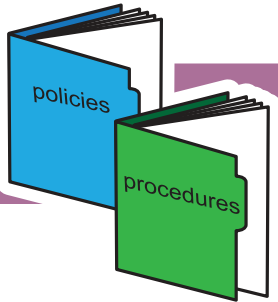


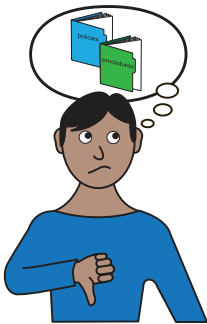


policies and procedures

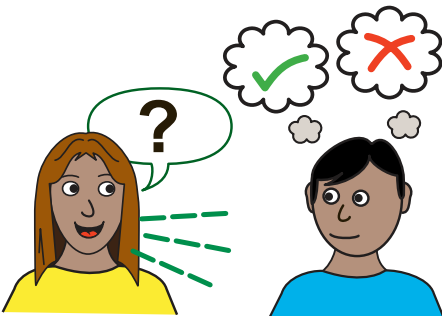


Our 'policies and procedures' are the rules about how we do things at Pyramid.

Following our policies and procedures helps to keep everybody safe.

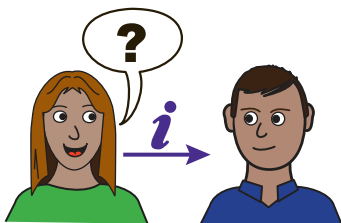


The policies and procedures also tell us what to do if something goes wrong.

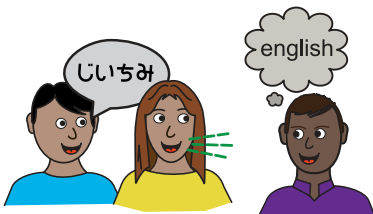


It is important that everybody at Pyramid can access and understand our policies and procedures.

The office team can help with this.



Please contact us if you would like support to read or understand this policy.



We can meet with you to talk about it. Or we can provide information in different format / language to suit your needs.



phone: **0113 234 6040**  
text: **07531 215 999**  
email: **[governance@pyramid.org.uk](mailto:governance@pyramid.org.uk)**

## Privacy Statement

This document explains how we manage our Data Protection responsibilities.

Key terms / words	Please use the <b>glossary of policy terms</b> for definitions of key terms used in our policies and procedures.				
Clarifications	The term 'worker' is used in this policy to refer to anyone doing work for Pyramid, in any capacity, whether paid or voluntary.				
Who does this policy / procedure apply to?	Everyone.				
Related policies and procedures	Data Protection Policy Photographs and Video Recordings of People Policy				
Who is responsible for this document?	The Operations Manager is responsible for making sure that this document is kept up-to-date with accurate information, and that it is made available to anyone who wants to read it.  The Board of Trustees have a legal responsibility to ensure that Pyramid has appropriate policies and procedures in place.				
When was this document last checked?	The Trustees review all Pyramid policies and procedures on a rolling basis, and more often as required (for example, if there is a change in the law, or an incident review).  This document was last checked by the Trustees on 11 September 2023.				
Who to contact	If you have a question about this policy, or need support to understand it, please contact the Operations Manager.  <table border="0"> <tr> <td><b>Email</b></td> <td><b>Phone</b></td> </tr> <tr> <td>governance@pyramid.org.uk</td> <td>0113 234 6040</td> </tr> </table>	<b>Email</b>	<b>Phone</b>	governance@pyramid.org.uk	0113 234 6040
<b>Email</b>	<b>Phone</b>				
governance@pyramid.org.uk	0113 234 6040				

Pyramid of Arts is a **Data Controller**. This means that we store personal information (**data**) about people, and we have a legal responsibility to make sure that

- data is secure
- we only keep data that we need in order to do our work safely and effectively

### **This document explains:**

- What data we hold about people
- Why we have that data
- How we protect that data
- What to do if you want access to the data we have about you
- What to do if you want us to change or delete your data

### **Who is affected?**

We hold data about people who have contact with Pyramid in different ways. These are:

- Members
- Volunteers
- Young people (members or volunteers aged under 18)
- Freelance artists
- Staff
- Trustees
- Donors
- Audiences
- Staff within partner organisations, other service providers and funders

### **Who is responsible?**

Our Board of Trustees have ultimate responsibility for ensuring that Pyramid operates within the law and meets its legal obligations.

