



# DATA PROTECTION POLICY

## 1. SCOPE

This policy applies to the general public and service users. It also applies to all paid staff, trustees, volunteers, freelance staff, sessional workers, trainees, students or anyone working on behalf of Art Refuge (hereafter referred to as “staff”), or coming into contact with service users (directly or indirectly) for the purpose of Art Refuge business.

## 2. PURPOSE

The purpose of this policy is to outline Art Refuge’s commitment to privacy and data protection.

## 3. OUR COMMITMENT

### Our legal responsibilities

Art Refuge is committed to ensuring privacy through the alignment of our practices with the General Data Protection Regulation (GDPR). The GDPR contains seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

When collecting any personal data from you directly, Art Refuge will ensure that the purpose and lawful basis for data collection is clear.

### Your legal rights

Participants and donors also have the right to request access, restriction, correction, erasure and portability of your personal data, as well as to object to processing of your data. Although we rarely request detailed information from those we work with, we may request further information

from you during the processing of your request in order to ensure security. All legitimate requests to [info@artrefuge.org.uk](mailto:info@artrefuge.org.uk) will receive a response within one month of receipt and will not be charged a fee. A fee may be charged if your request is unfounded, excessive or repetitive. For more details, please refer to the [ICO website](#). You may also withdraw consent for us to use your data at any time.

If you have any concerns about how we collect or use your data, we would appreciate you [contacting us](#) directly in the first instance. If we cannot resolve the issue directly, you have the right to complain to the Information Commissioner's Office.

## **Website**

We are committed to protecting the privacy and the confidentiality of the personal information of visitors to our Website. We collect any personal information (such as your name, email address and organisation) that you supply to us when you contact us, request information from us or make a donation to us. We will update your information where appropriate to keep it current, accurate and complete. Any personal information you supply us through our website will be used for Art Refuge purposes only. It will only be stored for the duration of time necessary to complete the tasks for which the data was intended.

When you visit our website, we use Google Analytics to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. You can find out more about how cookies are used on this website in the Cookies Policy below. If we do want to collect personally identifiable information through our website, we will let you know and ask for your consent.

## **Mailing list**

You may indicate your preference for receiving information via email. Doing so provides us with consent to contact you for Art Refuge purposes. You can also indicate when you no longer wish to receive email communications from us. Art Refuge uses the Mailchimp service to manage our newsletters. By signing up to any of these newsletters, you understand that Mailchimp will be responsible for storing and managing your name and email address. You can unsubscribe at any time by selecting the Unsubscribe link at the bottom of each newsletter. To request manual removal of your details, contact us at [info@artrefuge.org.uk](mailto:info@artrefuge.org.uk).

## **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to tailor their content and operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us to provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie does not give us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline different types of cookies if you prefer. Declining some types of cookies may prevent you from experiencing the full functionality of our website.

## **Images**

We rarely share images of service users on our website and other social media platforms but when we do share images it is only after obtaining consent. We do not share images of participants in our art and art therapy groups if the individuals can be identified. We share photographs of artworks and art activity in progress only after obtaining consent from the artist(s). Service users and staff are welcome to contact [info@artrefuge.org.uk](mailto:info@artrefuge.org.uk) at any time to request the removal of an image from any of our platforms.

## **Social media**

Art Refuge staff moderating our social media platforms (Facebook, Instagram and X - formerly known as Twitter) will not publicly post any original content (written, verbal, visual) containing identifiable personal information. Information and images may be publicly re-posted from a secondary source, and consent for re-posting will be obtained wherever necessary. Content shared publicly and privately on social media platforms are also subject to the Privacy and Data Handling Policies of the respective platforms.

When contacting Art Refuge via social media platforms, these platforms may make your personal information available to us in accordance with their own Privacy Policies (e.g. your account name and profile). Please be aware that if you contact us via methods visible to the general public (e.g. public post/tweet), your enquiry will be visible to individuals outside of Art Refuge. We will wherever possible redirect enquiries concerning individual matters to email communication at [info@artrefuge.org.uk](mailto:info@artrefuge.org.uk).

