CENTREPIECES
Mental Health Arts Project
Registered Charity 1160300

The King's Award for Voluntary Service
The MBE for volunteer groups

Data Protection Policy

Date of policy: January 2025
To be reviewed: January 2028

1. Introduction

Centrepieces needs to collect personal information of its artists, trustees and volunteers. This policy describes how this personal information must be collected, handled stored to meet the charity's data protection obligation and to comply with the regulation.

2. Why this policy exists

This policy exists to ensure that Centrepieces

- Complies with the General Data Protection Regulation
- Protects the rights of trustees, artists and volunteers
- Is open about how it stores and processes individuals' data
- Protects itself from the risk of data breach

3. General data protection regulation

The General Data Protection Regulation 2016 describes how organisations including Centrepieces must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically or on paper.

To comply with the regulation, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The regulation is underpinned by six important principles which states that personal data must be:

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specific, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Retained only for as long as necessary
6. Processed in an appropriate manner to maintain security

4. People, risks and responsibilities

Policy scope

This policy applies to all data that Centrepieces holds relating to identifiable individuals. This includes names, postal addresses, email addresses, telephone numbers, emergency contacts, date of birth, gender, ethnicity and any other information required by the Charity Commission.

Data protection risks
This policy helps to protect Centrepieces from data security risks including breaches of confidentiality.

Responsibilities
Trustees, co-ordinators and nominated administration volunteers of Centrepieces have a responsibility to ensure that personal data is handled and processed in line with this policy and data protection principles. Key areas of responsibilities are:

- The trustees are responsible for reviewing all data protection procedures and related polices, in line with an agreed schedule.
- The coordinator is responsible for keeping the trustees updated about data protection responsibilities, risks, and issues
- The nominated administration volunteers are responsible for
    - Handling data protection queries from anyone connected with Centrepieces
    - Dealing with requests from individuals to see the data Centrepieces holds about them (also called 'subject access request')
    - Maintaining membership records and keeping data secure

General guidelines

- Data should not be shared informally. Access to personal data held by Centrepieces is limited to those who need it for the administration of the charity and membership
- Training will be provided to everyone with access to personal data to help them understand their responsibilities when handling data
- Strong passwords and appropriate security codes must be used, kept secure and should never be disclosed
- Data will be regularly reviewed and updated. If it is no longer required, it will be deleted and disposed off in a secure manner.

Data storage

- Where data is stored on paper
    - It will be kept in a secure place accessible to authorised persons only
    - When the data is not in use, the paper or files will be kept in a locked filing cabinet
    - Effort will made to ensure that personal data is not accessible to unau thorised people
    - Printed paper will be shredded and disposed of securely when no longer required
- Where data is stored electronically
    - It will be protected by strong passwords, which are changed every 6 months or sooner if key volunteers leave Centrepieces or for other security reasons
    - When working with personal data, screens of computers will always be locked when unattended
    - Personal and confidential demographic data will be shared only through formal and secure channels of communication
    - Data will never be transferred outside Centrepieces
    - Data will only be stored on designated hard drives and backed up automatically
    - Data will never be saved on unauthorised devices such as tablets or smart phones

- All servers and computer data will be protected by approved security software and a firewall

Data accuracy
The regulation requires Centrepieces to take reasonable steps to ensure that data is kept accurate and up to date as possible.

- Data will be stored only in appropriate folders, only generated with purpose.
- Centrepieces will conduct regular data audits to ensure they're updated. These include data audits that monitor artist forms, renewal of annual subscription and related aspects.
- Individuals part of the organization will have access to their own personal data and this will be in an accessible format.
- Data will be audited regularly, should inaccuracies arise, they would be resolved with immediacy.

Data subject access request
All individuals who are the subject of personal data held by Centrepieces are entitled to:

- Ask what information Centrepieces holds about them
- Ask how to gain access to it
- Be informed how to keep it up to date

The request from individuals should be made to the Project Co-ordinator, Assistant Co-ordinator or administration volunteers by email at info@centrepieces.org
Centrepieces can also supply a standard request form if needed. Centrepieces will always verify the identity of anyone making a subject access request before handing over any information and will aim to provide the relevant information within one month of the receipt of the request.

Disclosing data for other reasons
In certain circumstances, the General Data Protection Regulation allows personal data to be disclosed as required by law.

Data Breach
Centrepieces will report any breach of security leading to the accidental or unlawful loss of personal data to the relevant supervisory authority, Information Commissioner's Office (ICO). This will be no later than 72 hours after the breach was discovered. Where it is not feasible to report within the timeframe, a justification for the delay will be provided to the ICO. However, it is not necessary to notify the supervisory authority where the breach is unlikely to result in a risk to the rights and freedoms of individuals.

Providing information
Centrepieces aims to ensure that individuals are aware that their data is being recorded and processed and that they understand:

- How the data is being used
- How to exercise their rights

To this end, Centrepieces has a Privacy Notice, setting out how data relating to individuals is used. This is available on request or on the Centrepieces' website.