

In-Spire Sounds CIC

Data Protection & Privacy Policy

Revised and expanded version — August 2026

Important note

This revised document keeps the substance of the September 2025 policy supplied by In-Spire Sounds and adds a dedicated public-facing Privacy Notice and implementation guidance. It should be reviewed against In-Spire Sounds' actual data flows, contracts, software providers and retention schedule before final adoption.

Part 1 — Data Protection & Privacy Policy

Introduction

In-Spire Sounds is committed to protecting the privacy and security of personal information. We recognise our responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 to ensure that all personal data we collect, store and use is handled lawfully, fairly, and transparently.

This policy sets out how In-Spire Sounds manages personal data relating to trustees, freelancers, volunteers, participants (including young people and vulnerable adults), visitors and partners. We acknowledge our particular responsibility when handling data about young people and vulnerable adults, and will apply additional safeguards where appropriate.

Scope

This policy applies to all trustees, freelancers, volunteers, contractors and anyone acting on behalf of In-Spire Sounds.

Commitments

In-Spire Sounds will:

- Collect and process only the personal data necessary to deliver our services and activities.
- Be transparent about what data we collect, why we collect it, and how it will be used.
- Ensure personal data is accurate, kept up-to-date, and retained only for as long as necessary.
- Store data securely and protect it from unauthorised access, loss or misuse.
- Pay special attention to data relating to young people and vulnerable adults, ensuring parental/guardian consent is obtained where required.
- Respect individuals' rights to access, rectify or erase their data, or to object to certain processing.
- Ensure that all trustees, freelancers and volunteers handling personal data are trained and aware of their responsibilities.

Personal Data We May Collect

Depending on the context, In-Spire Sounds may collect:

- Contact details (name, address, email, phone number).
- Demographic information (age, gender, ethnicity, where voluntarily provided).

- Health or accessibility information (only where necessary for safeguarding, accessibility or participation).
- Emergency contact details.
- Safeguarding records (where relevant, kept securely and confidentially).
- Financial information (e.g. where freelancers are paid for services).
- Photographs or media (only with consent).

Lawful Basis for Processing

In-Spire Sounds will process data under one or more lawful bases defined in the UK GDPR, including:

- Consent (e.g. use of photographs, communication preferences).
- Contract (e.g. freelancer agreements).
- Legal obligation (e.g. safeguarding, HMRC requirements).
- Legitimate interests (e.g. delivering services and managing activities).
- Vital interests (e.g. medical emergencies).

Responsibilities

- Trustees hold overall responsibility for compliance with data protection law.
- Freelancers and volunteers must follow this policy and only collect or use personal data as instructed by In-Spire Sounds.
- Participants and parents/guardians must provide accurate information and keep us informed of any changes (e.g. emergency contact details).
- Breaches of this policy may lead to disciplinary or contractual action.

Data Security

In-Spire Sounds will:

- Store data securely (password-protected systems, locked storage for paper files).
- Restrict access to personal data only to those who need it.
- Use secure methods when sharing information with third parties (e.g. encrypted email where required).
- Dispose of data securely when no longer needed.
- Ensure third-party suppliers (e.g. cloud services) meet UK GDPR standards.

Data Sharing

In-Spire Sounds will only share personal data where necessary and lawful, such as:

- With emergency services, where vital interests are at risk.
- With safeguarding partners, if there are concerns about a young person or vulnerable adult.
- With funders or regulators, where anonymised or required by law.
- We will never sell personal data to third parties.

Data Retention

Personal data will only be kept for as long as necessary for the purpose for which it was collected, in line with statutory and safeguarding requirements. After this period, data will be securely deleted or anonymised.

Rights of Individuals

Everyone whose data we hold has the right to:

- Access their personal data.
- Request correction of inaccurate or incomplete data.
- Request deletion of their data (where lawful to do so).
- Restrict or object to certain processing.
- Request data portability.
- Withdraw consent (where processing is based on consent).

Requests should be made in writing to info@inspiresounds.co.uk. We will respond within one calendar month.

Data Breaches

Any suspected or actual data breach must be reported immediately to the Trustees. Serious breaches will be assessed and, where legally required, reported to the Information Commissioner's Office (ICO) without undue delay and, where applicable, within 72 hours of becoming aware of the breach. Affected individuals will be informed where required.

Monitoring and Review

In-Spire Sounds will:

- Review this policy annually, or sooner if legislation or working practices change.
- Ensure training and guidance are provided to trustees, freelancers and volunteers.
- Monitor compliance and take action to address gaps or risks.

Complaints

Complaints regarding data protection or privacy will be taken seriously, investigated promptly, and handled confidentially. If you are not satisfied with our response, you may raise your concern with the Information Commissioner's Office (ICO): www.ico.org.uk | Tel: 0303 123 1113.

In-Spire Sounds ICO registration reference number: C1201143.

Last updated: August 2026

Next review due: August 2027

Part 2 — Public-Facing Privacy Notice

This is the notice to publish on the In-Spire Sounds website and make available when personal information is collected.

