

Open Sound Community CIC

Community Interest Company registered in England and Wales, company number 17031590

Data Protection and GDPR Policy

Version	1.1
Replaces	Version 1.0, approved 2 March 2026
Approved by the directors	22 October 2026
Next review	22 October 2027
Data Protection Lead	Kazim Adebola Ajao (Ade Ajao)
ICO data protection fee	Exempt. The directors completed the ICO self-assessment and will repeat it if the way we use personal data changes.
Contact	info@opensoundcommunity.org.uk

Purpose

We collect and use personal information about the young people who take part in our programmes, their parents and carers, our team, volunteers and partners. This policy explains how we do that lawfully and safely, in line with UK GDPR and the Data Protection Act 2018.

Who is responsible

Open Sound Community CIC is the data controller for the personal data we process. The directors are jointly responsible for compliance. The Data Protection Lead handles day-to-day questions, requests and breaches.

What we collect

We collect only what we need to run safe programmes, report to funders and improve our work:

- Names, contact details and dates of birth
- Parent or carer details and consent, for participants under 18
- Emergency contacts
- Medical, access or support needs that we need to know about to keep someone safe
- Equality monitoring information (optional, and only with consent)
- Attendance records and evaluation responses
- Information about education, training or employment status, to plan and measure progression support
- Safeguarding records
- Photographs, video and recorded mixes (only with consent)
- Enquiries made through our website or by email

Lawful bases

- **Legitimate interests:** running programmes, keeping attendance records, evaluation and reporting to funders in anonymised form.
- **Consent:** photographs, video, publishing recorded mixes, and optional equality monitoring. For under-18s, a parent or carer also consents.
- **Legal obligation:** safeguarding duties, financial records and responding to lawful requests.
- **Vital interests:** sharing information in an emergency to protect someone's life.

Health and equality information is special category data. We process it only to keep people safe, to make reasonable adjustments, or with explicit consent for monitoring.

How we keep data secure

- Digital records are kept in password-protected organisation accounts with two-step sign-in turned on.
- Access is limited to the people who need it.
- Paper forms are kept locked away and scanned or destroyed after the programme.
- Safeguarding records are kept separately, with access limited to the Designated Safeguarding Lead and Deputy.
- We do not keep participant data on personal phones or personal email accounts.

Sharing data

We do not sell personal data or share it for marketing. We share it only:

- With safeguarding agencies or the police when needed to protect someone
- With funders, in anonymised or summary form
- With venues, only where needed for safety (for example, numbers attending)
- With service providers who process data for us, such as our website host and email provider, under written terms that protect the data

How long we keep it

Record	How long we keep it
Participant registration and attendance	6 years after the programme ends
Evaluation responses	Anonymised after the programme report is complete; originals deleted after 2 years
Safeguarding records about a child	At least until the young person's 25th birthday, and longer where an allegation has been made about an adult working with us
Website and email enquiries that do not lead to taking part	12 months

Financial records	6 years
Photographs and recordings	Until consent is withdrawn, or 3 years after the programme, whichever is sooner

People's rights

People have the right to access their data, have it corrected, ask for it to be deleted, restrict or object to how we use it, and withdraw consent at any time. Requests can be made by email to info@opensoundcommunity.org.uk. We will respond within one calendar month.

Data breaches

If personal data is lost, shared by mistake or accessed without permission, the Data Protection Lead will:

1. Contain the breach straight away.
2. Assess the risk to the people affected.
3. Report it to the Information Commissioner's Office within 72 hours where the law requires.
4. Tell the people affected where there is a high risk to them.
5. Record the breach and what we changed to stop it happening again.

Website privacy

Our Privacy Notice, published on our website, explains how we use information people send us through the website. It forms part of this policy.

Review

We review this policy every year, and sooner if the way we use data changes, the law changes, or a breach happens.

Approval

Approved by the directors of Open Sound Community CIC on 22 October 2026: Kazim Adebola Ajao and Richard Tandoh.