



Bright Sparks Theatre Arts Company

A Community Interest Company (C.I.C.)

Established 2013

Bright Sparks Theatre Arts CIC

GDPR and Data Protection Policy

1. Purpose

Bright Sparks Theatre Arts CIC is committed to protecting personal data and complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We recognise the importance of safeguarding personal information and maintaining trust with participants, families, volunteers, staff, funders and partner organisations.

2. Scope

This policy applies to all personal data processed by Bright Sparks Theatre Arts CIC and to all directors, employees, volunteers and contractors acting on behalf of the organisation.

3. Data Protection Principles

We will ensure personal data is:

- Processed lawfully, fairly and transparently.
- Collected for specified and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
- Stored securely and protected against unauthorised access, loss or misuse.
- Processed in accordance with individuals' rights.

4. Personal Data We May Collect

We may collect:

- Names and contact details.
- Emergency contact information.
- Attendance records.
- Support and accessibility requirements.
- Photographs and video recordings (with consent).
- Volunteer and staff information.
- Monitoring and evaluation data required by funders.

Where necessary, we may process limited special category data, such as disability-related information, to ensure participants can safely access our activities.

5. Lawful Basis for Processing

We process personal data under one or more of the following lawful bases:

- Consent.
- Legitimate interests.
- Contractual obligations.
- Legal obligations.
- Vital interests where necessary to protect someone's wellbeing or safety.

6. Consent

Where consent is required, it will be:

- Freely given.
- Specific and informed.
- Recorded appropriately.
- Withdrawable at any time.

Consent will be sought separately for photographs, videos, marketing materials and publicity where appropriate.

7. Data Security

Bright Sparks Theatre Arts CIC will take appropriate measures to protect personal information, including:

- Password-protected electronic systems.
- Secure cloud storage where applicable.
- Restricted access to personal data.
- Secure disposal of records when no longer required.
- Training and guidance for those handling personal data.

8. Data Sharing

We will not sell personal information.

Information may be shared with:

- Local authorities.
- Funding bodies (in anonymised or aggregated form wherever possible).
- Support providers.
- Safeguarding agencies.

- Emergency services.

Information will only be shared where there is a lawful basis for doing so.

9. Data Retention

Personal information will only be retained for as long as necessary to fulfil the purpose for which it was collected or to meet legal, safeguarding, insurance or funding requirements.

Records that are no longer required will be securely deleted or destroyed.

10. Individual Rights

Individuals have the right to:

- Access their personal information.
- Request correction of inaccurate information.
- Request deletion of information where appropriate.
- Restrict or object to certain processing activities.
- Withdraw consent where processing is based on consent.
- Complain to the Information Commissioner's Office (ICO).

11. Data Breaches

Any suspected data breach must be reported immediately to a Director.

The organisation will investigate breaches promptly and, where required, report them to the Information Commissioner's Office in accordance with UK GDPR requirements.

12. Responsibility

The Directors of Bright Sparks Theatre Arts CIC are responsible for ensuring compliance with this policy and promoting good data protection practices throughout the organisation.

13. Monitoring and Review

This policy will be reviewed annually or sooner if legislation or organisational needs change.