



INVISIBLE FLOCK CO DATA PROTECTION POLICY

We of Invisible Flock Co are committed to protecting and respecting your privacy.

This policy explains why and when we collect data from you, how we use it, any conditions under which we may disclose it to others and how we keep it secure.

Any questions can be sent to us on flock@invisibleflock.com

Who are we?

We are Invisible Flock Co, an interactive arts studio in Barnsley, Yorkshire.

We are based at: Invisible Flock Co, Unit 8a Longside, Jebb Lane, Haigh, West Bretton S75 4BS
Registered Company no.9243292 | Registered Charity no.1186255 | ICO Ref: ZB170548

What Data?

The data we may process and store about an individual, such as employees, ticket buyers, applicants and artists we work with:

- Name, address, email and phone contact details
- Communication contact preferences
- Ethnicity
- Heritage
- Nationality
- Age
- Socioeconomic status

- Sexual orientation
- Details of any disability
- Sex (only for HMRC and Arts Council England)
- National Insurance Number
- Tax Code
- Employment references
- Employment history
- Employment contract
- Personal ID (Passport)
- Pay rate
- Absence details – annual leave, sickness, maternity/paternity leave, compassionate leave, lateness
- Details of accidents and incidents at work
- Education and qualifications
- Training
- Disciplinary action
- Termination of employment
- CCTV footage and images of people

How we collect data:

- We collect data via email, CVs and applications for jobs, residencies, commissions and other opportunities for artists.
- We collect data on social media. Depending on your settings or the privacy policies for social media and messaging services like Facebook, Instagram, YouTube, LinkedIn, Mastodon, Soundcloud or Twitter, you may give us permission to access information from those accounts or services.
- We collect data for our engagement work. The data of individuals under 18 years old will only be kept after signed consent from parent, legal carer or guardian. Employees working one to one with individuals under 18 year olds or vulnerable adults require a DBS. When working in partnership with an institution such as a school, we work in line with the institution's individual DBS policy in addition to our own policy of not allowing staff without DBS to work one to one with children or vulnerable adults at any time. When working in

criminal justice settings such as prisons or youth offending institutes we are strictly forbidden to collect any personal data as this would be a security and confidentiality breach.

- We collect employees' data via email, post, paper employment forms such as contracts, passport, emergency contact form and payroll information. This is shared with a trusted outsourced payroll company in password protected documents for the purpose of paying people.
- We may encrypt sensitive data (documents and mobile devices) to ensure it safely stored or shared.
- We collect CCTV images and footage of people at Invisible Flock Co for their safety and security using CCTV cameras.

How we process and protect personal data:

- We store personal data on recruitment or applications for jobs, residencies, commissions and other opportunities for artists on our servers.
- We store our employee's emergency contacts, and pension securely on our servers, and process payroll information for HMRC.
- We store non-anonymised Equal Opportunities information on our permanent staff securely on our servers. We use this data in our reporting to Arts Council England and other funders.
- Any personal data relating to finance is held in our accounting software, protected digital files on our server and secure paper filing.
- We analyse data and share anonymised data with third parties and trusted partners for reporting purposes, for example our reporting to Arts Council England and other funders.
- Staff and freelancers who use their own devices for work purposes and connect to our server are informed of our Data Protection Policy. We assess the security of these devices, use encryption where necessary, and we give staff training on how to ensure they are secure.
- Our IT software and systems are regularly monitored and updated to ensure maximum virus protection and security. Staff are trained to identify suspicious emails or attachments, particularly from any hitherto unknown or otherwise untrusted sources, and to notify our DPO and staff responsible for IT about any potential risks.
- We may need to transfer your personal data outside the UK or European Economic Area (EEA) including to any group company or to another person with whom we have a business relationship (for example, if an artist's project is touring internationally, we may need to

share the contact details of the project team). We will only do this if there are adequate protections in place and will put in place appropriate procedures with the trusted third parties to ensure that your personal data receives an adequate level of protection and is treated by those third parties in a way that is consistent with and which respects the UK law on data protection.

