

ALQUD

DATA MANAGEMENT POLICY

Reviewed June 2023

For review June 2024

Statement of Purpose

The Aloud Charity needs to gather and use certain information about individuals. These can include members of choirs, funders, suppliers, business contacts, employees, freelance staff, volunteers and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards and to comply with the law.

This data management policy ensures that Aloud:

- Complies with data protection law and follows good practice
- Protects the rights of members, supporters, staff and other partners and stakeholders
- Is transparent about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law:

The UK General Data Protection Regulation (GDPR) applies in the UK and sits alongside the Data Protection Act 2018. It requires that personal data be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; (further processing for archiving purposes in the public interest, scientific or historical research or statistical purposes shall not be considered to be incompatible with the initial purposes);
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of individuals;
6. Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

Responsible persons

Everyone at Aloud contributes to compliance with UK GDPR. Responsibilities include (but are not necessarily limited to):

Keeping senior management and board updated about data protection issues, risks and responsibilities	CEO
Documenting, maintaining and developing the organisation's data protection policy and related procedures, in line with agreed schedule	CEO
Embedding ongoing privacy measures into corporate policies and day-to-day activities throughout the organisation. The policies themselves will stand as proof of compliance.	CEO; Development Manager; Project Managers
Dissemination of policy across the organisation, and arranging training and advice for staff	CEO
Dealing with subject access requests, deletion requests and queries from clients, stakeholders and data subjects about data protection related matters	Project Support Officer
Checking and approving contracts or agreements with third parties that may handle the company's sensitive data	Development Manager
Ensuring all systems, services and equipment used for storing data meet acceptable security standards	CEO
Performing regular checks and scans to ensure security hardware and software is functioning properly	CEO
Evaluating any third-party services the company is considering using to store or process data, to ensure their compliance with obligations under the regulations	CEO
Developing privacy notices to reflect the lawful basis for fair processing, ensuring that intended uses are clearly articulated, and that data subjects understand how they can give or withdraw consent, or else otherwise exercise their rights in relation to the company's use of their data	CEO; Development Manager; Project Managers
Ensuring that audience development, marketing, fundraising and all other initiatives involving processing personal information and/or contacting individuals abide by the UK GDPR principles	Development Manager

Data Protection Officer (DPO):

Aloud is not obliged under GDPR to appoint a DPO but has determined that the Chief Executive Officer should fulfil the role of DPO, and lead on ensuring that data protection obligations are met.

The minimum tasks of the DPO are:

- To inform and advise the organisation and its employees about their obligations to comply with the GDPR and other data protection laws
- To monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal audits
- To be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc)

Data Users:

Subject to any data access restrictions determined by the Chief Executive, permission to access data will be granted to:

- All staff for legitimate charity purposes
- Other individuals, where agreed for a specified time period, following the prevailing UK laws and regulations

Data users are required to:

- Access and use data only in their conduct of The Aloud Charity business
- Access only the data they need to carry out their work at The Aloud Charity
- Respect the confidentiality and privacy of individuals whose records they may access
- Observe any ethical, commercial, security or other restrictions determined by The Aloud Charity
- Comply with all relevant legal requirements
- Work within the limits of the data access that they have been granted
- Not provide their login passwords to any other individual
- Only disclose data about an individual with the consent of the individual concerned (or the consent of the parent / guardian where this is required) unless it has safeguarding implications
- Be objective in their use of data

Scope of personal information to be processed:

See the attached spreadsheet (which forms part of this policy) for details of the following:

- What data is kept
- What it is used for
- How it is collected
- Where it is kept
- How long it is kept for
- What the lawful basis for processing is

We are aware of the sensitive nature of the data we process relating to children and young people. Our processes support us to make sure we do this in an open and transparent way that supports our safeguarding policy. We have designed systems that ensure that they are protected at all times requesting consent as appropriate from their parent / guardian to hold and process their data but acknowledge that they have the same rights as adults over their personal data. Our privacy notices for this are clear so that those we work with understand their rights in this respect.

Data Sharing and Automated Processing:

The Aloud Charity does not share data with any other organisation or party. Nor does The Aloud Charity undertake automated processing.

Security Measures:

The Aloud Charity stores all personal data on a fully GDPR compliant CRM Systems (Class Manager and eTapestry, a service provided by Blackbaud). Secure log-ons to the system are provided to members of staff who need to access data for the fulfilment of their employment contracts with the charity. Examples are:

- Administrator and Project Managers for contacting project participants and parents
- Development Manager for contacting donors, and other supporters
- Finance and Operations Manager for contacting staff and freelance contractors

Hard copies of membership forms for Only Boys Aloud Academi are kept in a locked filing cabinet within the Aloud office, which is locked outside of office hours, or when there is no-one present. These are securely destroyed in line with our Data Management systems and will be kept online only in future years.

