

# PRIVACY NOTICE



## Scope

This notice applies to all data subjects whose data is processed by Make Some Noise.

## Responsibilities

As a Data Controller Make Some Noise is responsible for ensuring that all potential data subjects have sight of this notice prior to the collection and/or processing of their personal data by Make Some Noise.

Make Some Noise is required to ensure that this notice is brought to the attention of all data subjects, securing their consent for the processing of their personal data.

## Who we are

Make Some Noise are a Stafford based charity working with schools, communities and businesses. Our inclusive music workshops and needs-led projects bring people together to inspire positive change and social impact. **We inspire positive social, emotional and educational progress through music!**

## What is Personal Data?

The EU's General Data Protection Regulation ("GDPR") defines "personal data" as:

*"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".*

The GDPR classifies certain data as belonging to "special categories", which include Racial origin; Ethnic origin; Political opinions; Religious beliefs; Membership of a trade-union; Genetic data; Biometric data; Health data; Data concerning a natural person's sex life; Sexual orientation; and Other.

The GDPR requires us to identify a Lawful Basis/Condition for processing your personal data. We are also required to have an additional Condition for processing Special Category Data. The relevant Condition(s) will depend on the reason for your involvement with Make Some Noise. Details of the Lawful Basis/Condition for each category is shown later.

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### Postal address:

c/o 2 Staffordshire Place,  
Tipping Street, Stafford, ST16 2DH

### Postal address:

Eastgate House  
Eastgate Street, Stafford, ST16 2NG

01785 278 454  
info@make-some-noise.com

[make-some-noise.com](http://make-some-noise.com)

  [makesomenoisewm](https://www.facebook.com/makesomenoisewm)

### **The legal basis on which we use this data**

The law requires us to have one or more of the 6 lawful grounds to collect and use your personal information (GDPR Article 6). The following are relevant to the purposes set out above:

Explicit Consent: Consent of the data subject.

Contract Purposes: Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

Legal Obligation: Processing is necessary for compliance with a legal obligation

Vital Interests: Processing is necessary to protect the vital interests of a data subject or another person

Public Interest: Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Legitimate Business Interests: Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

### **The Conditions required for collection of Special Category Data**

In addition, we are required to have an additional condition in order for us to process "Special Category Data". Special Category Data includes racial and/or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation (GDPR Article 9). The following are relevant to the purposes set out above.

Consent: The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where prohibited by Union or Member State law.

Employment, Social Security or Social Protection Law: processing is necessary for the purposes of carrying out the rights of the controller or of the data subject in the field of employment and social security and social protection law where allowed provided appropriate safeguards are in place.

Vital Interests: processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

### **Why does Make Some Noise need to collect and store personal data?**

The data, why we collect and how we use it will depend on how and why you are involved with Make Some Noise and further details can be found later in this document.

We collect data to record participants and their attendance at workshops, analyse and report on our projects and events to our funders, to help us communicate with subscribers, donors and participants about opportunities and projects and to improve our online presence. We will also collect information if you apply to join the Make Some Noise team as a member of staff, freelance musician, volunteer or Trustee; if you contract us to provide workshops for your school/venue/organisation, if we contract you to provide a service or make a purchase from you.

Make Some Noise is committed to ensuring that all personal information collected and processed is appropriate for the stated purpose(s) and shall not constitute an invasion of your privacy. We may share your personal data with third party service providers who are contracted by us (eg recording participant details and attendance record on our database) and we shall ensure that they will hold your personal data securely and shall use it only in order to fulfill the service for which they are contracted. When there is no longer a service need, or the contract comes to an end, the third party will dispose of all personal data according to agreed procedures. We will never share your personal data with third parties until we have received your consent; unless we are required do so by law.

### **How Make Some Noise uses your information**

Make Some Noise will process your data (i.e. collect, store and use) according to the requirements of the GDPR at all times and shall endeavor to keep your personal data up-to-date, ensuring its accuracy and will not keep it for longer than it is required. In some situations, there are set legal requirements for the length of time that Make Some Noise will retain your personal data but usually Make Some Noise will use its discretion, ensuring that personal data is not kept outside of our usual business requirements. These will be set out in the Data Retention Schedule of our Data Protection Policy.

We shall never be intrusive or invasive of your personal privacy and shall not ask you to provide data that is irrelevant or unnecessary and we will enact strict measures and processes to ensure that the risk of unauthorised access or disclosure of your personal data is minimised as much as possible.

