

Multitude of Voyces

Data Protection Statement and Policy

This policy should read in tandem with the CIC's I.T. Statement and Security Policy, Data-Sharing Policy, Data Retention Statement and Policy, Media and Social Media Policy, Financial Procedures, Safeguarding Policy and (where relevant) the Project Partners' role description and Agreement.

Overview:

In order to operate, Multitude of Voyces needs to gather, store and use certain forms of information about individuals and organisations. Data is used for permitted lawful purposes and all personnel who handle the data are required to use that data in a manner which is clear, honest and fair.

Everyone who has access to data as part of the CIC's work has a responsibility to ensure that they adhere to this policy.

Policy:

Multitude of Voyces retains the minimum necessary data in order to carry out its work and to safeguard its Stakeholders' assets. Project Partners will be required to agree to a Data-Sharing Agreement within their contract.

(Additional permissions may also be sought regarding use of visual media which includes children or vulnerable adults).

Information may be processed and stored in different ways depending on the individual's relationship to the CIC. Director/s, Associates, Subcontractors (including Volunteers) and Project Partners will have access to different data depending on their role which will be made clear within their Associates' agreement or other contract of work (including voluntary contracts).

Louise Stewart is the Data Controller: her work (and that of other nominated Subcontractors as appropriate) is overseen by the CIC's Data Protection Advisor, Hope and May Ltd www.hope-may.com.

The Director/s are responsible for the management of data on within the CIC.

All Subcontractors (including Volunteers and Project Partners) who may be granted privileged access to personal or sensitive data for use outside the CIC's storage systems, (eg for the purposes of freelance work,) are individually responsible for the secure, fair and transparent collection and use of the CIC's data as befits their particular role and may also be required to provide evidence to the Director of the safe and proper use of that data in line with the CIC's own data storage and management systems.

Subcontractors using an employer's data storage system for carrying out their work for the CIC must obtain written permission (addressed to the CIC) from their employer to do so, and their employer must confirm to the CIC that such data will be shared with the Director/s if requested.

Where information needs to be stored by Subcontractors or by the CIC this is done for the purposes of Legitimate Interest, and, in the case of Stakeholders' data, through Contractual Obligation.

Multitude of Voyces retains data relating to individuals who may be within one or more of the following groups:

Director/s

Associates

Stakeholders (beneficiaries)

Project Partners (individuals and organisations)

Subcontractors who are not Associates

Volunteers (who may or may not be Associates)

Customers (purchasers of fundraising products or workshop attendees)

Occasional supporters (eg. fire officers or ticket sellers at events)

Donors and Sponsors

Data may include:

Director: Louise Stewart B.A. (Hons), P.G.C.E., L.T.C.L., P.G.Cert., ARSCM

louisestewart@multitudeofvoyces.co.uk

General enquiries: admin@multitudeofvoyces.co.uk

01722 332621. Registered address: 7 New Street, Salisbury, SP1 2PH

Updated by Louise Stewart 28.06.2022

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Community Interest Company Number 11915610

Registered with the Charities Aid Foundation – beneficiary number 91000768708

- Contact information, such as landline, mobile phone numbers, personal or work email addresses and postal addresses
- Emergency contact information
- Bank details
- DBS checks and/or criminal records information
- Medical information
- Protected characteristics
- Demographic information (anonymised)
- GiftAid information (this will be kept for six years in line with guidance)
- Photographs (see Safeguarding Policy regarding Project Partners)
- Creative content – written, artistic, musical, visual (including video)
- Copyright information

Data considered essential for the organisation to be retained in line with the CIC's Data Retention Policy.

The CIC keeps personal data secure in the following ways:

- Electronically-held data is held within a password-protected and secure environment. Only authorised personnel are given access to this data.
- Passwords or access to electronic data are reviewed regularly and re-set each time an individual with data access leaves their role (or is removed from it).
- The IT advisor carries out regular checks and updates to ensure the safety of electronic data systems.
- Physically-held data is stored securely in line with the Data Retention Policy and Data Retention Table.
- Access to physical and electronic data is only given to relevant Associates or other Subcontractors (including Volunteers) where that specific data is clearly necessary for carrying out of their role.
- The Director and IT Advisor keep/s a master list of who has access to which data.
- Additional information will be added to policy relating to data control outside of the UK in line with changes due to Brexit.

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- All personnel with access to the CIC's sensitive data are recruited in line with the CIC's Safe Recruitment Policy.

Multitude of Voyces upholds the rights of individuals to complain if they feel their data has been mis-used and their rights to request the correction of any incorrect data.

Use of data-collection systems:

Multitude of Voyces' websites: www.multitudeofvoyces.co.uk and www.multitudeofvoyces.org do not collect cookies.

Multitude of Voyces does not use Data Processing software (eg. MailChimp) and does not send 'blanket' marketing emails.

Group emails are sent where there is a legitimate reason for making contact with those individuals, using blank carbon copy as appropriate.

Multitude of Voyces takes care not to abuse individuals' privacy (see IT Policy, and Media and Social Media Policy).

Historical data (ie, that not currently in use relating to any of Multitude of Voyces' ongoing projects) is checked annually and where necessary consent will be sought where the keeping of that individual's data would exceed the reasonable timeframes outlined in the Data Retention Table. In exceptional circumstances data may be kept for historical research purposes in line with the CIC's objects and projects.

Additional information regarding Associates, Subcontractors (including Volunteers)

Where appropriate within their role, those handling Creative content will be required to adhere to the Code of Practice of the *Chartered Institute of Editing and Proofreading*.

If a Subcontractor uses their own hardware/software/storage systems for the carrying out of their work they may be required to demonstrate that their processing of data provided by the CIC is performed in accordance with the GDPR.

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If a data breach occurs while a Subcontractor (whether paid or unpaid) is carrying out freelance work for the organisation, (see Grievance Policy and procedures) it is their responsibility to notify the Director immediately. The Director will notify the individual/s and the ico as appropriate.

If a subcontractor should knowingly mis-use the CIC's data the Director will uphold the right to inform the ico of a breach on behalf of the CIC.

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