Lists of data created for specific events (such as Chaperone lists or invite lists) are kept in cloud-based storage, GDPR compliant, and accessible only via password. Laptops, mobile phones and PCs are also password protected, with passwords regularly changed. All equipment is protected with security software and firewalls. We have Cyber Essentials Accreditation, which provides assurance of security measures in place.

Any hard copies of lists produced for events are kept in folders and destroyed securely after use. This also applies to hard copies of membership forms once obsolete.

Data Breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. Certain breaches require reporting to the ICO (Information Commissioner's Office) within 72 hours. A more detailed description of what comprises a data breach is available and is shared with all relevant individuals as part of data protection training. A form for reporting and acting on data breaches is available to all staff, which describes the actions to be taken.

The Rights of Individuals who are the subject of data:***Subject Access Requests:***

All individuals who are the subject of data held by the Aloud Charity are entitled to:

- Ask what information the company holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations

The right to have data rectified:

The GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. An individual can make a request for rectification verbally or in writing and The Aloud Charity will respond to this request within one calendar month. (In certain circumstances The Aloud Charity can refuse a request for rectification. This right is closely linked to the controller's obligations under the accuracy principle of the GDPR (Article (5)(1)(d)).)

The right to be forgotten:

When requested by a subject The Aloud Charity will – in certain circumstances - remove from its database all information and data held about that subject.

This will be done by deleting the relevant records on Class Manager and / or eTapestry, securely disposing of any paper correspondence or records, and the removal of any other contact information held on computers, phones or other electronic devices. This process will be undertaken by the Project Support Officer, overseen by the Chief Executive.

The right to for personal data to be removed is identified on privacy statements.

The right to object: Individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics

Privacy Statements:

The Aloud Charity aims to ensure that individuals are aware that their data is being processed, and that they understand:

- Who is processing their data
- What data is involved
- The lawful grounds for processing that data
- The outcomes of data processing
- How long their data is being held
- What their rights are and how to exercise them.

To these ends the Aloud Charity has a number of privacy statements, setting out how data relating to various groups of individuals is used by the company. These statements are shared at first point of contact with the individual. There is also a more generic Privacy Statement available on the website.

Ongoing documentation of measures to ensure compliance

Meeting the obligations of the UK GDPR to ensure compliance will be an ongoing process. We are registered with the Fundraising regulator and the ICO and will maintain these to ensure good practice in these areas. We will also keep records of privacy measures implemented, and records of compliance.

Appendix 1 – Privacy Policy

The Aloud Charity Respects Your Privacy and is committed to protecting it.

This page sets out details of The Aloud Charity's privacy notice. It lets you know how we will use the information we collect about you. It also shows that we comply with the General Data Protection Regulation (GDPR) 2018, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR). This policy may change from time to time.

1. Who we are

The Aloud Charity is a Wales based charity that transforms lives through the power of song.

Registered address: Ty Derw, Lime Tree Court, Cardiff Gate Business Park, Cardiff CF23 8AB

We are registered as a Charity in England and Wales, registration number: 1147922, and a company registered in England and Wales, number 8116295

2. Why do we need this policy?

Almost every organisation needs to collect some personal data to carry out their activities.

The Aloud Charity is responsible for the data you supply to us. In data protection law, this is called being the data controller. This means that we decided how to collect and use your personal data and are responsible for ensuring that your data is accurate is kept safely, and is used lawfully, fairly and in a transparent way. Any data you supply to us will only be processed for the purposes of our work as a charity. This will be mostly to let you know about our activities, make sure you have the best possible, relevant relationship with us and, if you're one of our participants, to make sure you're safe while you're with us.

We've tried to make this policy as easy to understand as possible so that you can be sure that your data is collected, used and stored appropriately.

This policy tells you why we need to collect your data, how we store and use your data and your legal rights to amend or remove your data from our records.

3. What type of data we collect

We collect personal data about you when you sign up to our activities or newsletters, when you make a donation to us, when you buy something from us, when you become a staff member or volunteer, or when you contact us. This is usually done through our online portals, our website or through written correspondence with us either via email or post.

The types of data we collect from you will be different depending on why you get in touch with us. This data might include:

- Personal data such as your name and title, date of birth, postal address, email address, phone number
- Information about how you like to be contacted such as preferred language, preferred pronoun
- Equality monitoring data such as age, disability, race, religion or belief, sexual orientation, gender
- Information about health conditions, access requirements and emergency contact details
- Photographs
- Stories or quotes about the impact of our work

In addition to the above, we collect data about any contact you have with us as a ticket buyer, donor or supporter of The Aloud Charity. This data might include:

- Ticket purchases and event attendance
- Payment details and financial transaction history with us
- Membership and donor status
- Contact preferences
- Gift Aid status
- Details of correspondence sent to you, or received from you

Please note that if you book or purchase anything with us online your data is processed by a third party, which has its own privacy policy. You should refer to these for further details. If you have bought tickets for a performance from one of our partner venues and have concerns about the data you provided during this transaction, you may need to contact the venue directly about this. Each venue will have their own privacy policy on their website, which should tell you how you can get in touch with them about this. If you have problems with this, please contact us and we'll try to help to point you in the right direction.

