



Data Protection Policy

Fall into Place Theatre

Last updated	July 2023
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Definitions

GDPR	means the General Data Protection Regulation.
Responsible Persons	means Sarah Shaw
Register of Systems	means a register of all systems or contexts in which personal data is processed by Fall into Place.
Fall into Place	Means Fall into Place Theatre, charity incorporated organisation

1. Data protection principles

Fall into Place is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including

protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”



2. General provisions

- a. This policy applies to all personal data processed by Fall into Place.
- b. The Trustees are ultimately responsible for data protection and this policy, and the day to day management and responsibility is undertaken by the Director, Sarah Shaw. The Responsible Person (Sarah Shaw) shall take responsibility for Fall into Place's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Fall into Place shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to Fall into Place shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Fall into Place must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Fall into Place shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Fall into Place's systems.
- e. **Safeguarding:** it may be considered that exclusions apply to elements of this policy for the purposes of safeguarding individuals. It is essential that all such assessments be properly recorded and revisited regularly. Fall into Place Theatre accepts responsibility for proving that the legitimacy of such exclusions have been carefully considered and that, notwithstanding this assessment, the 6 key principles of the GDPR will be maintained as much as possible.
- f. Carers will be given permission to give consent on behalf of others whenever they are legally allowed or obliged to do so. However, Fall into Place Theatre also acknowledges the privacy of those individuals unable to give consent and will, as much as is practicable, seek to identify and respect their wishes. In all other ways, their data will be treated as per the guidelines of this policy.



5. Data minimisation

- a. Fall into Place shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Fall into Place shall hold data for a period of up to 3 years, then review whether the data needs to be held in the future or can be removed.

6. Accuracy

- a. Fall into Place shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date, such as annual contact and confirmation.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Fall into Place shall review their personal data collection annually to ensure it is still necessary to hold.
- b. Data that is no longer necessary to keep shall be removed safely (ie permanently deleted or shredded if paper form).

8. Security

- a. Fall into Place shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to staff who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Fall into Place shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).