

## GDPR Policy

**Policy Date:** January 2026

**Review Date:** January 2027

**Approved By:** Rowena Lloyd

### 1. Introduction

Yorkshire CREATE is committed to protecting the personal data and privacy of all individuals who interact with the organisation. This includes visitors, artists, staff, volunteers, partners, donors, and workshop participants.

This policy explains how Yorkshire CREATE collects, processes, stores, and protects personal data in compliance with:

- UK GDPR
- Data Protection Act 2018
- Guidance from the Information Commissioner's Office.

Yorkshire CREATE recognises that responsible data management is essential for maintaining trust and operating ethically.

### 2. Scope

This policy applies to:

- Employees
- Freelance artists and facilitators
- Volunteers
- Trustees and board members
- Participants in workshops or programmes
- Visitors to the arts centre
- Individuals interacting with Yorkshire CREATE online

The policy covers all personal data processed by the organisation, whether stored digitally or in physical form.

### 3. Key Definitions

#### Personal Data

Any information that identifies or could identify a living individual (e.g., name, email, phone number).

#### Processing

Any action taken with personal data including collection, storage, use, sharing, or deletion.

## **Data Subject**

The individual whose personal data is being processed.

## **Special Category Data**

Sensitive personal data such as health information, ethnicity, or disability information.

## **4. Principles of Data Protection**

Yorkshire CREATE follows the principles set out in UK GDPR:

1. **Lawfulness, fairness and transparency**  
Personal data will be processed lawfully and transparently.
2. **Purpose limitation**  
Data will only be collected for specified and legitimate purposes.
3. **Data minimisation**  
Only necessary information will be collected.
4. **Accuracy**  
Data will be kept accurate and up to date.
5. **Storage limitation**  
Personal data will only be kept as long as necessary.
6. **Integrity and confidentiality**  
Appropriate security measures will protect personal data.
7. **Accountability**  
Yorkshire CREATE will demonstrate compliance with these principles.

## **5. Data We May Collect**

Yorkshire CREATE may collect personal data including:

### **Basic Information**

- Name
- Phone number
- Email address
- Postal address

### **Participation Information**

- Workshop registrations
- Event bookings
- Programme applications

### **Employment & Volunteer Information**

- CVs
- Contact details
- Safeguarding information (where required)

### **Website Data**

- Newsletter sign-ups
- Website analytics data
- Event registrations

### **Special Category Data (only when necessary)**

- Accessibility or disability requirements
- Emergency contact details

This information is collected only when necessary for delivering arts programmes and services.

## **6. Lawful Basis for Processing**

Yorkshire CREATE processes personal data under the following lawful bases:

### **Consent**

For mailing lists, newsletters, and marketing.

### **Contract**

For workshop bookings, artist agreements, and employment contracts.

### **Legal Obligation**

Where required by law (e.g., safeguarding or financial reporting).

### **Legitimate Interests**

For running the organisation effectively, managing events, and maintaining relationships with artists and participants.

## **7. How We Use Personal Data**

Personal data may be used to:

- Register participants for workshops or events
- Communicate with artists and collaborators
- Send newsletters or updates (with consent)
- Manage staff and volunteer records
- Administer funding applications and reporting
- Improve services and programming
- Maintain safeguarding and safety records

Yorkshire CREATE will not sell or trade personal data.

## **8. Data Storage and Security**

Yorkshire CREATE implements appropriate security measures including:

- Secure password-protected systems
- Restricted staff access to sensitive data
- Encrypted cloud storage where possible

- Locked storage for paper records
- Regular data reviews and deletion processes

All staff and volunteers handling personal data receive appropriate data protection guidance.

## **9. Data Retention**

Personal data will only be kept as long as necessary.

Typical retention periods may include:

- Event registration data: up to 2 years
- Volunteer records: up to 6 years
- Financial records: 7 years (legal requirement)
- Mailing list data: until consent is withdrawn

When no longer needed, data will be securely deleted or destroyed.

## **10. Data Sharing**

Yorkshire CREATE may share data with trusted third parties only where necessary, such as:

- Event ticketing platforms
- Email newsletter providers
- Accountants or auditors
- Funding bodies where reporting is required

All third parties must comply with UK data protection regulations.

## **11. Individual Rights**

Under UK GDPR, individuals have the right to:

- Access their personal data
- Correct inaccurate information
- Request deletion of their data
- Restrict or object to processing
- Withdraw consent for marketing
- Request data portability

Requests can be made by contacting Yorkshire CREATE directly.

## **12. Data Breaches**

In the event of a personal data breach, Yorkshire CREATE will:

1. Assess the risk to individuals
2. Take immediate action to contain the breach
3. Report serious breaches to the Information Commissioner's Office within 72 hours where required
4. Inform affected individuals if necessary

All breaches will be documented.

### **13. Responsibility for Data Protection**

Overall responsibility for data protection lies with the Yorkshire CREATE Directors.

A Data Protection Lead will oversee compliance and handle data-related queries.

Contact:

**Email:** admin@yorkshire-create.co.uk

**Address:** Yorkshire CREATE The Old Forge, Bowling Green Yard, Kirkgate, Knaresborough, HG5 8FL.

### **14. Review of This Policy**

This policy will be reviewed:

- Once a year, or
- After a safeguarding concern, or
- If safeguarding guidance changes

### **15. Policy Approval**

This policy has been approved by the management of Yorkshire CREATE and is effective from the date below.

**Signed:** RLloyd

**Name:** Rowena Lloyd

**Position with Yorkshire CREATE:** Director

**Adopted on:** January 2026

**Review date:** January 2027