- Both live and retained CCTV footage is kept securely and is only accessible by the nominated data processors within our business, for the intended purpose of maintaining building, property and occupant safety. Any nominated persons accessing the CCTV system and footage is aware of their responsibilities as it relates to GDPR and DPA guidelines.

How we dispose of data:

We will keep your information only for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal obligations. We will not keep more information than we need. The retention period will vary according to the purpose, for example:

- We delete all unsuccessful applications for jobs for 6 months after the application deadline.
- We delete all unsuccessful applications for artists' grants and support within 18 months after the application deadline.
- We ensure that any individual artist we advise has given us consent to store their data.
- We delete unsolicited CVs sent to us by email or by post.
- Inactive or bounced email addresses are removed from our mail out system Drip through automated data cleansing at least once a month.
- Every email we send to individuals via Drip includes details on how to change your communications preferences or unsubscribe from future communications. You can unsubscribe or adjust your settings to opt in to the communications they want to receive.
- We keep minimal contacts on freelancers with whom we have a business relationship with as long as is reasonably necessary.
- We keep employee records and payroll information in line with our statutory and legal obligations (6 years, plus the current financial year).
- Under normal circumstances, CCTV footage is retained for up to 1 month and then permanently deleted. We may be required to retain footage for longer and only under very special circumstances that comply with our security and privacy operating policies, such as in cases of criminal activity.

Staff are trained in best practices of securely disposing of printed personal or sensitive data. We shred or safely dispose of printed materials. Content is erased from USBs, CDs, hard-drives and other forms of electronic data storage media, and the storage device is physically destroyed.

Personal data breaches:

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. A breach could be accidental and deliberate.

- We have data breach detection, investigation and internal reporting procedures in place to ensure any breaches of personal data are dealt with and resolved as quickly as possible.
- Invisible Flock Co will report to the ICO about certain types of personal data breaches within 72 hours of becoming aware of the breach, where feasible. A summative report will in due course also be sent to The Charity Commissioners for their information once any investigation has been conducted.
- If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will also inform those individuals without undue delay.
- We keep a record of any personal data breaches.
- We have cyber security insurance to protect us if a breach should occur.

Third Parties:

Collaboration is one of Invisible Flock Co's core values. We collaborate with artists and organisations on a regular basis and we will only share your data when you have given consent or opted in.

Invisible Flock Co's policy is to check that all our third party suppliers who have access to personal data operate in line with UK GDPR. We have agreements and contracts in place with artists, partners and service providers to ensure that data is secure. Invisible Flock Co is not responsible for the privacy notices and practices of third parties.

Invisible Flock Co may include information about events and projects by third parties (such as organisations we collaborate with, have toured work to or have presented work by) in our marketing promotion via email newsletters and on social media.

Roles and responsibilities:

Invisible Flock Co's Board of Trustees recognises its overall legal responsibility for data compliance.

Day-to-day responsibility for Data Protection is delegated to a nominated Data Protection Officer.. The main responsibilities of the Data Protection Officer are:

- Ensuring that Data Protection training takes place for all staff as part of their induction and that all existing staff receive training;
- Briefing the Board on Data Protection responsibilities as required;
- Reviewing Data Protection and related policies and processes annually unless otherwise stated;
- Advising staff on Data Protection issues;
- Keep Invisible Flock Co's notification with the Information Commissioners Office up to date;
- Handling any Subject Access requests;
- Approving unusual or controversial disclosures of Personal Data;
- Approving contracts with Data Processors.

All managers have the following responsibilities:

- Assisting the Data Protection Officer in identifying aspects of their area of work that have Data Protection implications so that guidance can be provided as necessary;
- Ensuring that their operational procedures take full account of Data Protection requirements;
- Including Data Protection and confidentiality in staff induction and training (for temporary staff and volunteers as well as permanent staff).

All staff are responsible for understanding and complying with the procedures that Invisible Flock Co has adopted in order to ensure Data Protection compliance. This is also the case for freelancers contracted to work for Invisible Flock Co on a project or longer-term basis, with access to data and information stored on our servers.

Policy last reviewed: February 2025

Policy due to be reviewed on: February 2026