Data Protection Policy

Owner: Director | Adopted by CIC: 11 October 2026 | Review: October 2027 | Version: 1.0

CH11MP Creative CIC — Connecting Communities through Creativity
Connecting Communities through Creativity

1. Purpose

CH11MP will handle personal information lawfully, fairly, transparently and securely. This policy applies to information about participants, families, staff, volunteers, artists, partners, supporters, suppliers and contacts.

2. Accountability

CH11MP Creative CIC is responsible for deciding how and why personal data is used in its operations. The Director is accountable for day-to-day compliance and for obtaining specialist advice where needed.

3. Data protection principles

- Lawfulness, fairness and transparency.
- Purpose limitation.
- Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality.
- Accountability.

4. Lawful use

A lawful basis will be identified before processing personal data. Special category data and criminal-offence data will only be processed where an additional legal condition applies. Consent will be specific and freely given where relied upon, and may be withdrawn.

5. Privacy and individual rights

People will receive clear privacy information. Requests relating to access, rectification, erasure, restriction, objection, portability or automated decisions will be recognised promptly and handled within applicable timescales.

6. Photographs and creative work

Photography and identifiable stories require a clear purpose and appropriate permission or other lawful basis. Refusal will not disadvantage participation. Consent records and restrictions must be respected in publications and partner communications.

7. Security

- Use access controls, strong passwords and supported systems.
- Share personal data only with authorised recipients and suitable safeguards.
- Keep paper records secure and avoid unnecessary copies.
- Use secure disposal and deletion.
- Assess processors and put appropriate contracts in place.

8. Retention

Personal data will be kept only for as long as needed for its purpose, legal duties, safeguarding, finance, insurance or legitimate operational requirements. Retention decisions will be documented and reviewed.

9. Breaches

Suspected loss, disclosure, alteration or unauthorised access must be reported immediately to the Director. CH11MP will contain and assess the breach, document decisions, notify the ICO within 72 hours where required and inform affected people where there is a high risk.

10. Data protection by design

Privacy risks will be considered when designing programmes, forms, systems and partnerships. A data protection impact assessment will be completed where processing is likely to create high risk.

References

UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025; Privacy and Electronic Communications Regulations; ICO guidance.

Approval

Approved by: Craig King, Director
Signature: _____ Date: _____
Next review due: October 2027