big Reveal may also on occasions be party to information that would be classed as "sensitive" relating to child members. This information may, for example, be communicated verbally by a parent to the director or safeguarding officer or on the consent form. This may be where a child has a specific safeguarding or medical need, allergy or disability that may require additional support or care in order to enable them to participate fully in the activities and performances. Under those circumstances the nominated safeguarding officer would be informed if relevant or necessary and any written record would be held in the strictest confidence and where included on the consent form, only for the six months required by the BOPA licencing regulations.

Other examples of information that would come into this category would include employment history and sexual or religious orientation, none of which we will ever ask for.

## **Children's Personal Data:**

The GDPR contains new provisions intended to enhance the protection of children's personal data. Where events, activities or performances are open directly to our under 16 members, The Big Reveal will ensure that a privacy notice is written in a clear, plain way that a child will understand. The GDPR states that "if consent is your basis for processing a child's personal data, a child under the age of 16 can't give that consent themselves and instead consent is required from a person holding 'parental responsibility'. To this end, all of our under 16 members must submit participation form **prior** to the first rehearsal session. This form must have been signed by either a parent or nominated guardian to confirm that they are happy for The Big Reveal to hold and use the data on that form for the purposes of delivering that activity, event or performance.

### **What "services" does The Big Reveal offer to children?**

The Big Reveal provides opportunities for children to experience high quality arts, music, dance and drama activities. It enables them to actively participate in performances and access outreach experiences led by highly experienced professional musicians and educators.

### **How does The Big Reveal handle children's personal data?**

The Big Reveal's activity participation forms are specifically designed to ensure that we only hold as much information as is needed to fulfil our legal requirements under safeguarding and BOPA legislation. The guardian is also required to actively give permission for The Big Reveal to include a child's name in any performance programme or on our website for the purposes of recognising that child's contribution to an activity. The responsible guardian is also required to tick to opt in to giving permission for photographs to be taken of their child for the purposes of creating a record of the event. Where a guardian has not actively opted in then it is automatically assumed that permission is not given for the child to be named or for their photograph to be taken. BOPA regulations specify that we must keep a record of any child who has participated in an event run under the BOPA licence for a minimum period of six months after that event. After this date the forms will be securely destroyed.

### **What does The Big Reveal do with the data it collects from its members?**

The Big Reveal will only hold the data in the ways described previously in this document. We will never supply any personal information relating to an individual without their express permission. We do not, under any circumstances, supply or sell any personal information to any

outside organisation. Where we hold data relating to individuals we will only use it to ensure that we are complying with our legal obligations as a charitable organisation and for the purposes of recognising the contributions those members have made to our activities and performances.