# BAFA_logo_A_LBritish Arts Festivals AssociationDATA PROTECTION POLICY

***Policy Review Date: June 2022 [This policy must be reviewed at least once every 12 months]***

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# BREACHES OF SECURITY

**If a breach of security occurs the ICO (Information Commissioner’s Office), must be informed within 72 hours. Any mediating action recommended by the ICO must be enforced as a matter of priority, to avoid prosecution.**

**It is imperative that all staff and trustees notify the Director and/or Chair immediately if they suspect personal data has been compromised.**

**In the event of a security breach BAFA will endeavour to contact all affected individuals and provide further information as necessary.**

# PROCESS FOR THE COLLECTION AND STORING OF CUSTOMER DATA AT BRITISH ARTS FESTIVALS ASSOCIATION

* Customer data is captured and stored as part of the process of membership applications, booking tickets for events and signing up to our mailing list for the British Arts Festivals Association and their ticketing hosts. We store the data on the British Arts Festivals Association SharePoint drive which includes documents such as membership details, event sign ups and mailing lists.
* At point of sale for our events, the following details will be taken or checked as standard, for every customer:

**First name**

**Surname**

**Organisation**

**Telephone number** *[To enable British Arts Festivals Association to contact in case of query]*

**E-mail address** *[To enable BAFA to send e-mail confirmations of ticket purchases, invoices and event information].*

* This information is captured (as demonstrated above) for communication purposes, allowing BAFA to offer good customer service, and to function successfully as a business.
* On some occasions, BAFA may send out information about events being promoted by one of its partners or associate clients, either as part of one of its own newsletters, or on behalf of the particular organisation. In these instances, information will be sent by BAFA directly and not shared with the third party.
* In some instances, information of a sensitive nature may be captured on the ticketing system, to aid with good customer service (for example, if a customer uses a wheelchair, or is blind and has to bring their guide dog etc). Information of this nature will only be stored with the prior consent of the customer.

**PROCESS FOR THE COLLECTION AND STORING OF PERSONAL DATA RELATING TO EMPLOYEES, AND TRUSTEES OF BRITISH ARTS FESTIVALS ASSOCIATION**

* As part of the recruitment process for management staff, artists and trustees at the British Arts Festivals Association, any or all of the following information will be collected:
* Application forms/CVs
* References
* Contracts of Employment
* Equal Opportunities Monitoring forms
* Emergency contact details & doctor’s information
* There will be three forms of record:
1. Digital records in a confidential folder on server
2. SRG LLP will have a confidential record of payments and contracts of employment
* On entering employment with BAFA all staff will sign a formal contract. Digital copies of the contracts will be kept for the duration of employment, followed by a further period to comply with HMRC regulations (currently 6 years as at January 2018).
* Other items of personal information such as emergency contact details, doctor’s information, application forms/CVs and references will be held by the Director and only deleted in line with above.
* All financial records relating to an individual’s employment with the Association will be held by the Director for a period to comply with HMRC regulations (currently 6 years as at January 2018).
* When an employee leaves BAFA their email files will be converted to a shared inbox, accessible by members of staff as is necessary for the continuation of business. Employees should avoid using BAFA accounts for personal correspondence, and it is the employee’s responsibility to remove any personal, non-business content before departure.

# PROCESS FOR COLLECTION AND STORING SUPPLIER DATA AT BRITISH ARTS FESTIVALS ASSOCIATION

* At the first point of a supplier invoice BAFA record this data on their confidential database
* Name
* Company Name
* Address
* Telephone number
* E-mail address
* The receiving of an invoice from a supplier will be taken as confirmation that they are happy for their information stored by BAFA
* A supplier record will be de-activated on request.

**MEASURES FOR SECURITY OF DATA**

Digital **Records**

* The IT systems which BAFA use to store personal data are cloud-based, which means that confidential information is not stored on a server hosted by the organisation. In addition, payroll records are kept by the Association accountants who process the payroll.
* All computer records of confidentia**l** information are stored in these places:
1. Microsoft Office 365
2. SharePoint File system
3. Dropbox
4. Google Drive
5. Ticketing systems BAFA uses such as TicketSource, Eventbrite and Future ticketing
* These companies fully protect their servers against theft of confidential information.
* All laptops used by the British Arts Festivals Association staff run antivirus software, which regularly scans for and eliminates any viruses, malware etc.
* No files containing confidential information will be stored on the hard drive of any laptop. Files may be saved to the hard drive for a short time whilst a specific task is being performed but must be deleted entirely, immediately after the task is finished.
* Any passing on of files containing confidential information must be done by secure means.
* Confidential information will not be shared with people living outside the EEA except in very special circumstances. If these circumstances arise, every effort will be made to ensure the security of the data in transit as well as when it reaches its destination. In these instances, an audit trail of the decision-making process and risk assessment of the transfer will be kept.
* Before disposing of any computer equipment, the hard drive will be completely formatted ensuring that no retrievable data remains.

# ASSOCIATION ACCESS TO PERSONAL DATA

* Access to all personal information will be restricted and granted only to the Director and Administrator of BAFA. Systems with restricted access will include:
1. Microsoft Office 365
2. Sharepoint
3. Google Drive
4. Ticketing systems BAFA uses such as TicketSource, Eventbrite and Future ticketing
* Trustees will be granted to access certain information as and when required through specific files, such as lists of membership and lists of those who have purchased tickets for our events.

# REQUESTS FOR A PRIVACY NOTICE

* Any customer/employee of British Arts Festivals Association can request to see the information that the company holds about them, at any time.
* All requests must be responded to within 14 days of receipt.
* For no cost, the following information will be provided:
* Date the information was gathered.
* Purpose for which the information was gathered and why it has been kept.
* How long it will be kept for going forward.
* All information on file regarding that customer/employee, including any sensitive data.
* A copy of our Data Privacy Notice template is attached as appendix A

Policy produced by Alice Thompson
**Administrator**British Arts Festivals Association

**APPENDIX A**

**TEMPLATE FOR PRIVACY NOTICE**

**Privacy Notice**

This document constitutes a full and accurate record of all the information held by British Arts Festivals Association about the below named individual. Details are only kept for those people who are active customers or suppliers of the British Arts Festivals Association.

**Full name:**

**Date information collected:**

**Audit trail of significant changes made to the data since this point**

**Personal Details**

**Address:**

**Telephone Number:
Mobile Number:**

**E-mail Address:**

**Contact Preferences:**

**Any further notes:**