The data we will collect will depend on the type and reason for your interaction with Make Some Noise. Further information can be found at the end of this Notice.

### **Your Rights under GDPR**

Under data protection legislation you have the following rights:

- The right to be informed how your personal data is processed
- The right of access to your personal data
- The right to rectification
- The right to erase
- The right to restrict processing

- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling
- The right to lodge a complaint with a supervisory authority

To make a request for your personal information contact please email or write to us – see Contact Us below.

You may withdraw your consent at any time (please contact us for details). Please note that where we have a legal obligation to collect your data that it may not be possible.

**Specific information can be found below for:**

[Participants and Parents/Carers](#)

[Partners/venues providing the participant data \(eg schools, youth clubs\)](#)

[Freelance Sessional Workers](#)

[Non-sessional contractors and business customers](#)

[Staff, Work Placements, Trustees and Volunteers](#)

[Donors](#)

[Website and Social Media](#)

**Contact us**

By post: Make Some Noise, c/o 2 Staffordshire Place, Tipping Street, Stafford ST16 2LP

By phone: 01785 278454

By email: [info@make-some-noise.com](mailto:info@make-some-noise.com)

## PARTICIPANTS AND PARENTS / CARERS

### What information do we collect about you and how do we use it?

When you and/or your child or adult that you care for take part in a Make Some Noise workshop as a participant we may collect data from you when you register or attend. This information may include personal and/or sensitive category data: name, email, address, postcode, phone number, date of birth, gender, ethnicity and information about challenges you may face such as disabilities, medical information, attendance information, information about progress and achievements.

We may also collect information when you voluntarily complete questionnaires or feedback forms.

Information may also be provided by a third party (eg school or youth club) when they contract us to run workshops in their venue.

### What is our lawful basis/condition for processing your information?

We process your personal information as this is necessary to meet our **Legal and Contractual Obligations** (eg safeguarding, health and safety and reporting to the funders and other relevant authorities eg Youth Music, MOD, BBC Children in Need, local authorities).

We require your **Consent** to retain your special category data. We request this information as it enables us to complete the statistical returns for our funding and/or it enables us to identify further funding opportunities. Much of our funding is received to pay for work with a specific demographic (eg Mental/Physical Health, Young Parents, Military families).

### Who might we share your information with and how?

#### To meet our legal and contractual obligations

We will complete statistical returns to our funders, Companies House, and Charities Commission as we are required to do. ***We only ever provide numerical data and would only share more detailed information with your prior agreement or if there was a safeguarding issue.***

#### Recording/Filing Systems

Your details will be entered into our databases/filing systems so we can record your attendance at sessions and produce the statistics we need. This data is held securely and can only be accessed by members of the Make Some Noise team for whom it is necessary and relevant for them to do their role.

Personal and Special Category Data will be stored in the Substance Views database whose servers are all based in the UK.

Google Drive will be used to maintain a session register but only names will be entered and no other information. After the last session attendance will be added to our main database and the Google Drive register deleted.

### Photos and Film Footage

Photos and film are classed as personal information. We will from time to time photograph projects– including workshops, performances and/or events/training to use as evidence to report to our funders and in our marketing.

If the programme involves accreditation such as AQA Unit Awards Schemes or Arts Award then photos and/or film footage it may be required as part of the qualification.

You will be informed in advance if photography and/or filming is going to take place and will be asked to provide your written Consent that it is take place and for how we can use it.

We will always notify participants that a photographer or film maker will be at a session or event, and by bringing to our attention that you do not want to be photographed or filmed when this happens, we can ensure the photographer or film maker is aware of this at the time.

If you see a photo or a film in the public domain in which you appear where you have requested not to be included please inform us in writing to [info@make-some-noise.com](mailto:info@make-some-noise.com) with details of the photo/film/where seen and we will remove it as soon as possible or take measures to edit accordingly where possible.

### **How long do we keep your information?**

7 years from your/your child's last attendance.

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7 years from your/your child's last attendance.

## **PARTNERS/VENUES PROVIDING THE PARTICIPANT DATA (eg schools, youth clubs, nurseries)**

### **Obligations and rights as joint data controllers**

- Partners/Venue will provide demographic information, including SEND information where appropriate
- Data provided to Make Some Noise by the partner/venue will be used for the purposes outlined below
- All Make Some Noise employed and freelance team adhere to our Policies including Data Protection, Safeguarding etc.