When we ask you to provide your personal information, we will let you know why we are asking, and how we will use your data, by directing you towards this policy.

4. How we use your data

When you give us your data, we may use it for one or more of the following purposes:

To keep you informed

Depending on your relationship with The Aloud Charity, and the preferences you have indicated, data we hold may be used to send you promotional, marketing, membership or fundraising information by post, telephone or electronic means. These types of communications might include:

- Providing you with the information you need to be able to take part in our activities such as rehearsal times, bus pick up times, rehearsal location, event times and location

- Informing you of other products, services or events related to The Aloud Charity, such as upcoming performances, events or ticket offers
- News and updates about The Aloud Charity
- Information on our fundraising campaigns, including occasional targeted requests to consider supporting us in various ways.

You are able to remove your consent to us using your data in this way. You can do this at any time by contacting hello@thealoudcharity.com. Please remember that you will no longer be able to participate in our activities if you opt-out of receiving information about them. You can of course opt-out from receiving wider marketing communications or from having your photograph taken, and this will not affect your relationship with us as a participant.

To keep you safe

If you are a participant, staff member or volunteer, we will hold sensitive personal data to be able to ensure your safety and well-being while working with us. This information is only distributed on a need-to-know basis to members of the team, and will only be used to make sure you're safe in our activities. This might include making sure additional access needs are met, that there is someone we can contact in the event of an emergency, that your dietary requirements are met, that we do not compromise your health in our activities, that you are able to access medication as required.

To fulfil our contractual obligations to you

If you are purchasing goods or tickets from The Aloud Charity or are a paid member of the team, we will need to process information about you to allow us to fulfil the terms of our contract with you. This might include sending goods to your address, taking payment for services, or making payments to your account.

To fulfil our contractual obligations to funders or sponsors

We collect data on the impact of our work. This might involve equality monitoring information about participants, staff, and volunteers as well as quotes and case studies about the effects of our work. Some of this data is collected to make sure we comply with funder requirements and is shared with those who support us. Some data, quotes and case studies may also be used on our website, in general correspondence with supporters, and to support future funding applications. All data is anonymised, unless specific requests are made to subjects that can be identified for this data to be shared. Completing an equality monitoring form or sharing quotes and case studies with us is optional and not doing so will not affect your relationship with us.

To fulfil our legal and / or legitimate interests

Some of the data we collect is to support us to fulfil our wider responsibilities and support us to carry out necessary checks in the course of our work. We will only distribute this data to a third party if there is a compelling legal reason to do so. These instances might include safeguarding incidents or fraudulent transactions.

Sharing data

We do not give out, sell or trade our mailing list data with third parties.

We do not share your personal data with external companies other than those selected to process our customers' details for the purposes of ticket or donation transactions. We have put in place contractual arrangements with these organisations to ensure that your data is secure and always protected. Requests for information to be corrected or removed from these systems should be made directly to hello@thealoudcharity.com.

5. How we store your data

We store your electronic data using secure, password-protected databases. Some of your data will be kept on cloud-based systems. We choose systems with strong security features and up-to-date encryption to help prevent unauthorised access. We know that the transmission of information via the internet is not completely secure, and we will do our best to protect your personal data. We have Cyber Essential Accreditation in place to support this.

We store any paper-based data in a secure, locked cupboard in an alarm protected office.

Data is only printed out where necessary, such as to enable us to carry out our activities in places where there is no easy access to WiFi. When this happens, it is stored securely by an assigned team member and destroyed securely when it is no longer needed.

Most data will be securely destroyed by us when it is no longer needed. This is usually between 6 and 36 months after your last engagement with us. The exception to this is our alumni archive which may contain your name, photo / audio / visual recordings of your time with us and case studies of the effect of our work on you. This is to support a record of our work and impact across the years.

6. Third party links

You might find links to third parties on our website. These websites have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies as we have no control over them. In cases when we use external websites provided

by other organisations such as Twitter, YouTube or Facebook, then we would ask you to consult their privacy policies.

7. Your data protection rights

Under data protection law, you have legal rights, in certain circumstances to:

- Access your data
- Change or complete your data
- Erase your data
- Restrict the processing of your data
- Object to the processing of your data
- Transfer the information you gave us to another organisation

You are not required to pay any charge for exercising these rights.

If you make a request, we will respond to you within 4 weeks.

8. How to contact us if you want to ask any questions about this policy or your rights

Address: Data Protection Officer, The Aloud Charity, Unit 1, Regent's Court, Nettlefold Road, Cardiff, CF24 5JQ

Email: hello@thealoudcharity.com

Phone: 029 20 481715

Website: aloud.cymru

9. How to make a complaint

You have the right to complain to the Information Commissioner's Office (ICO) if you are unhappy with the way we have used your data. You can do this by calling them on 0303 123 113 or via their website [Data protection complaints | ICO](#)