The National Youth Brass Band of Great Britain

Data Protection Policy (NYBBGB-POL001)

1. Introduction

This policy outlines how The National Youth Brass Band of Great Britain ("the Company") processes personal information in line with the UK GDPR and the Data Protection Act 2018. It includes principles, rights, staff responsibilities, and reporting procedures.

The Company is not formally required to appoint a Data Protection Officer. Each member of the management team is responsible for complying with this policy in full.

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2. Scope

This policy applies to all personal information held by the Company. It must be followed by employees, temporary and agency workers, subcontractors, interns, volunteers, and apprentices.

Related policies include:

- Safeguarding and Child Protection Policy
- Disciplinary, Grievance & Whistle-Blowing Policies & Procedures

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3. Definitions

(Selected definitions shown)

- **Personal Data**: Information about an identifiable individual
- **Special Category Data**: Sensitive information such as health, ethnicity, religious belief
- **Processing**: Any operation performed on data
- **Data Breach**: Accidental or unlawful loss, disclosure, or access to data

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4. Data Protection Principles

We will:

- Process lawfully, fairly, and transparently
- Collect for specified, legitimate purposes
- Minimise and limit data to what is necessary
- Keep data accurate and up to date
- Retain data only as long as necessary
- Keep data secure with appropriate technical and organisational measures

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5. Lawful Basis

We process data based on legal obligations, contract performance, legitimate interest, consent, or public interest. These are detailed in the relevant privacy notices.

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6. Special Category and Criminal Data

We process sensitive data only when a lawful condition is met (e.g., health and safety, employment obligations) and may request consent when necessary. Criminal record data is deleted within six months after use.

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7. Privacy Notices

We maintain up-to-date privacy notices for:

- Employees
- Subcontractors
- Customers, Participants, Donors & Alumni

These notices provide further details about what data is collected, for what purpose, retention periods, and rights.

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8. Rights of Individuals

You have the right to:

- Access your data
- Correct inaccuracies
- Erase data ("right to be forgotten")
- Restrict or object to processing
- Port your data to another service
- Lodge a complaint with the Information Commissioner’s Office (ICO)

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9. Responsibilities of Staff

All staff must:

- Keep data accurate and up to date
- Only access data for authorised purposes
- Follow password and device protection guidelines
- Report breaches immediately to the Data Protection Lead

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10. Data Security

Personal data must be:

- Stored securely (locked cabinets or encrypted systems)
- Not saved on local or personal devices without authorisation
- Disposed of securely when no longer needed

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11. Breach Management

All breaches must be reported using the breach form available from the Data Protection Lead. Appropriate mitigation and ICO reporting will follow if necessary.

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12. Training

Staff will receive:

- Basic data protection training at induction
- Annual refresher training
- Role-specific training for those processing sensitive or high-volume data

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13. Consequences of Breach

Failure to follow this policy may result in:

- Disciplinary action
- Contract termination (for contractors/subcontractors)
- Legal consequences for serious breaches

Contact

Mark Bromley, CEO — mark.bromley@nybbgb.org.uk

Employee Privacy Notice (NYBBGB-POL001-1)

Purpose of the Notice
To explain what personal data we collect from employees, why we collect it, and their rights.

What Personal Data We Collect

- Contact information, bank details, National Insurance number
- Emergency contacts
- Employment and education history, references
- Health data and medical records (when relevant)
- DBS and criminal record information (where legally required)
- Driving licence details (if job-related)
- Equality and diversity data (used anonymously)
- Performance, training, and conduct records

Why We Collect It / Legal Basis

- Contractual necessity
- Legal obligations (e.g. HMRC, HSE, right to work)
- Legitimate interests (e.g. managing performance, safety)
- Consent (for special category data)

How We Store and Protect Your Data

- Stored in encrypted digital systems and secure physical files
- Access limited to authorised personnel only

Who We Share Your Data With

- Payroll and pension providers
- HMRC, HSE, and other government bodies
- Legal and HR advisors
- Clients for safeguarding or logistical access

How Long We Keep Your Data

- Up to 6 years post-employment; longer for pensions, H&S, or legal matters

Your Rights
Access, correction, deletion, restriction, portability, objection, and complaints via the DPL or the ICO.

