



# Replay Music CIC – Privacy Policy & Data Retention Schedule

RE-PLAY MUSIC is a registered C.I.C no. 15352459, incorporated in England and Wales  
The Long Barn, Rodden, Frome, Somerset, BA11 5LD  
[www.re-playmusic.org](http://www.re-playmusic.org)

## 1. Introduction

Replay Music CIC is committed to protecting the privacy and personal data of participants, families, supporters, staff, volunteers, freelance music leaders, contractors, and community partners.

This policy explains how we collect, use, store, and dispose of personal data in line with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Relevant safeguarding and employment legislation

All personal data is processed lawfully, fairly, transparently, and securely.

## 2. What Data We Collect

Replay Music CIC collects and processes personal data in line with the UK GDPR principles of:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality

We collect only data that is adequate, relevant, and limited to what is necessary for safe and effective programme delivery.

### 2.1 Community Centres, Schools, and Ongoing Programmes

For structured programmes requiring registration and safeguarding oversight, we may collect:

- Participant name

- Parent/carer name and contact details (email, telephone, postal address)
- Emergency contact information
- Relevant medical, accessibility, or support needs (where voluntarily disclosed and necessary for safe participation)
- Attendance records
- Photography/filming opt-out records (where applicable)

This information is processed to:

- Meet safeguarding and duty of care obligations
- Provide reasonable adjustments and inclusive access
- Communicate programme information
- Maintain attendance and monitoring records
- Fulfil reporting requirements to funders or partners

Only information strictly necessary for these purposes is collected and retained.

## **2.2 Live Festivals and Open-Access Workshops**

For open-access festival events and informal public workshops, Replay Music CIC operates on a data minimisation basis.

We generally do **not collect identifiable personal data** from participants attending these sessions.

Where applicable, we may:

- Record photography/filming opt-out requests
- Collect anonymised attendance numbers for monitoring and impact reporting

Emergency contact details or detailed personal information are not routinely collected in these settings unless required due to a specific safeguarding concern.

## **2.3 Staff, Directors, Volunteers & Freelancers**

Where relevant to the role and engagement, Replay Music CIC may collect and process:

- Contact details
- Recruitment documentation and references
- DBS check status (the certificate itself is not retained; only the date of the check, certificate number, and outcome are recorded)
- Training and safeguarding records
- Contractual or engagement documentation

This information is processed to:

- Ensure safe recruitment and safeguarding compliance
- Meet legal and regulatory obligations
- Maintain appropriate training records
- Manage contractual or volunteer engagement responsibilities

We collect only information that is necessary, proportionate, and relevant to the role.

## **2.4 Financial Information**

- Donation history
- Payment records
- Gift Aid declarations (where applicable)

## **2.5 Technical Data**

- Website usage data
- IP address information via cookies

## **2.6 Correspondence**

- Emails, enquiries, and administrative communications

Replay Music CIC does not collect special category data unless necessary for safeguarding, accessibility, or legal compliance, and only where a lawful basis applies.

## **3. Lawful Basis for Processing**

We process personal data under the following lawful bases:

- **Contractual Obligation** – To provide workshops, sessions, and event participation
- **Legal Obligation** – To comply with HMRC, safeguarding, employment, and regulatory requirements
- **Legitimate Interest** – To manage and develop services responsibly
- **Consent** – For marketing communications where required

**Implied Consent:** Attendance at workshops, festivals, and live events constitutes consent for photography/filming, as clearly communicated via signage and verbal explanation. Participants may **opt out** at any time (see Section 4).

## 4. Photography, Filming & Opt-Out Procedure

Photography and filming may occur at workshops, festivals, and live events to:

- Document project delivery
- Collect outcome and impact data
- Share achievements online
- Demonstrate impact to funders and the wider public

### Important Notes:

- Clear signage and verbal explanation inform participants that attendance implies consent.
- Photography/filming is **limited to workshops, festivals, and live events**; it is not standard practice at other locations unless specifically communicated.

### Opt-Out Procedure

**Participants or parents/carers may opt out at any time. Replay Music CIC will:**

- **Exclude the participant from further filming**
- **Delete any identifiable footage already collected from active systems**
- **Maintain secure records of opt-out requests**
- **Honour opt-outs promptly and respectfully**

## 5. Data Retention & Deletion Schedule

We comply with the GDPR principle of storage limitation and retain data only for as long as necessary.

### Financial & Fundraising Records

- Gift Aid Declarations: 6 years after the relevant accounting period (HMRC requirement)
- Donation Records: 6 years plus the current financial year

### Safeguarding Records

- Children's Safeguarding Records: Retained until the individual's 25th birthday
- Adult Safeguarding Records: Retained for 6 years after case closure unless legal proceedings require longer

## **Recruitment & Governance**

- DBS Checks: We record only
  - Date of check
  - Certificate number
  - OutcomeCertificates are not retained.
- Director Meeting Minutes: Retained permanently as the official legal record of the CIC

## **Staff & Volunteer Records**

- Personnel/Volunteer Files: Retained for 6 years after engagement ends
- Unsuccessful Applicants: Retained for 6 months

## **Correspondence**

- Routine emails: Deleted when no longer required
- General enquiries: Deleted 2 years after last contact

## **Photography & Media**

- Retained only while relevant for reporting, promotion, or impact evidence
- Deleted promptly upon opt-out where identifiable

## **Marketing Lists**

- Deleted immediately upon unsubscribe request

## **6. Secure Storage & Disposal**

When data reaches the end of its retention period:

- Digital records are permanently deleted and overwritten in encrypted backups
- Paper records are securely shredded
- Access to personal data is restricted to authorised Directors and designated personnel only

## **7. Your Rights**

Under UK GDPR, individuals have the right to:

- Access their personal data

- Request correction of inaccurate information
- Request erasure (where legally permissible)
- Object to processing
- Withdraw consent for marketing communications at any time

Requests will be responded to within one calendar month.

If you are not satisfied with our response, you may contact the Information Commissioner's Office (ICO).

## 8. Contact

### **Replay Music CIC**

The Long Barn, Rodden, Frome, Somerset, BA11 5LD

Email: [Insert Email Address]

Phone: [Insert Contact Number]

## 9. Policy Governance & Review

- **Policy Owner:** Director responsible for Safeguarding & HR
- **Approved by:** Board of Directors, Replay Music CIC
- **Review Frequency:** Annual
- **Version:** v1.2
- **Next Review Date:** [Insert Date]

### **Signed:**

Lisa Branigan

Founding Director – Replay Music CIC