### **What information do we collect and how do we use it?**

When delivering workshops in your venue Make Some Noise require you to provide data about the participants. This information may include personal and/or sensitive category data: name, email, address, postcode, phone number, date of birth, gender, ethnicity and information about difficulties you may have such as disabilities, medical information, attendance information, information about progress and achievements.

We may also collect information when you voluntarily complete questionnaires or feedback forms.

### **What is our lawful basis/condition for processing your information?**

We process your personal information as this is necessary to meet our **Legal and Contractual Obligations** (eg safeguarding, health and safety and reporting to the funders and other relevant authorities eg Youth Music, MOD, BBC Children in Need, local authorities).

We require **Consent** to retain special category data. We request this information as it enables us to complete the statistical returns for our funding and/or it enables us to identify further funding opportunities. Much of our funding is received to cover the costs of working with a specific demographic (eg Mental Health, Young Parents, Military families). When providing this information you are confirming that you are following your own organisational Policies and have the entitlement/permissions to share this information with us.

### **Who might we share your information with and how?**

#### To meet our legal and contractual obligations

We will complete statistical returns to our funders, Companies House, and Charities Commission as we are required to do. *We only ever provide numerical data and would only share more detailed information with your prior agreement or if there was a safeguarding issue.*

### Recording/Filing Systems

Personal and/or Special Category details will be entered into our databases/filing systems so we can record participant attendance at sessions and produce the statistics we need. This data is held securely and can only be accessed by members of the Make Some Noise team for whom it is necessary and relevant for them to do their role.

Personal and Special Category Data will be stored in the Substance Views database whose servers are all based in the UK.

Google Drive will be used to maintain a session register but only names will be entered and no other information. After the last session attendance will be added to our main database and the Google Drive register deleted.

### Photos and Film Footage

Photos and film are classed as personal information. We will from time to time photograph projects– including workshops, performances and/or events/training to use as evidence to report to our funders and in our marketing.

If the programme involves accreditation such as AQA Unit Awards Schemes or Arts Award then photos and/or film footage is may be required as part of the qualification.

You will be informed in advance if photography and/or filming is going to take place and will be asked to provide your written Consent that it take place and for how we can us it.

We will always notify participants that a photographer or film maker will be at a session or event, and by bringing to our attention that you do not want to be photographed or filmed when this happens, we can ensure the photographer is aware of this at the time.

If you see a photo or a film in the public domain in which you appear where you have requested not to be included please inform us in writing to [info@make-some-noise.com](mailto:info@make-some-noise.com) with details of the photo/film/where seen and we will remove it as soon as possible or take measures to edit accordingly where possible.

### **How long do we keep your information?**

7 years from the last attendance at a workshop.



## FREELANCE SESSIONAL ROLES

### **What information do we collect about you and how do we use it?**

When you apply to join Make Some Noise in a freelance sessional role we collect the information we require to carry out our Safer Recruiting process, this will include personal information and special category data, references and details of any criminal records (where the role meets the requirements of the legislation for a Disclosure and Barring Service (DBS) check). Most contracts with Make Some Noise which involve sessions with children and young people or vulnerable adults will require a DBS Enhanced with Barred List check.

We have a Legal obligation to the participants that we work with to ensure that they are safeguarded at all times. The information also helps to inform the development of freelance recruitment and safeguarding policy.

If you complete our Safer Recruiting process and are accepted as a member of our freelance team you will be required to join and maintain a subscription to the DBS Update Service and give us permission to undertake online checks which will happen annually – as a minimum. We will also retain details of training and meetings attended on your Safeguarding record.

We may also collect your details via an Equal Opportunities Monitoring Form, as some funders wish us to provide details of the demographic of our team – only statistical information would be provided.

We will also collect the information necessary for our financial and banking processes so that we can pay your invoices and complete our statutory financial reporting.

We may also collect information when you voluntarily complete questionnaires or feedback forms and participate in events. Website usage information may be collected using cookies.

### **What is our lawful basis/condition for processing your information?**

We can process your personal information as this processing is necessary for the performance of our **Contracts** with you.

We require your **Consent** to retain your special category data. We request this information as some of our funders ask for information about the demographic of our freelance team.

### **Who might we share your information with and how?**

#### Workshop Venue(s)

Venues will have names of the freelance team. We may be asked to confirm that you hold a DBS Certificate and the date carried out. A venue (eg school) may wish to see your DBS Certificate on arrival. Our Safeguarding Officer may be required, legally, to share specific information with a 3<sup>rd</sup> party.

### Financial Systems

Your details will be recorded into our financial systems and bank account to enable the payment of your invoices. Information provided on your invoices will be seen by our Accountant and Auditor during our financial accounting and audit processes.

