



Escape Arts UK General Data Protection (GDPR) Policy

1. Definitions

For the purpose of this policy, Escape Arts is the **Data Controller**. The **Data Controller** determines the purposes and means of the processing of personal data.

A **Data Processor** is an individual or organisation that processes personal data on behalf of the Data Controller. Escape Arts may engage third-party organisations, such as IT providers and software suppliers, to act as Data Processors, such as M-Technical and Upshot. *For more information, see the Organisational Staffing Policy.*

Lawful Basis is the legal reason an organisation must have for collecting or processing personal data.

The Information Commissioner's Office (ICO) is the independent regulatory body in the United Kingdom responsible for upholding information rights and data privacy.

Data Protection is the process of safeguarding important information from corruption, compromise or loss.

Personal Information or Personal Data refers to information that relates to an identified or identifiable individual, such as a name or contact details.

Two-factor Authentication is a security system that requires two distinct forms of identification in order to access something. At Escape Arts, this refers to a Microsoft account and personal telephone device.

Project Coordinator refers to employees or volunteers of Escape Arts who lead weekly projects and sessions.

Data Retention refers to the continued storage of personal data for a length of time. *The GDPR Policy is to be read in conjunction with the Escape Arts Data Retention Policy.*

Upshot refers to Escape Arts online database which is where all personal information is stored.

For any further support on this policy, please contact info@escapearts.org.uk where your request will be forwarded to the appropriate individual.

2. Statement of Policy

Escape Arts is committed to processing personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and subsequent amendments including the Data (Use and Access) Act 2025. We process personal data under a range of lawful basis, including consent, contract, legal obligation, legitimate interests and vital interests.

In accordance with Article 5, data will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Scope of Policy

This policy applies to all individuals who will encounter personal data in their role with Escape Arts, including but not limited to employees, volunteers, contractors (such as artists) and trustees. This policy applies to all personal data processed by Escape Arts.

The Executive Team (CEO/Deputy CEO) take responsibility for the Charity's ongoing compliance with this policy & implementing this across the staff & volunteer teams.

4. Escape Arts Registration Form, Upshot Database & Use of Personal Data

Escape Arts collects personal data from every individual who joins Escape Arts and completes their Registration Form. Escape Arts only collects information that is relevant and necessary, for example contact details such as email addresses and phone numbers and emergency contact details, so we can contact a family member or friend in the event of an emergency. Individuals are asked to confirm that they have informed emergency contacts that their details will be provided to Escape Arts. The Registration Form is updated annually by the Deputy CEO, Community Programme Manager & Administrator to ensure that all information collected remains necessary and relevant.

All beneficiaries' personal information is stored on Escape Arts online database



Upshot. Participants complete their Registration Form online to Upshot, independently or with a member of staff where it is reviewed by Escape Arts Administrator and accepted onto the system.

Upshot ensures GDPR compliance by:

- Offering different tiers of access for staff members to ensure that personal data can only be accessed by the Project Coordinators who work with each group. Only the Escape Arts CEO, Deputy CEO, Community Programme Manager and Administrator will have access to all personal information on the Upshot system. Each user has their own individual login to ensure that the data is protected.
- Upshot is an online database, enabling Escape Arts to go paperless. This ensures GDPR compliance by ensuring no physical copies of personal data are needed. Any personal data that is on site at an Escape Arts venue must be kept in a locked cupboard.
- Upshot logs the date each participant registers, sending reminders if personal data needs to be reviewed or archived, in line with Escape Arts Data Retention Policy.
- Upshot has a photo storage system with the ability to tag individuals and match them to participant profiles. This tagging feature will also show whether a participant has consented to share their photo for promotional purposes, enabling digital staff to access the photos and know which photos they can share based on who has provided consent. The photo tagging ability also ensures that if we receive a data request from an individual, we can always identify the individual in photos, making it easier for us to confirm the data we have stored for that individual.

Upshot stores all contact details and can be used to download mailing lists for each Escape Arts project. These mailing lists are shared with the Project Coordinator so that they can contact their groups outside of project sessions. Individuals must provide consent on the Registration Form to be added to these mailing lists. Further written consent is required to be added to the Escape Arts monthly newsletter. Individuals are made aware when they are added to a mailing list that they have the right to withdraw their consent to be on the mailing list at any time. An automatic unsubscribe option is added to every Escape Arts newsletter.

Employees must be aware that when they are emailing participant mailing lists, they must ensure that the email addresses are blind copied in (BCC) so that they are not sharing personal data with other individuals. Employees must report this to their manager and Deputy CEO as soon as possible if this occurs.

To ensure that personal data is up to date and that the personal data included on the Registration Form is not stored for more than two years in line with the Data Retention Policy, individuals will be required to review their information and consent to their continued storage every two years. The Registration Form on Upshot itself is updated annually by the Deputy CEO, Administration Manager & Community Programme Manager to ensure only relevant and necessary information is collected.