The Operations Manager has general day-to-day responsibility for data protection and is the designated Data Protection Officer.

### **Our reasons for holding data**

Pyramid must have a good reason to hold personal data about you. This is called the '**lawful basis for data processing**'.

Mostly, Pyramid holds personal data using the lawful basis of '**legitimate business interests**'. This means that we

need to hold the data in order to do our work. For example, we need to have your name and address in order to send you information about your group / activity at Pyramid.

Sometimes, we use the lawful basis of '**consent**'. This means that we have asked your permission to hold the data, and you have said yes. For example, we ask for permission before adding anyone to our e-newsletter mailing list.

Occasionally, we use the lawful basis of '**legal obligation**'. For example, as a Registered Charity we are obliged to keep financial records for at least six years, which might include data about who we have paid or received money from.

## **Data retention**

The law says that data must not be kept for longer than necessary.

We will keep data for a specific length of time when there is a legal requirement to do so (e.g. financial records, employee files).

Our policy for individual personal data not covered by a specific law is to keep it for five years from the individual's date of leaving. We will hold data for five years for the purposes of

- maintaining records in case of legal action
- providing references
- collating information for project evaluations and reports to funders

We will review the data we hold annually, and securely destroy any records that have passed the retention period.

## **What information do we hold?**

The table on the next page shows what data we hold, where and why.

There is more information about the different ways we store data below.

What?	Application form	Care needs form	Database	MicroSoft 365	Google	Zoom.us	Core worker file	Why?
Name	Y	Y	Y	Y	Y	Y	Y	To identify you
DOB	Y		Y	Y				To identify you
Gender	Y		Y	Y				To identify you
Address	Y		Y	Y			Y	To contact you
Phone number	Y		Y	Y			Y	To contact you
Email address	Y		Y	Y	Y	Y		To contact you
Emergency Contact (name and number)	Y		Y	Y			Y	In case you are ill / have an accident
Personal info re activities / interests	Y		Y	Y				To understand your interests and how we fit into the picture
Communication means and needs	Y	Y	Y	Y			Y	So we can ensure we can communicate with you and understand you in sessions
Access needs	Y	Y	Y	Y			Y	So we can ensure our sessions are accessible to you
Photo permissions	Y		Y	Y				To make sure we only use photos of you with your permission
Training and experience	Y		Y	Y				To decide if you are a suitable volunteer / worker and identify future training needs
References	Y		Y	Y	Y			To decide if you are a suitable volunteer /worker
DBS certificate number and date of issue	Y		Y	Y				To prove we have run the check and so we know when to run another check (every two years)
Legal membership status	Y		Y	Y				So we can identify our legal members in order to provide legal notices (e.g. of an AGM)
Personal care summary (e.g. medical or emotional needs)		Y		Y			Y	So we can ensure our workers know what to do and how to support you
Session notes (observations about what you did in a session)			Y	Y	Y			To monitor progress, identify issues, make adjustments to better support you, identify training needs
Photos and video recordings	Y		Y	Y	Y	Y		To identify you / to use in marketing and monitoring reports / as part of projects (e.g. when making a film)
IP address					Y	Y		For website analytics / To identify you
Sexuality			Y					Equal Opportunities Monitoring
Gender			Y					Equal Opportunities Monitoring
Ethnicity			Y					Equal Opportunities Monitoring
Religion			Y					Equal Opportunities Monitoring
Disability (Y/N)			Y					Equal Opportunities Monitoring
Mental health issues (Y/N)			Y					Equal Opportunities Monitoring
Autism / Asperger's (Y/N)			Y					Equal Opportunities Monitoring

## **Where do we hold information and how do we keep it safe?**

**In the office** – Information on paper such as application forms, references and project proposals are kept in locked filing cabinets in our registered office. The cabinets can only be accessed by office staff.

**In the Core Worker File** – Each of our groups has a ‘core worker file’, which is looked after by the Core Worker for that group. For groups meeting at our premises in Holbeck, these files are kept in a locked filing cabinet on site and can be accessed by the Core Workers. For groups who meet elsewhere, the Core Worker keeps the file and takes responsibility for ensuring it is kept safe (see below for more information). Files are returned to the office for safekeeping after each group project.

