

Data Protection Policy

For the purposes of this document, Salisbury Area Young Musicians (SAYM) includes Friends of Salisbury Area Young Musicians (FSAYM) and FSAYM Ltd except where specifically stated

SAYM will comply with the terms of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018, and any subsequent relevant legislation to ensure personal data is treated in a manner that is fair and lawful.

1 Data Gathering

- Information is gathered by SAYM to enable it to provide education and other associated functions.
- In addition there may be a legal requirement to collect and use information to ensure that SAYM complies with its statutory obligations
- All personal data relating to contractors and volunteers, pupils or other people with whom we have contact, whether held on computer or in paper files are covered by the GDPR
- Only relevant personal data may be collected and the person from whom it is collected should be informed of the data's intended use and any possible disclosures of the information that may be made
- A privacy statement will be made available at the time of initial data gathering (see below)
- Personal data will not be used for direct marketing and fundraising purposes unless data subjects have given their explicit consent

2 Data Storage

- Personal data will be stored in a secure and safe manner.
- Electronic data will be protected by standard password and firewall systems
- Computers operated by SAYM will have encrypted hard drives
- SAYM computer screens will not be used so that they are visible to casual observers
- Manual data will be stored in a locked cabinet or in secure storage
- Particular attention will be paid to the security of sensitive personal data

3 Data Checking

- The SAYM Administrator and Manager will issue a subscription reminder at the beginning of each term to the parents/carers of young musicians

where there will be an opportunity to check the information we have on file to ensure that it is correct and up-to-date

- Any errors discovered will be rectified through this process

4 Data Retention

Information will be deleted/destroyed in a timely manner when it is no longer required to deliver the services. An exception to this will be any requirement by our auditors to temporarily retain records for assurance purposes. Otherwise, after young musicians leave SAYM their personal data will not be retained in identifiable form without explicit consent (which may be requested to keep in touch via newsletters etc, or for marketing in support of SAYM's aims).

Anonymised data may be retained for reporting purposes.

5 Data Disclosures

- Personal data will only be disclosed to organisation or individuals for whom consent has been given to receive the data, or organisations that have a legal right to receive the data without consent being given
- If SAYM receives requests by telephone to disclose personal data, the SAYM Administrator and Manager will ensure the caller is entitled to receive the data and they are who they say they are. This will mean calling back, preferably via a switchboard to minimise the possibility of fraud. Proof of identity may also be requested
- Requests for the personal details from one young musician's family to another will be politely refused
- Personal data will not be used in websites, newsletters or other media without consent from the data subject
- Personal data will only be supplied to statutory authorities if they are able to supply the necessary documentation which notifies of a specific, legitimate need to have it
- A record will be kept by SAYM of any personal data that is disclosed

6 Privacy Statement

The following statement will be placed on the SAYM Registration form and also used when data is being gathered:

The data we collect is used for the running of SAYM. It is held on SAYM computers or those of our contracted service providers and is only used for the purposes of running SAYM. Anonymised information may be shared with the Wiltshire Music Hub, Arts Council and other funding organisations for reporting and statistical purposes as required for funding etc. You have the right to ask for a copy of the information we hold about you, and to ask for any errors to be corrected.

7 Roles and Responsibilities

- **FSAYM Ltd** (the Corporate Trustee) is responsible for ensuring that the SAYM complies with the legislation and its related procedures and action plans are implemented
- **A Director** has a watching brief regarding of the implementation of this policy
- **The SAYM Manager is the Data Controller** and is responsible for implementing the policy

Any queries about this policy should be addressed to SAYM at admin@saym.org.uk

You may complain about SAYM's use of data to the Chair of FSAYM and FSAYM Ltd via manager@saym.org.uk. If you are then not satisfied you may take the matter further with the Information Commissioner at ico.org.uk/concerns.

8 Information and resources

SAYM will ensure that the content of this policy is known to all contractors, volunteers, committee members, parents and the young musicians

This policy will be held on the SAYM Website

9 Monitoring and review of the Policy

This policy will be monitored by FSAYM Ltd and reviewed annually

This policy last reviewed on:

1 November 2023