## **Donations and fundraising**

Online payments for donations and fundraising can be processed through the Third Party Website 'Just Giving'. Personal information supplied through this Third Party Website will be processed in accordance with the Third Party's [Privacy Policy](#). It is possible to make donations completely anonymously or to give more details, such as name, address, email address. You can also choose to hide your personal information from public view during the process of making an online donation.

Other donations accepted online may require personal information to be collected via MailChimp in accordance with their [Privacy Policy](#). Any credit card, bank account and contact information supplied directly to Art Refuge as part of a donation will be used solely for the purpose of

processing the transaction for which it was provided, and only details required for financial records will be stored for this sole purpose.

When you make a donation, consent is requested for Art Refuge to contact you regarding future events, campaigns and appeals. Art Refuge may use consented data to contact people who have previously donated, but this is not a routine course of fundraising for Art Refuge. Donors who wish to have their details removed should contact us at [info@artrefuge.org.uk](mailto:info@artrefuge.org.uk)

Art Refuge may accept offline donations through cash and cheque, and will not request any personal information other than for the purposes of processing a cheque.

### **Service user and staff information**

In the course of Art Refuge activities concerning staff and service users, we will store all personal data on password protected devices, and only stored for the duration of time necessary to complete the tasks for which the data was intended. Only staff who have direct input in service provision will have access to service user information, and such information will only be shared with Third Parties directly involved in service provision after consent has been obtained from the service user. Only staff who have direct input into or oversight of staff management will have access to personal data concerning staff (e.g. for the purposes of recruitment). The degree of access to personal data will be proportionate to the purpose for which the data will be used.

Given the nature of its business and to meet regulatory requirements, Art Refuge requires all staff to undertake a criminal records check as part of its general background checking process. This check provides information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings. It is carried out by the Disclosure and Barring Services (DBS). The applicant will receive a copy of the certificate at their home address. Art Refuge may require a copy of the certificate to be held for no longer than 6 months to allow for consideration and resolution of any disputes or complaints after a recruitment or suitability decision is made. If Art Refuge holds a copy of the DBS certificate, it will be immediately destroyed securely once the retention period has elapsed. While awaiting destruction, disclosure information will be kept in a secure receptacle (e.g. waste bin or confidential waste sack). The Company will not keep any photocopy or other image of the DBS certificate or any copy or representation of the contents of a certificate. However, we may keep a record of the date of issue, the name of the person, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of any recruitment decision taken.

### **Data retention**

Your personal data will only be retained for the period of time necessary to fulfil the purpose for which we collected it. This may include the time that it takes to fulfil any reporting, accounting or legal requirements. If we wish to use your data for other purposes (e.g. research, service statistics), we will anonymise it so that you are not directly or indirectly identifiable. We can use anonymised data indefinitely without your consent or the need to notify you.

Data for the purposes of human resource management will be retained for the period of time required to meet statutory and non-statutory requirements.

### **Data breaches**

In the event of a data breach involving your personal data that poses risk to your rights and freedoms, we will inform the Information Commissioner's Office within 72 hours. You will also be notified without undue delay.

### **Nominated Trustee for data protection**

While Art Refuge's data processing activities do not require the appointment of a Data Protection Officer, the Board of Trustees nominate a Trustee for data protection. Their role is to:

- Provide up-to-date advice and guidance on data protection to the Board and CEO
- Maintain the charity's data protection policy
- Identify, record and manage any data protection risks using the charity's risk register
- Liaise with the ICO where necessary, including during data breach responses and notifications

## **4. MONITORING AND REVIEW**

This policy is fully supported by the Board of Trustees and the CEO of Art Refuge. It will be disseminated to all staff and made available on the Art Refuge website. The policy will be monitored and reviewed annually.