The Registration Form also records Equalities Monitoring Information, an optional form that records the gender, ethnicity, age, religion, sexual orientation, caring



responsibilities, employment status & health conditions. This information is recorded for reporting to funders/stakeholders and is used anonymously so it cannot be traced back to the individual. This is stated to the person registering on the Registration Form.

Certain information collected by Escape Arts, such as the monitoring information referenced above, constitutes Special Category Data under Article 9 UK GDPR. Escape Arts will only process such information where an appropriate lawful basis and additional condition for processing applies, and appropriate safeguards are in place.

To ensure its processing of data is lawful, fair and transparent, Escape Arts maintains a Register of Systems. The Register of Systems records different groups of people within Escape Arts, such as employees, participants and volunteers and records the personal data that is stored for each group, where the personal data is and why this personal data is stored, referencing the lawful basis for processing this information. The Register of Systems is updated annually by the Deputy CEO.

Security for all Escape Arts devices is managed by M-Technical, an outsourced IT company, who ensure all software is safe, secure and up to date and are on hand to provide GDPR compliance support. M-Technical ensures all Escape Arts organisational systems are protected by multi-factor authentication.

5. Project WhatsApp Groups

Escape Arts uses WhatsApp to keep community groups connected outside of group sessions. All individuals must sign a consent form prior to joining the group that acknowledges their name and contact number will be visible to other members of the group. They must also sign a Code of Conduct confirming appropriate use of the chat, group rules and confirming not to contact anyone individually in the group without their prior consent. The content of every WhatsApp group is monitored every week by the Project Coordinator and/or Project Worker for each community group to ensure the Code of Conduct is adhered to.

6. Escape Arts Devices, Personal Devices & Personal Data

Some employees of Escape Arts will be given laptops and phones for work purposes for the duration of their employment. These devices may contain personal information and must all be password protected.

Security and software for work laptops is maintained by M-Technical, an outsourced IT support company. They also provide professional advice on all IT issues and ensure personal data is safe and secure.

If an Escape Arts device is lost or stolen, the Deputy CEO must be informed immediately. The Deputy CEO will log this on the Data Breach Record. M-Technical must also be informed to provide advice on how to lock the device to ensure the personal data cannot be accessed. If the device is a phone, the network provider must be contacted to cancel the SIM.



This procedure must also be followed if it relates to a personal device that has been lost or stolen and has personal data related to Escape Arts stored on it.

7. Use of Photography & Video

Escape Arts takes photographs and videos featuring individuals participating in services, including but not limited to employees, volunteers, participants, trustees & artists. These photographs and videos are used by Escape Arts for promotional purposes, including on social media, the Escape Arts website and in monthly newsletters. The original copies of all photographs and videos are stored on the Escape Arts Project SharePoint site, which can only be accessed by employees and is protected using two-factor authentication.

Staff are encouraged to take photographs and videos of individuals engaging in Escape Arts projects, sessions and activities. These must be taken on Escape Arts devices (such as work phones or tablets) wherever possible and uploaded to Upshot on a monthly basis. If there are no Escape Arts devices available and a personal device must be used, staff are permitted to do so but must upload the images taken to the Escape Arts Project SharePoint and delete the images off the device as soon as possible following the session.

Volunteers may also be asked to take photographs during projects. If a volunteer takes a photograph or video of project activity, this must be sent to the Project Coordinator of the project and deleted from their device at the end of the session. The Project Coordinator will then upload the images/videos to Upshot.

Escape Arts obtains consent from individuals prior to using their image for promotional purposes. This is obtained through written consent on the Escape Arts Registration Form and verbal consent prior to the image being taken. The Escape Arts Registration Form must be completed by all individuals when joining Escape Arts and also requires individuals to provide written consent to be added to the Escape Arts mailing list. Escape Arts provides privacy information to all individuals explaining how their personal information is collected, used, stored, shared and retained.

The privacy information also includes wording regarding the removal of photographs and images from Escape Arts systems if a request is received from an individual to remove all their personal data stored by Escape Arts. Individuals can withdraw their consent for Escape Arts to use their images for future promotional material but must be aware that whilst every effort will be made to remove the images, it is not always possible on some social media platforms due to their sharing features. An example of this is the monthly Escape Arts newsletters on MailChimp, which cannot be unsent to people's inboxes once it has been published. Escape Arts can guarantee removal from existing promotional posters, the Escape Arts website, the Escape Arts Project SharePoint and Upshot.

Individuals whose image has been used for a promotional film or video will sign a



different written consent form prior to filming for use of their image. Individuals must be aware that consent for their image to be used in a promotional film cannot be withdrawn as depending on the content, it is not always possible to edit the videos and remove their image. This wording is included in the Filming/Video Consent Form, with individuals signing to confirm they understand and give consent.

