



## GDPR & Data Protection Policy

### 1. Purpose of this Policy

Tin Shed Theatre Community Interest Company (12991068) and The Place, Newport (hereafter known as TSTC, TP and/or “we”, “our”, “us”) are committed to protecting the personal data of everyone we work with. This policy sets out how we collect, use, store, and share personal information in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We work with young people and communities on creative projects. In doing so, we collect certain personal information to ensure safety, inclusivity, and to evaluate the impact of our work.

### 2. What Information We Collect

We may collect the following types of personal data:

- **Contact and safety information:** emergency contact details, access requirements, medical needs (where provided).
- **Demographic information:** first half of postcode, age range, how participants heard about us.
- **Project participation data:** attendance, feedback, evaluation forms.
- **Media:** photographs and video recordings of participants (with consent).

We only collect what we need for the purposes listed below.

### 3. Why We Collect Data (Lawful Basis for Processing) We

use personal data for:

- **Safety and safeguarding:** to ensure we can respond appropriately in emergencies.
- **Accessibility:** to understand and meet participants' needs.
- **Monitoring and evaluation:** to understand who we are reaching, improve our work, and report to funders.
- **Marketing and communications:** using photos or videos to promote our work online, in print, and in funding applications.

We will always seek explicit consent before using identifiable photos/videos for marketing.

### 4. How We Store and Protect Data

- Personal data is stored securely on password-protected systems or locked files.
- Only staff who need the data have access to it.
- We do not share personal data with third parties unless required by law or for reporting purposes, in

which case data will be anonymised (e.g. “20% of participants came from NP20 postcode area”). **5. Data Retention**

We keep personal data only for as long as necessary:



- **Emergency contact and access needs data:** deleted within 12 months of the project ending.
- **Evaluation and monitoring data:** anonymised and kept for up to 5 years for reporting purposes.
- **Photographs and videos:** kept indefinitely for archival and marketing purposes, unless consent is withdrawn.
- **General correspondence and administrative data:** kept for up to 3 years.

## 6. Your Rights

Under data protection law, individuals have the right to:

- Access the personal data we hold about them.
- Request corrections to inaccurate data.
- Request deletion of data (where applicable).
- Withdraw consent at any time (e.g. for use of photos/videos).
- Object to how we process data.

To exercise these rights, please contact us (details below).

## 7. Employee Information

When a person leaves a company, they do not have an automatic right to retain or access names and emails of contacts that were developed as part of their job using company resources. This information is generally considered the property of the employer, and taking it without permission can have serious legal consequences, including criminal prosecution and fines.

### Company Ownership and Policy

**Company Property:** Any data, including emails, client lists, and contact information, created or stored on company provided equipment (laptops, phones, servers) belongs to the company.

**Access Termination:** Upon an employee's departure, especially if the separation is not amicable, the company will typically immediately revoke all access to IT systems, including email accounts and shared files.

**Confidentiality Agreements:** Most employment contracts contain confidentiality clauses or non-disclosure agreements that explicitly prohibit employees from using or disclosing private business information during or after their employment.

**Company Policy:** This policy forms part of your contract with Tin Shed Theatre Co. On exit of the company a handover process will begin and will require all work email addresses, passwords, company data & information to be returned on the last day of employment.

### Legal Implications

**Data Protection Laws:** Under laws like the UK GDPR and the Data Protection Act 2018, taking personal data (which client contact details are) without the employer's consent is an unlawful and unauthorised processing of that data.

**Criminal Offences:** Unlawfully obtaining or disclosing personal data can be a criminal offence, potentially leading to fines or other penalties.



**Lawsuits:** Former employees can face civil lawsuits from their previous employer for damages resulting from the misuse of confidential information or client lists. The new employer could also face liability if involved.

### **Employee's Personal Data Rights**

A former employee does have the right to request a copy of their own personal data under regulations like the GDPR (known as a Data Subject Access Request or DSAR). However:

This only applies to information that is specifically about the former employee themselves (e.g., salary details, performance reviews).

They are not entitled to the personal data of other individuals (like clients or other contacts) without that third party's consent, and such information would have to be redacted.

### **8. CCTV Processing & Frontage Management**

The Place operates CCTV covering its externally licensed pavement frontage for the purposes of:

- protection of staff, visitors and property
- deterrence and prevention of nuisance and anti-social behaviour
- safety and site management
- cooperation with law enforcement in relation to incidents occurring in the immediate vicinity

The lawful basis for processing is **Legitimate Interests (Article 6(1)(f) UK GDPR)**.

CCTV footage is retained for **7 days** before being automatically overwritten unless preserved for legal or police purposes. Footage may be shared with Gwent Police on request for crime prevention, investigation or public safety reasons.

The system includes a visual and audible deterrent feature to discourage smoking within the licensed frontage. This does not constitute automated decision-making or profiling under Article 22 UK GDPR.

The area is clearly marked with CCTV and No Smoking/No Vaping signage.

Individuals have the right to make a Subject Access Request concerning footage in which they appear, subject to redaction to protect third-party data.

### **9. Updates to this Policy**

We may update this policy from time to time. The latest version will always be available on our website or by request

### **10. Contact Details**

If you have any questions or concerns about this policy, please contact:

**Tin Shed Theatre Co**

✉ [connect@tinshedtheatrecompany.com](mailto:connect@tinshedtheatrecompany.com)

🌐 <https://www.tinshedtheatrecompany.com>



**NAME:** Georgina Harris (Creative Director and Board Director)

**CONTACT DETAILS:** 07921366038

**DATE:** 13/11/2025

**DIGITAL SIGNATURE:** 

**Signed on behalf of the board of directors by Naomi Cummings**

**NAME:** Naomi Cummings (Board Member for Tin Shed Theatre CIC)

**CONTACT DETAILS:** 07713756713

**DATE:** 13/011/2025 **Digital Signature:**

