



JAMIE CALLAGHAN STUDIOS

Data Protection (GDPR) Policy

	Name	Role	Signature
Prepared By	Jamie Callaghan	Director	J. callaghan
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	Name	Role	Signature
Approved By	Jamie Callaghan	Director	J. callaghan

POLICY LAST REVIEWED: September 2025

NEXT REVIEW: September 2026

POLICY REVIEW CYCLE:

Reviewed annually (every year) or as a matter of course in response to changes in legislation, processes, business offers etc.

POLICY REVIEW HISTORY:

Version	Date	Reason For Review	Reviewed By
V1	Sept 25	First Issue	JC, BT

WHERE TO FIND THIS POLICY:

This policy can be found on:

- Jamie Callaghan Studios website
- On secure drive

Additionally, hard copies can also be provided on request by emailing benjamintwist@jcallaghanstudios.co.uk

INTRODUCTION:

Jamie Callaghan Studios is committed to processing data lawfully, securely and in accordance with General Data Protection Regulations (GDPR) 2018.

Jamie Callaghan Studios is committed to ensuring there are strong policies as well as strong internal procedures regarding data protection as well as being transparent about the data we hold on individuals.

The responsible person(s) for applying General Data Protection Regulations in the organisation (known as the Data Protection Officer) is **Jamie Callaghan**

Jamie Callaghan Studios is registered with the Information Commissioners Office (ICO)

DATA PROTECTION PRINCIPLES:

Article 5 of The General Data Protection Regulations (GDPR) requires personal data to **be processed lawfully, fairly and in a transparent manner in relation to individuals:**

- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes - further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed - personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

HOW WE COLLECT DATA:

Jamie Callaghan Studios collects & processes the following data upon client registration:

- Name, email & phone numbers of clients
- Name, email & phone numbers of parents, carers and/or other legal guardian(s)
- Emergency Contact Information (such as phone number)
- Client Medical & Support Needs (such as a Medical Questionnaire)
- Consent Information (such as photographic consent, trips out consent etc.)
- Any assessment data (such as baseline assessments designed to determine which course level to place a client in according to their needs)

Jamie Callaghan Studios also collects & processes the following data for other purposes:

- Name, email & phone numbers of staff/volunteers upon application
- Staff/Volunteer Health Declaration Information (such as medical issues, next of kin)
- Recruitment Application Forms (for staff & volunteer recruitment)

All data collected & processed by Jamie Callaghan Studios will be kept on the Information Asset Register (Register of Systems) and will be reviewed at least annually.

LAWFUL, FAIR & TRANSPARENT PROCESSING:

Jamie Callaghan Studios will maintain an Information Asset Register (also known as a Register of Systems) which will be maintained at least annually.

All individuals we hold information on have the right to access their information, this is known as making a Subject Access Request (SAR); any such requests should be made by emailing the Data Protection Officer (Jamie Callaghan) on jamiecallaghan@jcallaghanstudios.co.uk

All data we hold on individuals must be accurate & up to date.

Jamie Callaghan Studios is always working to ensure we process as minimal data on individuals as possible to ensure we aren't holding any unnecessary data on individuals.

Marketing

From time to time, we may choose to run marketing campaigns, such as allowing people to opt in to receive email notifications about new services, offers & other events at Jamie Callaghan Studios.

Any such marketing campaigns must have mechanisms allowing people to opt out of receiving marketing communications at any time and this should be communicated clearly.

DATA RETENTION

Jamie Callaghan Studios is committed to holding as minimal amounts of data on individuals as possible, as well as not keeping individual data for longer than needed.

Personal data on individuals either working for or a client of Jamie Callaghan Studios will be kept for as long as they are active as a member/volunteer/employee and for up to 7 years after they have left.

If any individuals would like to leave Jamie Callaghan Studios and be deleted from all records, they should email the Data Protection Officer on jamiecallaghan@jcallaghanstudios.co.uk

After up to 7 years from date of client or other individuals leaving Jamie Callaghan Studios, all personal data will be destroyed and not just deleted (e.g. shredding printed information)

INFORMATION SECURITY:

Jamie Callaghan Studios will ensure that electronic personal data is stored using secure & modern software which is regularly updated.

Jamie Callaghan Studios will ensure that access to personal data is strictly restricted to those on a 'need to know' basis and appropriate security is in place to prevent unauthorised access.

Appropriate back-up & disaster recovery systems shall be in place.

When personal data is deleted, this should be done in a way which is irrecoverable (destroyed).

DATA BREACHES:

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data – the Data Protection Officer (Jamie Callaghan) will promptly assess the risk to individual's rights & freedoms and if appropriate, report the breach to the Information Commissioners Office (ICO).