

Sherlock Bone GDPR Policy

1. Policy Statement

Sherlock Bone is committed to protecting the privacy and personal data of all individuals involved in our activities, including staff, contractors, workshop participants, and partner organisations.

We process personal data in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, ensuring data is handled lawfully, fairly, transparently, and securely.

2. Purpose of This Policy

This policy explains how we:

- Collect and use personal data
- Store and protect personal information
- Ensure compliance with data protection law
- Uphold individuals' rights regarding their data

3. Scope

This policy applies to:

- All employees, freelancers, volunteers, and contractors
- All workshop participants (children and adults)
- All data processed in relation to workshops, administration, and communications
- Both digital and paper-based records

4. Data We Collect

We may collect and process the following types of personal data:

4.1 Staff and Contractors

- Name and contact details
- Employment or contract information

- DBS check status (where applicable)
- Payroll and payment information

4.2 Workshop Participants

- Name and contact details
- Emergency contact information
- Attendance records
- Medical or accessibility information (where necessary and consented)
- Safeguarding-related information (where applicable)

4.3 Organisational Data

- Client and partner organisation details
- Communication records (emails, booking forms, feedback forms)

5. Lawful Basis for Processing

We only process personal data where we have a lawful basis under UK GDPR, including:

- Consent (e.g. marketing or optional data collection)
- Contractual necessity (e.g. workshop bookings)
- Legal obligation (e.g. safeguarding or tax requirements)
- Legitimate interests (e.g. improving services, workshop delivery)

Where special category data (e.g. health information) is processed, additional safeguards and explicit consent will be used where required.

6. How We Use Personal Data

We use personal data to:

- Deliver and manage educational workshops
- Ensure participant safety and safeguarding
- Communicate with staff, participants, and partners
- Process bookings, attendance, and payments
- Improve workshop quality through feedback

- Comply with legal and regulatory obligations

7. Data Security

We take appropriate technical and organisational measures to protect personal data, including:

- Password-protected systems and secure storage
- Restricted access on a need-to-know basis
- Secure disposal of physical documents
- Encryption where appropriate
- Staff training on data protection and security

8. Data Sharing

We do not sell personal data.

We may share data only when necessary with:

- Safeguarding authorities or emergency services (when required)
- DBS checking services (for safeguarding compliance)
- Payment processors or accountants (for financial administration)
- Venue providers (where required for workshop delivery)

All third parties are required to handle data securely and lawfully.

9. Data Retention

We retain personal data only for as long as necessary for its intended purpose, including:

- Legal and safeguarding requirements
- Financial and administrative obligations
- Operational needs

Data is securely deleted or destroyed once no longer required.

10. Individual Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion of their data (where applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent (where applicable)

Requests should be made to the Data Protection Lead.

11. Data Breaches

In the event of a data breach, we will:

- Take immediate steps to contain and assess the breach
- Notify the Information Commissioner's Office (ICO) where required
- Inform affected individuals if there is a high risk to their rights or freedoms
- Review and improve procedures to prevent recurrence

12. Children's Data

Where we process data relating to children:

- We take additional care to ensure lawful and appropriate handling
- We obtain consent from a parent or guardian where required
- We ensure safeguarding procedures are followed at all times

13. Responsibilities

13.1 Organisation

- Ensure compliance with GDPR and data protection laws
- Provide training and guidance to staff
- Maintain secure systems and procedures

13.2 Staff and Contractors

- Handle personal data responsibly and securely
- Follow organisational procedures at all times
- Report any data breaches or concerns immediately

14. Training and Awareness

All staff involved in handling personal data will receive:

- GDPR and data protection training
- Regular updates on best practices and legal changes
- Guidance relevant to their role

15. Policy Review

This policy will be:

- Reviewed annually
- Updated in response to legal or operational changes
- Communicated to all relevant staff and contractors

16. Contact Information

For any data protection queries or requests, contact:

Data Protection Lead: Dany Green

Email: dgreen@sherlockbone.co.uk

Organisation: Sherlock Bone

Signed: D. K. Green

Dated: 07.05.2026

To be Reviewed: 07.05.2027