

OTG register of personal data processing activities

This summarises authorized personal data processing activities of OTG. Additional authorizations may also be recorded in committee meeting minutes, but this document should be updated without undue delay if this happens.



13 th May 2018	Initial version
31 st May 2020	Updates in connection with the launch of new membership management platform
5 th September 2020	Update audition section to reflect use of electronic signups and audition forms. Add details about NHS Track and Trace, and COVID monitoring forms.

Membership management

Oxford Theatre Guild stores some or all of the following information about its members:

Name

Address

Phone number

Email address

Interests relating to involvement with productions

Membership status, renewal dates, levels

Relationships to other individuals where family memberships are taken up

Mailing preferences

Date of birth (for under 18s)

Financial records about contributions/memberships

This information is used:

to send out weekly emails (“Prompt”) and official charity correspondence

to manage membership subscriptions and renewals

to identify suitable candidates for production roles (information about individuals may be shared with relevant production team members)

for effective management of our Child Protection policy

Information about members is kept until 18 months after that members' subscription lapses. At that time, address data is removed. Other data is retained so that we can occasionally contact old members to invite them to events, to store opt-out information if they wish not to be contacted, or in case there is a specific need to contact a member about a matter relating to their membership or OTG activities. Information about their past memberships is kept in order to keep accurate statistical information about past memberships.

Additionally, if a member chooses to pay by Direct Debit or card, our payment processors GoCardless or Stripe will process their bank account/card details on our behalf.

Where government guidance is in place recommending the collection of contact details for [NHS Track and Trace](#), relevant records from the membership records will be shared with Track and Trace on request. Participants have the right to opt out of this sharing by writing to the membership secretary.

OTG processes these data on the basis of the performance of a contract between OTG and the member, to fulfil legal obligations (child protection), and on the basis of a legitimate interest (old members).

An additional record of all changes to the membership system is maintained for up to two years. This is used solely for the purpose of ensuring the accuracy of changes.

Auditions

Contact information and biographical information about an individual is collected through an auditionees form, and sometimes a separate audition sign-up process using Eventbrite or a similar system. This information is collected on the basis of a legitimate interest and legal obligations (child protection).

Information collected via the audition sign-up process

Name

Email address

Phone number

Preferences for audition times

Information collected directly through the form:

Name

Address

Phone number

Email address

Date of birth (if under 18)

Stage experience

Parts interested in

Information collected by the director during auditions

Notes about suitability for a part

Data will be retained as follows

Information related to non-successful applicants, and audition notes for all applicants, will be retained until the end of the production process

Contact details for successful applicants will be used for membership administration purposes and retained for the duration of the membership

The paper forms and any notes taken during auditions are to be retained by directors to support the audition process. They may optionally be transcribed into electronic format and shared with the committee and senior production staff only as required for the purpose of managing the casting process. Audition forms, notes and electronic copies thereof should be destroyed at the end of the production.

Electronic signups and audition forms, where used, will be accessible only to those with a specific need to use them to administer the auditions, including directors, production managers, and committee liaisons (and NHS Track and Trace; see below).

These data are processed on the basis of legitimate interest (see separate LIA).

Additionally, auditionees are invited to complete a survey, including to consent to further email communications about productions. This form includes

Name

Email address

Production roles interested in

This information could also be received via website contacts or referrals from other OTG members or contacts. Where this happens, a record of explicit consent shall be recorded.

These are to be stored by committee members, and passed to senior production team members on an as needed basis. They are processed on the basis of consent.

Where government guidance is in place recommending the collection of contact details for [NHS Track and Trace](#), relevant records from the audition sign-up system will be shared with Track and Trace, on request. Participants have the right to opt out of this sharing by selecting the appropriate option in the signup system.

COVID-19 monitoring forms

Information about the health status of individuals (whether they or members of their household have any recognised COVID-19 symptoms) will be collected on a regular basis

from participants in in-person activities. This information is held on the basis of legal obligations and on the basis of preventative and occupational medicine, and will be held on a secure online system with access strictly controlled to those who need the information to safely manage events, as well as committee members and their delegates, with a responsibility for managing health and safety. It will be used to make decisions about whether a given participation should continue, and whether safety advice should be given to other participants. The information will be deleted after 30 days.

