



GARSINGTON OPERA
AT WORMSLEY

DATA PROTECTION POLICY

Document control

Document owner	Pippa Adamson
Date of this version	31 March 2025
Applies to	The policy applies to all contingent staff and artists, paid or unpaid at Garsington Opera, as well as partner organisations and their staff engaged in Garsington Opera activities.

Amendment history:

Version and Approval History			
Version No	Version Date	Version Comments	Approved By
1	2023		
2	March 2025	Updated job titles to reflect current responsibilities	
Future review			
Next review due		March 2026	

Contents:

Status and Scope.....	4
Purpose of the Policy.....	4
Personnel Responsible for Implementing the Policy.....	4
Data Protection Principles.....	5
Lawfulness, Fairness and Transparency.....	5
Purpose Limitation.....	6
Data Minimisation.....	6
Accuracy.....	6
Storage Limitation.....	6
Data Subjects' Rights.....	6
Security, Integrity and Confidentiality.....	6
Dealing with External Complaints.....	8

Status and Scope

This Data Protection Policy (the policy) has been approved by the Board of Trustees (the Trustees) of Garsington Opera Limited (Garsington Opera). It represents the standard to be applied by Garsington Opera when processing information, held digitally or otherwise, that identifies individuals, and sets out Garsington Opera's data protection procedures and policies.

This policy applies to all data processing activities undertaken by Garsington Opera.

This policy covers all individuals – occasionally referred to below as “data subjects” - working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as staff in this policy).

This policy does not form part of any employee's contract of employment and it may be amended at any time. However, it is part of the staff handbook and any breach of this policy will be taken seriously and may result in disciplinary action.

Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

Purpose of the Policy

During the course of Garsington Opera's (“we” or “us”) activities, we collect, store and process personal information from many different sources, the main ones being details of staff, stakeholders, supporters, fundraisers, trustees, contractors and suppliers. This information may be held on paper or on a computer or other media. Much of the information we collect that identifies living individuals will be “personal data” for the purpose of data protection legislation and is therefore subject to legal requirements.

This Data Protection Policy sets out an overview of data subjects' rights and Garsington Opera's obligations under relevant data privacy rules, which apply whenever Garsington Opera processes personal data. This may be factual data (name, address or date of birth) or it can be an opinion (such as a performance appraisal). On rare occasions, we may also process “special category” data, which is subject to more stringent legal processing requirements. Special category data includes information regarding a person's racial or ethnic origin, political opinions, religious or similar beliefs, health, criminal record and trade union membership. Such special category data may be processed where, for example, it is necessary to manage long-term sickness or injury.

Personnel Responsible for Implementing the Policy

The Trustees have overall responsibility for the effective operation of this policy but have delegated day-to-day responsibility for its operation to the Chief Finance Officer. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the Chief Finance Officer.

All managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements. Questions regarding the content or application of this policy should be directed to the Chief Finance Officer.

Data Protection Principles

Anyone processing personal data must comply with the following principles. Personal data must be:

- a) Processed fairly, lawfully and in a transparent manner.
- b) Collected only for specified, explicit and legitimate purposes.
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- d) Accurate and, where practicable, updated regularly.
- e) Not kept for longer than is necessary for the purposes for which the personal data is processed.
- f) Made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data.
- g) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- h) Not transferred to another country without appropriate safeguards being in place.
[Since Garsington Opera operates only within the U.K., we make no further reference to this principle below.]

Lawfulness, Fairness and Transparency

Privacy laws are not intended to prevent the processing of personal data, but rather to ensure that it is done fairly and without adversely affecting the rights of the data subject. The data subject must be provided with a 'Fair Processing' or 'Privacy' notice which must set out the purpose(s) for which the data is to be processed by us, and the identities of anyone to whom the data may be disclosed or transferred. We meet this requirement by providing data subjects with a copy of our Privacy Policy, or directing them to the Privacy Policy on our website.

For personal data to be processed lawfully, certain conditions have to be met. These may include, among other things, requirements that the data subject has consented to the processing, or that the processing is necessary for the legitimate interest of the data controller or the party to whom the data is disclosed. When special category data is being processed, more than one condition must be met. In most cases the data subject's explicit consent to the processing of such data will be required. If you are unsure whether explicit consent is required, please check with the Chief Finance Officer.

Purpose Limitation

Personal data may only be processed for the specific purposes notified to the data subject when the data was first collected or for any other purposes specifically permitted by Data Protection Law. This means that personal data must not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the data subject must be informed of the new purpose before any processing occurs.

Data Minimisation

Personal data should only be collected to the extent that it is required for the specific purpose notified to the data subject. Any data which is not necessary for that purpose should not be collected in the first place.

Accuracy

Personal data must be accurate and kept up to date. Steps should therefore be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards, where it is practicable to do so. Inaccurate or out-of-date data should be destroyed (save where it is necessary to retain it, e.g. gift aid declaration details required to be retained showing the donor's details for the particular tax year in which the donation was made).

Storage Limitation

Personal data should not be kept longer than is necessary for the purpose. This means that data should be destroyed or erased from our systems when it is no longer required. For guidance on how long certain data should be kept before being destroyed, contact the Operations Manager and the Garsington Opera's Data Retention Policy.

