



1. Purpose of this Policy

Creatful CIC is committed to protecting the privacy, rights and personal data of our employees, Makers, volunteers, partners and anyone whose information we process. This policy explains how we collect, use, store and protect personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

All staff must read, understand and follow this policy as part of their employment.

2. What is Personal Data?

Personal data is any information that identifies, or could identify, a living person. This includes names, contact details, addresses, photographs, attendance records, safeguarding notes, employment information, and digital identifiers.

Special category data includes more sensitive information such as health, ethnicity, gender identity, sexual orientation, and safeguarding information. Creatful handles this type of data with additional care and protection.

3. The Data We Collect

Creatful may collect and process the following types of data:

Employee data

- Name, address, contact details
- Emergency contact information
- Employment history and references
- Payroll and pension information
- Training records
- Sickness and absence information
- Safeguarding or conduct concerns (where relevant)

Maker and participant data

- Registration details
- Contact information
- Attendance records
- Safeguarding notes
- Photographs or video (only with consent)

- Evaluation or feedback data

Operational data

- Emails and communications
- Project documentation
- Partnership information
- Website analytics (non-identifiable)

4. Lawful Bases for Processing

Creatful processes personal data under the following lawful bases:

- Contract – to fulfil employment or service agreements
- Legal obligation – safeguarding, employment law, HMRC requirements
- Vital interests – protecting someone from harm
- Public task – delivering funded community services
- Consent – for photographs, marketing, optional data collection
- Legitimate interests – organisational administration, reporting, evaluation

5. How We Use Personal Data

We use personal data to:

- administer employment and payroll
- deliver creative wellbeing services
- maintain safeguarding records
- communicate with Makers, staff and partners
- monitor attendance and project outcomes
- meet legal and funding requirements
- improve our services and operations

We never sell personal data or share it for commercial gain.

6. Data Sharing

Creatful may share data only when necessary and lawful, including with:

- HMRC and pension providers
- Funding bodies (anonymised where possible)

- Safeguarding partners (local authority, police, NHS)
- IT service providers who support our systems
- Emergency services if required to protect someone from harm

All third-party providers must comply with UK GDPR.

7. Data Storage and Security

Creatful stores data securely using:

- password-protected systems
- encrypted devices
- secure cloud storage
- restricted access based on job role
- locked cabinets for paper records

Staff must follow all security procedures and report any concerns immediately.

8. Data Retention

We keep personal data only for as long as necessary:

- Employment records: 6 years after employment ends
- Safeguarding records: in line with statutory guidance
- Maker records: up to 3 years unless required longer for safeguarding
- Financial records: 6 years for HMRC compliance
- Photographs/video: until consent is withdrawn or project ends

After retention periods expire, data is securely deleted or destroyed.

9. Your Rights

Under UK GDPR, individuals have the right to:

- access their data
- request correction of inaccurate data
- request deletion (where lawful)
- restrict processing
- object to certain uses
- withdraw consent at any time

- request data portability

Requests should be made to the Creative Director.

10. Data Breaches

A data breach is any incident where personal data is lost, accessed, shared or used without authorisation.

If a breach occurs:

1. Staff must report it immediately to the Creative Director.
2. Creatful will assess the risk and take action to protect individuals.
3. Serious breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours, as required by law.

11. Staff Responsibilities

All staff must:

- follow this policy at all times
- keep data secure
- use Creatful devices and accounts responsibly
- avoid storing data on personal devices
- complete safeguarding and data protection training
- report concerns or breaches immediately

Failure to follow this policy may result in disciplinary action.

12. Contact

For questions, concerns or data requests, contact:

Creative Director: Nancy Fellows Email: Creatful.info@gmail.com