Cookies
Not applicable to staff; see the external website privacy notice for online use.

Complaints
If you have concerns about how we use your data, contact our CEO or the Information Commissioner's Office.

How to Contact Us
Mark Bromley, CEO — mark.bromley@nybbgb.org.uk

Subcontractor Privacy Notice (NYBBGB-POL001-2)

Purpose of the Notice
To explain how we process subcontractor and operative data.

What Personal Data We Collect

- Contact and bank details, NI/tax references
- Emergency contacts
- References and certifications
- Health information (where relevant)

Why We Collect It / Legal Basis

- Contractual necessity (payments, scheduling)
- Legal obligations (e.g. CIS, H&S)
- Legitimate interests
- Consent (for health/special data)

How We Store and Protect Your Data

- Stored in encrypted systems and secure filing
- Limited access by role

Who We Share Your Data With

- HMRC and accountants
- Clients for access or safety verification
- Legal or professional advisors

How Long We Keep Your Data

- Up to 6 years post-contract; longer if legally required

Your Rights
You may access, correct, delete, or restrict your data, or lodge a complaint.

Cookies
Not applicable unless accessing internal systems online.

Complaints
If you have concerns about how we use your data, contact our CEO or the Information Commissioner's Office.

How to Contact Us
Mark Bromley, CEO — mark.bromley@nybbgb.org.uk

Customers, Participants, Donors & Alumni Privacy Notice (NYBBGB-POL001-3)

Purpose of the Notice
To explain how we collect, use, store, and protect the personal data of individuals who engage with NYBBGB as clients, participants, donors, or alumni, and to outline your rights.

What Personal Data We Collect

- Full name, contact details (address, email, phone)
- Date of birth, education, and musical background
- Booking, payment, and attendance information
- Health, dietary, and accessibility needs
- Equal opportunities monitoring data (e.g. disability, ethnicity, gender)
- Financial assistance details (e.g. household income)
- Communication preferences
- Media consent (photos, video recordings)
- Donation records and subscription status
- Volunteering activity and alumni engagement
- Safeguarding data and reports

Why We Collect It / Legal Basis
We collect and process your data to:

- Manage event and course bookings
- Comply with legal and regulatory obligations (e.g. safeguarding, accounting, reporting to funders)
- Communicate effectively about activities, opportunities, and fundraising
- Assess eligibility for financial support or access needs

Our lawful basis includes contractual necessity, legal obligation, consent (e.g. for marketing and media), and legitimate interest.

How We Store and Protect Your Data

- Data is stored on secure cloud-based systems including Gmail, Google Drive, PayPal, and Stripe
- All payment data is encrypted and processed by secure third parties
- Access is restricted to trained personnel and protected through authentication and access controls

Who We Share Your Data With

- Venues and service providers (e.g. dietary needs for catering)
- Arts Council England and funders (in anonymised formats unless otherwise required)
- Regulatory authorities (e.g. Charity Commission, ICO, HMRC)
- Banks and technical service providers (for donations, bookings, or mailing systems)
- Legitimate authorities (for safeguarding and child protection)

We never share your data with third parties for their own marketing or fundraising.

How Long We Keep Your Data

- Event/booking/payment data: retained for 7 years
- Financial support data: as per payment data
- Health and dietary data: deleted after each course or activity
- Alumni records: basic details retained indefinitely unless requested otherwise

- Safeguarding and child protection incident data the latter of 10years or the 25th birthday of the subject of the incident

Your Rights
You have the right to:

- Access your data and request corrections
- Request deletion or restriction of processing
- Withdraw consent for marketing or special category data
- Object to processing or request data portability
- Lodge a complaint with the ICO

Cookies
Cookies are used on our website to support functionality and analytics. Details can be found in our Cookie Policy.

Complaints
If you have concerns about how we use your data, contact our CEO or the Information Commissioner's Office.

How to Contact Us
Mark Bromley, CEO — mark.bromley@nybbgb.org.uk