Accident forms and known conditions

Details about accidents are recorded on paper forms and held by the committee. They are used to review accidents according to our legal obligations and H&S policy. They are stored on paper securely by the committee and destroyed after 5 years.

These data are held on the basis of legal obligations and for medical conditions on the basis of preventative and occupational medicine.

Details about known conditions are recorded in a dedicated secure online storage with access limited to the OTG H&S officer and others with a strict need to know for the purposes of preventative and occupational medicine. They are destroyed on request or three years after the person ceases involvement with OTG.

Productions

Contact details of cast and crew are processed by the senior production team to enable the management of rehearsals and production week. These details should be deleted at the end of the production. In addition, email addresses will be added to group email addresses for shared communication. These group email addresses should be deleted by the end of May in the year following the production. This enables the committee and others to communicate with the production teams about follow-up matters such as annual review contributions.

Cast and crew lists (including extra information such as availability information, costume measurements) might also be shared with others with an official role in a production where that use is required for the production. When this happens, the receiver should be informed that these data should only be used for the specified purpose, and only necessary subsets of data used.

In addition, names, production roles and biographical information (as supplied by the individual) will be displayed publicly on the website and in programmes.

Where government guidance is in place recommending the collection of contact details for [NHS Track and Trace](#), relevant records from production records will be shared with Track and Trace, on request. Participants have the right to opt-out of this sharing by informing the production manager.

These data are processed on the basis of a legitimate interest (see separate LIA).

Expense claims

Data about expense claims processing is handled by the committee members, and senior production staff. The following data is collected as part of the process:

Name

Address

Details of purchases

Bank details (only by the Treasurer and authorized deputies if BACS payment is requested)

These data are processed on the basis of a legitimate interest (see separate LIA) and, once paid, under a legal obligation basis (need to keep accountancy records as required by the Charities Commission). They are deleted/destroyed once they are no longer needed for accountancy purposes.

Trustee registration

Data about trustees is collected as part of the trustee registration process:

Name

Address

Date of birth

Declaration of suitability

This information is collected on trustee declaration forms (charity commission form) and submitted to the charity commission in accordance with our legal obligations. A copy is stored whilst a trustee is current and in accordance with our legitimate interests.

Information about trustees may be shared with an organisation with a legitimate need to know, in order to authenticate our charitable status. Any such sharing must be preceded by reasonable advance notice to trustees, with information about the rationale, and adequate safeguards, being provided.

Additionally, contact information about trustees is stored in OTG's email system and in other records on a legal obligation basis in the course of running the charity.

Show marketing

Contact lists are maintained on Mailchimp for show marketing purposes on a consent basis. The information stored is limited to what is needed to manage that system. Posting policies are established in the privacy notice and third party sharing of OTG lists with others is not permitted.

Ticket sales

When OTG sells tickets via the Tickets Oxford box office or other similar systems, the tickets come with names and addresses on them. This enables us to identify the ticket holders when they collect tickets. The data is not used for any other purpose, and uncollected tickets are destroyed promptly.

Photography

OTG uses photography in the course of promoting shows and other activities both internally and externally, and for archival purposes.

Where photographs are taken of actors in production rehearsals or performances on behalf of OTG involving adults, or as part of headshots or a dedicated promotional photoshoot, this collection is done under the basis of a legitimate interest (see separate LIA).

In all other cases where photographs are taken on behalf of OTG (such as backstage photographs) and for under 18s, consent is required (and photographers should be made aware of cases where they are likely to photograph those for which consent is not available).

In cases where consent has been collected, this should be filed by the production manager and details passed to the committee afterwards.

When photography happens in a rehearsal room or in any situation where it might not be apparent (such as during closed rehearsals in a theatre) cast should be made aware of the photographers' presence.

Third party processors

OTG uses the following third party processors (within the GDPR meaning):

Mailchimp

Google

Gocardless

Mythic Beasts

Stripe

Eventbrite