All Project Coordinators & Project Workers are aware of the participants and volunteers within their groups who have and have not given consent for use of their image for promotional purposes and will share this information with volunteers & artists also supporting the project to ensure there is no breach of personal data rights. To ensure that this is upheld in the event of the Project Coordinator or Project Worker's absence, this information can be downloaded from Upshot and shared with the staff member covering the session.

Escape Arts uses CCTV on its premises at the Escape Arts and Heritage Centre and is registered with the Information Commissioner's Office. The use of CCTV is advertised around the building and is captured as part of our safeguarding policy during community projects and whilst open to the public for exhibitions/events.

Images captured by CCTV are stored on the Pro-Control application for 14 days, after which it is automatically deleted. There are instances where CCTV footage will need to be stored by Escape Arts for longer than 14 days, for example if it is evidence as part of a police investigation. There will also be instances where third parties, such as the police, might need access to this footage. *For more information, see Escape Arts CCTV Policy.*

8. Data Breaches

If an individual suspects that there has been a breach of this policy, this must be reported to an Escape Arts staff member as soon as possible. This must then be escalated to the Deputy CEO, who will investigate all data breaches and keep a Data Breach Record, which will log any and all instances of data breaches and note the steps that are taken to ensure the same breach does not happen again.

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Escape Arts shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office within 72 hours of the breach.

The Deputy CEO will report any data breaches and how they were dealt with to the Board of Trustees on an annual basis.

9. Retention, Amendment and Removal of Personal Data

In accordance with the UK GDPR Regulation, individuals (employees, participants, volunteers and members) have the right to:

- Request access to their personal data
- Request rectification of inaccurate data

- Request erasure of personal data where appropriate.
- Request restriction of data processing.
- Object to data processing.
- Withdraw consent at any time where consent is relied upon.
- Request transfer of their data where applicable.
- Lodge a complaint with the Information Commissioner's Office.

A record of the types of personal data stored by Escape Arts is available as part of the Data Retention Policy. Requests to access personal information must be made to the Escape Arts Deputy CEO, who will provide the information in a timely manner. After receiving the data, if the individual decides that they would like Escape Arts to amend or remove the personal data stored about them, this request must be made to the Deputy CEO, who will amend or remove the personal information within one calendar month of the request being made. The individual must be informed in writing when this has been completed. Individuals are made aware that it is not always possible for photographs and videos that have been used for promotional material on the internet to be fully removed on the Escape Arts Privacy Note.

To ensure that personal data is kept for no longer than necessary, Escape Arts has put in place a Data Retention Policy for each area in which personal data is processed and review this process annually with the Board of Trustees. The Data Retention Policy shall consider what data should/must be retained, for how long, and why. *For more information, see the Escape Arts Data Retention Policy.*

10. Complaints

Individuals who have concerns regarding the processing of their personal data by Escape Arts may make a complaint in writing to the Deputy CEO via the info@escapearts.org.uk mailbox. Escape Arts will acknowledge complaints promptly and investigate them fairly and without undue delay. Where appropriate, Escape Arts will respond to complaints within one month. If an individual remains dissatisfied, they have the right to complain to the Information Commissioner's Office.

11. Implementation

The Executive Team (CEO/Deputy CEO), supported by the Board of Trustees, has specific responsibility for the effective implementation of this policy and we expect all people covered in the scope of this policy to abide by its principles and help to ensure compliance with the UK GDPR Regulation, which is its objective.

In order to implement this policy, Escape Arts shall:

- Employ outsourced IT Company M-Technical to monitor computers/security, ensure all software is up to date/secure and offer advice on security where necessary.
- Re-register with the Information Commissioner's Office and pay the annual fee, which reflects the data we process as an organisation.
- Communicate this policy to employees, volunteers, participants, trustees, artists, contractors and relevant others, including their rights with regards to personal data.

- Provide training and guidance on this policy as appropriate, including basic training as part of the Staff, Volunteer & Trustee Inductions.
- Provide training on the Upshot Database to all current and new staff.
- Obtain written agreements from third-party persons or organisations and partners that they too will comply with the policy in their dealings with the charity. Information Sharing Agreements will be provided for information that will be used for both partner organisations.
- Ensure that adequate resources are made available to fulfil the objectives of the policy.
- Ensure personal data collected and stored is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Ensure that personal data can only be accessed by employees who need access to it.

Violation of this policy is a serious offence and will result in disciplinary action.

12. Monitoring/Review

Escape Arts will monitor the implementation of this policy by ensuring it is a permanent agenda item on monthly Tech Days, led by the Deputy CEO alongside the Administration Manager & Community Programme Manager, with regular discussions feeding into policy development. This policy will be reviewed every two years (unless there are changes to the law) with the Board of Trustees to ensure it is updated to reflect current legislation.

Agreed and adopted by the Board of Trustees – Date: July 2026

To be reviewed every two years, unless there are changes to the law.

Next date for review – Date: July 2028