Data Subjects' Rights

Data must be processed in line with data subjects' rights. Data subjects have a qualified right to (among other things) request access to any data held about them by a data controller.

Any member of staff who receives a request from a data subject for access to their personal data must immediately refer it to the Box Office Manager.

Security, Integrity and Confidentiality

Garsington Opera must ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. Personal data may only be transferred to a third-party data processor if it agrees to comply with those procedures and policies, and puts in place adequate security measures itself.

Maintaining data security means guaranteeing the confidentiality, integrity and availability of the personal data, defined as follows:

Confidentiality means that only people who are authorised to use the data can access it.

Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.

Availability means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on our central computer system instead of individual PCs.

Providing information over the telephone: Any member of staff dealing with telephone enquiries should be careful about disclosing any personal information held by us. In particular, they should:

- Check the caller's identity to make sure that information is only given to a person who is entitled to it.
- Suggest that the caller put their request in writing if they are not sure about the caller's identity and where their identity cannot be checked.
- Refer to their line manager or the Box Office Manager for assistance in difficult situations. No one should be bullied into disclosing personal information.

Staff obligations. When processing data on behalf of Garsington Opera, you are required to follow the following guidelines:

Secure lockable desks and cupboards: ensure that you always lock desks and cupboards if they hold confidential information of any kind. (Personal data is always considered confidential).

Equipment: ensure that any confidential information on your desk or on your PC is not visible to passers-by and that papers are put away and PCs locked when left unattended.

Entry controls: if you see an unaccompanied stranger in entry-controlled areas, ask if they require assistance and either escort them to their contact or reception or, if they are not a visitor to Garsington Opera, escort them out of the entry-controlled area to a public area.

USB Sticks: no personal data may be transferred onto any disc or data stick without the permission of your line manager. Where permission is granted, the information must be encrypted. Downloading data in bulk should be avoided unless it is 'business critical'. Express permission for bulk downloads must be sought from the Operations Manager. A record of any bulk download shall be kept by the Operations Manager to enable location of the data at a later date.

Laptops and other portable media: downloading personal data onto laptops or other portable media is not generally permitted. However, if it becomes necessary to do so, no personal data may be transferred onto laptops or other portable media without the permission of your line manager or, if in doubt, the Operations Manager. Any laptop that contains personal data belonging to Garsington Opera must be password protected and the information encrypted.

Personal Equipment: do not download personal data onto your personal laptops, notepads, phones, etc unless it is necessary to do so, and only with permission. Where practicable anonymise the data (for example when taking notes at external meetings) and use

Garsington Opera's secure networks to access the system. If you must download personal data onto your personal equipment, you must do so with all due care and take steps to protect the security and integrity of the data including: the equipment must be password protected, with a suitably secure password, set with a short automatic time out and, if possible, documents must be encrypted. Any personal data downloaded onto personal equipment must be transferred to the secure system as soon as possible and permanently deleted from your personal equipment.

Data Loss: if you become aware of any data loss or potential data loss, or any actual or potential security breach you must report this immediately to your line manager or the Box Office Manager

Review: regularly review the information held about customers/suppliers/other stakeholders on Garsington Opera's databases to ensure that the information is accurate and up to date. Inaccurate and out of date information must be destroyed in accordance with our **Data Retention Policy**.

Disposal: where applicable, dispose of all confidential information securely and in accordance with our **Data Retention Policy**. Paper documents should be shredded. Floppy disks and CD-ROMs should be physically destroyed when they are no longer required.

Third parties: do not provide personal data to third parties unless you are expressly authorised to do so. If you receive a request for access to personal data from a third party and you are unsure how to respond, refer to your line manager or the Box Office Manager.

Methods of transfer: do not send discs and other media containing personal data by post. Where data on discs is to be transferred use appropriate means, such as a personal courier. Electronic files containing personal data must not be sent by email unless they are properly encrypted and secure against unauthorised access.

Use of Social Media: you may promote Garsington Opera on your personal accounts but in doing so you must not post any information that would identify any of our staff, supporters or any other individual person without express permission. *If you are in doubt about any of the above measures, speak to your line manager or the Marketing Manager.*

Dealing with External Complaints

If you receive an external complaint relating to Garsington Opera's use of personal data:

If the complaint is that the personal data is inaccurate, inform the complainant that it shall be rectified as soon as possible, update the record and notify your line manager; for a complaint of a more serious nature, including any allegation of misuse of personal data, inform your line manager who should refer to the Operations Manager immediately.

Requests for information: any member of staff who receives a written request (including by e-mail) for access to personal data should forward it to the Operations Manager immediately and inform their line manager that they have done so. If an individual makes a verbal request for access to their personal data, they should be asked to put their request in writing and told that Garsington Opera will require proof of their identity before dealing with such requests.

When providing information over the telephone: be careful about disclosing any personal information held by Garsington Opera. In particular:

- check the caller's identity to make sure that information is only given to a person who is entitled to it;
- if in doubt about the caller's identity, or where their identity cannot be checked suggest that they put their request in writing; and
- refer to your line manager for assistance in difficult situations. No one should be pressured into disclosing personal information.