



MELT Arts CIC –

Data Protection and GDPR Compliance Policy

(June 2025)

1. Policy Statement

MELT Arts CIC is committed to maintaining the trust and confidence of all participants, audiences, staff, collaborators, and funders. We take privacy seriously and are fully committed to meeting our obligations under:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- ICO codes of practice and government guidance
- This policy sets out how we collect, use, store, retain, and delete personal data, and ensures that everyone whose data we handle understands their rights and our responsibilities.

2. Scope

This policy applies to all personal data processed by MELT Arts CIC, whether collected electronically, on paper, or via other means, and covers:

- All employees, directors, freelancers, volunteers, and contractors
- All project participants, clients, collaborators, and audiences
- All data processed during delivery of services, events, communications, funding, and evaluation

3. Definitions

- **Personal Data:** Information that relates to an identifiable individual (e.g. name, contact details, images)
- **Data Subject:** The individual whose personal data is being processed
- **Processing:** Any operation performed on personal data (collection, storage, sharing, deletion)
- **Data Controller:** MELT Arts CIC – the organisation that determines how and why personal data is processed
- **Data Processor:** Any third party who processes data on our behalf (e.g., cloud services, email platforms)

4. Lawful Basis for Processing

MELT Arts CIC will always identify a lawful basis before collecting and processing personal data. These may include:

- Consent – freely given, specific, informed and unambiguous (e.g. signing up to a newsletter, consent to photography)
- Contractual necessity – processing necessary to carry out a contract (e.g. freelance contracts, event booking)
- Legal obligation – processing required for legal compliance (e.g. safeguarding, HMRC requirements)
- Vital interests – processing to protect someone's life (e.g. medical emergencies during a session)
- Legitimate interests – where necessary for MELT Arts' activities and balanced against individual rights

5. Data We Collect

We collect only the minimum personal data necessary for project delivery, legal compliance, and relationship management. Data may include:

5.1 Participant Data:

- Full name
- Contact details (email, phone, address)
- Emergency contact details
- Demographic data (age, gender, postcode, ethnicity, access needs – where required)
- Consent for photography, video, testimonials

5.2 Staff/Contractor Data:

- CVs, references, DBS details (where applicable)
- Bank details for payment
- Contractual agreements

5.3 Monitoring & Evaluation:

- Anonymised feedback or survey data
- Case studies (with additional consent)
- Attendance logs

6. How We Collect Data

Data is collected through:

- Consent forms and sign-up sheets
- Online forms (e.g. Google Forms, Eventbrite, SurveyMonkey)
- Email, telephone or in-person contact
- Attendance registers
- Contracts and application forms
- We ensure transparency by clearly informing individuals why we are collecting their data, how it will be used, and who it will be shared with at the point of collection.

7. Data Use and Sharing

We use personal data for the following purposes:

- Communicating project details, updates and reminders
- Managing sessions, workshops, and events
- Delivering and evaluating funded projects
- Safeguarding, health & safety, and accessibility
- Financial and HR administration
- Publicity and reporting (with consent for personal content)
- We do not share personal data with third parties unless:
- It is required by law (e.g. HMRC, safeguarding authorities)
- The individual has given explicit consent
- It is necessary for service delivery (e.g. using a secure mailing platform)
- Where third parties are used (such as Mailchimp, Google Drive, Dropbox), MELT Arts ensures they are GDPR-compliant and provide adequate data protection.

8. Communications and Consent

We only contact individuals if they have explicitly given consent via our sign-up or project forms. This includes:

- Newsletters and promotional updates
- Invitations to future projects or events
- Surveys and evaluation follow-up
- All communications include clear opt-out/unsubscribe options, and we regularly audit mailing lists for inactive or expired consent.

9. Data Storage and Security

MELT Arts CIC ensures all personal data is securely stored and protected from unauthorised access or loss.

- Digital data is stored on secure, encrypted platforms (e.g. password-protected cloud storage)
- Physical data (e.g. paper forms) is kept in locked cabinets in secure premises
- Access is strictly limited to staff and contractors with appropriate training and responsibility
- Devices used for processing data (e.g. laptops) are encrypted and protected with strong passwords
- Data is backed up regularly in secure formats

10. Data Retention and Deletion

In accordance with the ICO's principle of data minimisation, we do not retain data longer than necessary. Our retention schedule includes:

- Data Type Retention Period
- Session/participant data Deleted within 6 months of project completion (unless ongoing evaluation is needed)
- Mailing list contact details Until the individual unsubscribes or opts out
- Staff/contractor financial data 7 years (required by HMRC for auditing)
- DBS and safeguarding records Up to 25 years (in line with statutory guidance)
- Evaluation data (anonymised) Retained for project reporting and archiving

All unnecessary or expired data is securely destroyed, either permanently deleted or shredded (for paper records).

11. Subject Access and Data Rights

- Under UK GDPR, individuals have the right to:
- Be informed about how their data is used
- Access the data we hold on them (Subject Access Request)
- Correct inaccurate or incomplete data
- Request erasure of their data (where applicable)
- Restrict or object to processing
- Withdraw consent at any time
- Lodge a complaint with the Information Commissioner's Office (ICO)
- To exercise any of these rights, individuals should contact us in writing.

12. Data Breaches

MELT Arts CIC follows ICO guidelines in the event of a data breach:

- All suspected breaches are logged and investigated immediately
- If the breach presents a risk to individuals' rights or freedoms, we will notify the ICO within 72 hours
- Affected individuals will be contacted where necessary
- We regularly review our processes and provide staff with training to reduce the risk of breaches.
- 13. Staff and Volunteer Responsibilities
- All MELT Arts staff, freelancers, and volunteers are required to:
- Read and comply with this Data Protection Policy
- Complete training on data protection when necessary
- Only access or use data necessary for their role
- Immediately report concerns or suspected breaches

14. Review of Policy

This policy will be reviewed annually or when there are changes to legislation or operational procedures.

- Next review due: June 2026