Who we are

In-Spire Sounds CIC is the organisation responsible for deciding how and why personal information is used for our activities, programmes, services and administration. We are a Community Interest Company based in Oxford, England. ICO registration reference: C1201143.

For data protection questions, requests or concerns, contact: info@inspiresounds.co.uk.

What personal information we may collect

Depending on your relationship with us and the service or activity involved, we may collect:

- Name and contact details.
- Date of birth/age and other information needed to administer participation.
- Parent/guardian and emergency contact details.
- Information about accessibility needs, health or medical information where necessary for safe participation or safeguarding.
- Demographic information where voluntarily provided for equality, monitoring or funder reporting.
- Safeguarding information where relevant.
- Information supplied through referrals, including referrals from schools, colleges, local authorities, youth services or other partner organisations.
- Information relating to bookings, attendance, participation, achievements and outcomes.
- Photographs, audio or video where the relevant permissions and lawful basis apply.
- Payment, invoicing and financial information where we pay or are paid for services.
- Information provided through our website, email, forms or other communications.

Where we get information from

We may collect information directly from you, from a parent or guardian, or from an organisation referring or commissioning a service. This may include schools, colleges, local authorities, youth services, funders or partner organisations. Where information comes from another source, we will provide the relevant privacy information required by law.

Why we use personal information

We use personal information to:

- Deliver music, creative, mentoring, educational, alternative provision and community activities.
- Register participants, manage attendance and communicate about activities.
- Safeguard young people, vulnerable adults, staff, volunteers and visitors.
- Make reasonable adjustments and support accessibility and safe participation.
- Manage bookings, contracts, payments, freelancers and suppliers.

- Administer our organisation and meet legal, regulatory and accounting requirements.
- Monitor outcomes and report to funders, commissioners and regulators.
- Evaluate and improve our programmes.
- Respond to enquiries and requests.
- Send marketing or newsletters where we are permitted to do so and, where consent is required, where you have given it.
- Use photographs, recordings or other media for agreed publicity, documentation or project purposes where the relevant lawful basis applies.

Our lawful bases

The lawful basis depends on what we are doing with your information. Depending on the circumstances, we may rely on:

- Consent — for example, certain photography/video, communications or optional uses of information.
- Contract — where processing is necessary to enter into or perform an agreement.
- Legal obligation — where we are required to keep or provide information by law.
- Legitimate interests — where processing is necessary for our legitimate organisational interests and those interests are not overridden by your rights and interests.
- Vital interests — for example, where information is necessary to protect someone's life in an emergency.

Where we process special category information, such as health information, we will also identify and rely on an appropriate additional condition under UK data protection law. The particular condition will depend on the circumstances.

Children and young people

We work with children and young people and recognise the additional care required when handling their information. We aim to collect only information that is necessary, restrict access to those who need it, and explain our use of information in clear and accessible language. We may provide additional, age-appropriate privacy information or just-in-time explanations for young people.

Sharing information

We do not sell personal information. We may share information where necessary and lawful with organisations such as:

- Schools, colleges, local authorities, commissioners and referring organisations involved in delivering or arranging services.
- Parents or guardians where appropriate and lawful.
- Safeguarding partners and emergency services where necessary.
- Funders, auditors, regulators or evaluators where required by a funding or commissioning arrangement or by law.
- Professional advisers, payment providers, IT/cloud service providers and other suppliers who process information on our behalf.
- Other organisations where you have given permission or where another lawful basis permits or requires the sharing.

We only share information that is appropriate and necessary for the relevant purpose and take reasonable steps to ensure suppliers protect personal information.

International transfers

Some technology or service providers may process information outside the UK. Where this occurs, we will ensure that any international transfer is made in accordance with applicable UK data protection requirements and that appropriate safeguards are in place where required.

How long we keep information

We keep personal information only for as long as it is needed for the purpose for which it was collected, taking account of legal, accounting, contractual, safeguarding, funding and operational requirements. Retention periods vary by type of information. When information is no longer required, we securely delete it or anonymise it where appropriate.

Our detailed retention periods are maintained through our internal records and retention arrangements and may differ between participant, safeguarding, financial, contractual and marketing records.

Your rights

Depending on the circumstances, you may have rights to:

- Ask for access to your personal information.
- Ask us to correct inaccurate information.
- Ask us to delete information where there is no lawful reason for us to keep using it.
- Ask us to restrict certain processing.
- Object to processing in certain circumstances, including processing based on legitimate interests.
- Receive certain information in a portable format where the right applies.
- Withdraw consent where we rely on consent. Withdrawing consent does not affect processing that took place before withdrawal.

To exercise a right, contact info@inspiresounds.co.uk. We may need to verify your identity before responding. We normally respond within one month, although applicable law allows extensions in certain circumstances.