**With Core Workers** – we use freelance artists to deliver our projects and contract them in the role of ‘Core Worker’ for our groups. Core Workers have received training from Pyramid in privacy rights and data protection. Core Workers hold data about group members and volunteers (such as contact details and pertinent health information) to ensure the safe and smooth running of our sessions. Although Core Workers are freelance workers, the contract they sign means they are bound by Pyramid’s policies and procedures. Core Workers sign a specific ‘Data Sharing Agreement’ with Pyramid which details how they must protect data in their care, and not keep data for longer than necessary for the project.

**With staff** – staff members may sometimes work from home. Where possible they will use Pyramid’s equipment to do so but in some circumstances they may use personal equipment. Staff have the same responsibilities to look after personal data at home as they would at work and will follow all Pyramid security and data protection procedures.

**On our database** – Pyramid owns and maintains an online database. The database is held on a cloud server. The cloud server has a built-in firewall and a security application to protect it. The database domain name has an SSL (secure socket layer) attached to it and a dedicated IP address. The SSL is provided by GeoTrust Inc and has 256bit encryption. A username and password is required to access the database. Only office staff and the database development company who maintain it (Reach Studios) can access the database.

**On Microsoft 365** – Staff Microsoft accounts are password protected. We are satisfied that Microsoft 365 meets the requirements of the General Data Protection Regulations (GDPR) as a data processor (i.e. a service that we as a data controller use to process data).

(More information: <https://www.microsoft.com/en-gb/trust-center/privacy/gdpr-overview>)

**On Google** – Google provides a range of services, including Gmail and Google Analytics. Staff Google accounts are password protected. We are satisfied that Google meets the requirements of the General Data Protection Regulations (GDPR) as a data processor (i.e. a service that we as a data controller use to process data).

(More information: <https://cloud.google.com/security/compliance/gdpr/>)

**On Zoom.us** – We use Zoom conferencing software to deliver online sessional activity. Zoom meetings can be recorded (you will be notified and asked for permission beforehand) and the recording will be stored on Zoom. Zoom routinely collects basic technical information such as your IP address for troubleshooting and admin reporting (e.g. to block someone). Pyramid does not see or use this information. We are satisfied that Zoom meets the requirements of the General Data Protection Regulations (GDPR) as a data controller.

(More information: <https://zoom.us/docs/en-us/privacy-and-security.html>)

**On MailChimp** – MailChimp is a data processor (i.e. a service that we as a data controller use to process data). We use MailChimp to send out our e-newsletter. If you have registered to receive our e-newsletter, MailChimp will store your email address, and your first and last name (if you supplied this optional information). It will also collect and store your IP address and timestamp when you sign up – this is evidence that you have given permission for us to send you newsletters. MailChimp has Privacy Shield Certification and we are satisfied that their processes for transferring personal data meet the requirements of the GDPR.

(More information: <https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation>)

**On UCheck** – if you are required to undergo a Disclosure and Barring Service (DBS) check as part of your contact with Pyramid, your data will be processed and controlled by UCheck. UCheck will require a separate consent from you to process and hold your data. Pyramid is satisfied that UCheck meets the requirements of the GDPR as a data controller.

(More information: <https://hrplatform-cdn.s3.amazonaws.com/docs/Privacy%20Policy%20v2.2.pdf>)

## **How can I access my information?**

Please write to us and ask if you would like to have a copy of the information we hold about you. This is called a 'subject access request'.

- We will respond to your request within 28 days
- You might be asked to provide proof of identity before we give you the information
- You might be charged an administration fee if you have asked for excessive or repetitive information (we will decide the cost and tell you before we proceed)

## **How can I change my information?**

Please write to us and tell us what needs changing. We will update our records as quickly as possible, and always within 28 days.

## **How can I remove my information?**

You can write to us and instruct us to remove any information that you have given us consent to store, by withdrawing your consent.

Some information we have about you might be held under our 'legitimate business interests'. We do not have to remove the information if we still need it to operate. If this happened, we would tell you why we needed to keep the information, and when we would be able to remove it.

## **How long will you keep my data?**

We will review the data we hold annually and securely delete any data that has passed its retention period

Write to:      The Data Protection Officer  
                    Pyramid of Arts  
                    62 Barkston House  
                    Croydon Street  
                    Leeds LS11 9RT  
  
                    governance@pyramid.org.uk