Complaints

If you have concerns about how we use your personal information, please contact us first at info@inspiresounds.co.uk so that we can investigate.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's independent data protection regulator. ICO website: <https://ico.org.uk/>

Cookies and our website

Our website may use cookies and similar technologies. Some cookies are necessary for the website to function, while others may be used for analytics, preferences or other purposes. Where consent is required, we will ask for it before using non-essential cookies. Our website cookie information should explain the cookies actually in use on the site.

Automated decision-making

We do not currently use solely automated decision-making that produces legal or similarly significant effects on individuals. If this changes, we will update our privacy information and provide the information required by law.

Changes to this notice

We review this notice regularly and may update it when our activities, technology, suppliers or legal requirements change. The latest version will be published on our website.

Last updated: August 2026

Next review: August 2027

Part 3 — Implementation / Compliance Actions

- Publish the Privacy Notice prominently on the website, including a link in the footer and wherever personal information is collected.
- Add a short privacy-information link or wording to participant/enrolment forms, AP referral paperwork, website contact forms, mailing-list sign-up, freelancer onboarding and other relevant forms.
- Create an age-appropriate short privacy explanation for young participants, particularly where children are asked to provide information directly.
- Maintain a data map/Record of Processing Activities covering participant data, AP referrals, safeguarding, photography/video, marketing, website enquiries, finance/payroll, funder reporting and supplier systems.
- Create or maintain a retention schedule with specific periods for key record types rather than relying only on 'as long as necessary'.
- Check every third-party software/service used by In-Spire Sounds (for example website, cloud storage, email, forms, accounting, mailing lists and project systems) for data-processing terms, security and international-transfer arrangements.
- Review photography/video consent separately from general programme consent. Consent should be specific and capable of being withdrawn where consent is the lawful basis.
- Document the additional UK GDPR condition used whenever special category information such as health information is processed.
- Keep a data-breach log and internal breach procedure, including an assessment of whether ICO notification is required.
- Review this policy and the public Privacy Notice at least annually and whenever a significant new processing activity is introduced.

Important legal drafting note

The lawful basis for individual activities should be confirmed against In-Spire Sounds' actual contracts, funding arrangements, AP commissioning arrangements, forms and operational practice. This document deliberately does not invent specific providers, retention periods or contractual arrangements that were not present in the supplied policy.

Part 4 — In-Spire Sounds Data Storage, Access & Security Arrangements

Primary storage environment

In-Spire Sounds uses Google Workspace and associated Google services as its primary environment for storing and managing organisational information. Personal information is intended to remain within the organisation's managed Google environment rather than being routinely downloaded to personal computers or unmanaged devices.

Access controls

Access to personal information is restricted to authorised In-Spire Sounds staff and other authorised users who require access for their role. Access permissions are managed through the organisation's Google Workspace environment. In-Spire Sounds aims to apply the principle of least privilege, so users are given access only to information and systems necessary for their responsibilities.

Downloading and local copies

In-Spire Sounds does not routinely download personal information from its managed Google environment for local storage. Where technically appropriate, organisation settings are used to restrict downloading, copying or other forms of external access by users outside the organisation's managed environment. Staff must not create unnecessary local copies of personal information or store organisational personal data in personal accounts or unmanaged storage.

Secure sharing

Where personal information or files need to be sent outside the organisation, In-Spire Sounds uses secure sharing arrangements appropriate to the sensitivity of the information. Where a file needs to be transmitted securely by email or an equivalent method, In-Spire Sounds uses Egress secure email/file-transfer services. Staff should use the secure method required by organisational procedures rather than sending sensitive personal information as an ordinary email attachment.

Website

The In-Spire Sounds website is hosted by Wix. Website-related personal information is therefore subject to the security, processing and data-protection arrangements applicable to Wix and the relevant services enabled on the In-Spire Sounds website. In-Spire Sounds will review its Wix configuration and enabled applications periodically and will maintain appropriate processor and privacy documentation.

Cloud-service and international-transfer checks

Use of cloud services does not by itself mean that all information is stored in the UK. The ICO explains that organisations should establish which legal entity they contract with and whether a cloud provider or its subprocessors make personal information accessible outside the UK. Where a restricted transfer occurs, In-Spire Sounds will ensure that an appropriate UK GDPR transfer mechanism and any required safeguards are in place.

In-Spire Sounds will therefore maintain appropriate documentation for Google Workspace, Wix and any other service that processes personal information, including relevant data-processing terms, subprocessors and international-transfer arrangements where applicable.

Security review

The organisation will periodically review user access, shared drives/folders, external-sharing settings, account security, devices used to access organisational information, and the configuration of third-party services. Where Google Workspace security controls are available and appropriate to the organisation's subscription, In-Spire Sounds will use them to reduce the risk of unauthorised access, copying or disclosure.

Important qualification

The above describes In-Spire Sounds' stated operating arrangements. It does not represent a certification that Google Workspace, Wix or Egress store every item of data exclusively in the UK. Cloud providers may use international infrastructure or subprocessors. The organisation should retain the relevant provider agreements and verify its current configuration and transfer arrangements as part of its data-protection records.