### Recording/Filing Systems

Your details will be entered into our databases/filing systems so we can record Safeguarding processes and monitor contract performance.

### Public

Your name, photograph and brief biography you provide will appear on our website. Your name may be included in our Annual Report submitted to Charities Commission and Companies House. Your photo may also be used in marketing materials and/or on social media.

### Funders

Statistical information may be required when reporting to our funders. Your name, photograph and brief biography may appear in fundraising applications and campaigns.

Make Some Noise has robust processes in place to ensure that the confidentiality of personal data is maintained and there are controls in place regarding access to it and its use. Decisions on whether Make Some Noise releases personal data to third parties are subject to a strict approval processes.

### **How long do we keep your information?**

Personal information relating to your application will be kept in secure conditions. If you are unsuccessful, your personal data will normally be destroyed after 6 months (or as set out in our Data Protection Policy). If you are successful, the data will be retained as set out below.

The length of time we keep data depends on what it relates to:

- Safeguarding Information (Application Form, References, copy contracts, training records etc) will be retained for at least 15 years, as required by our Safeguarding Policy, legislation or our Insurers
- Financial Records will be retained for a minimum of 6 years in line with statutory requirements and Policy
- Please see the Schedule in our current Data Protection Policy for full details.

## **NON-SESSIONAL CONTRACTORS AND BUSINESS CUSTOMERS**

### **What information do we collect about you and how do we use it?**

When you enter into a contract with Make Some Noise we may collect personal information about you. This may include personal, organisational or business information, references, bank details etc.

We will also collect the information necessary for our financial and banking processes so that we can pay your invoices and complete our statutory financial reporting.

We may also collect information when you voluntarily complete questionnaires or feedback forms and participate in events. Website usage information may be collected using cookies.

### **What is our lawful basis/condition for processing your information?**

We can process your personal information as this processing is necessary for the performance of our **Contracts** with you.

### **Who might we share your information with and how?**

#### Financial Systems

Your details will be recorded into our financial systems and bank account to support financial processes. Information provided on invoices from you may be seen by our Accountant and Auditor during our financial accounting and audit processes.

#### Recording/Filing Systems

Your details may be entered onto our databases/filing systems so we can monitor contract performance.

#### Public

Depending on the services you provide to Make Some Noise you may be asked to provide a photograph and brief biography to go on our website. Your name may be included in our Annual Report submitted to Charities Commission and Companies House.

#### Funders

Statistical information may be required when reporting to our funders. Your name, photograph and brief biography may appear in fundraising applications and campaigns.

Make Some Noise has robust processes in place to ensure that the confidentiality of personal data is maintained and there are controls in place regarding access to it and its use. Decisions on whether Make Some Noise releases personal data to third parties are subject to a strict approval processes.

**How long do we keep your information?**

- Financial Records will be retained for a minimum of 6 years in line with statutory requirements and Policy
- Please see the Schedule in our current Data Protection Policy for full details.

## STAFF, WORK PLACEMENTS, TRUSTEES, VOLUNTEERS

### What information do we collect about you and how do we use it?

When you apply for a salaried role, to be a Trustee, to undertake a work placement or volunteer in a non-sessional role at Make Some Noise we collect the information we require to carry out our Safer Recruiting process, this will include personal information and special category data, references and details of any criminal records (where the role meets the requirements of the legislation for a Disclosure and Barring Service (DBS) check). Where a contract involves working with or supervising those who work with children and young people or vulnerable adults will require a DBS check at an Enhanced with Barred List level.

We have an obligation to the participants that we work with to ensure that they are safeguarded at all times. The information also helps to inform the development of recruitment and safeguarding policy.

If you complete our Safer Recruiting process and are accepted in a role that requires a DBS check you will be required to join and maintain a subscription to the DBS Update Service and give us permission to undertake online checks which will happen annually – as a minimum. We will also retain details of training and meetings attended on your Safeguarding record.

We may also collect your details via an Equal Opportunities Monitoring Form, as some funders wish us to provide details of the demographic of our team – only statistical information would be provided.

We will also collect the information necessary for our financial and banking processes so that we can pay your salary and/or expenses and complete our statutory financial reporting.

We may also collect information when you voluntarily complete questionnaires or feedback forms and participate in events. Website usage information may be collected using cookies.

### What is our lawful basis/condition for processing your information?

We can process your personal information as this processing is necessary for the performance of our **contracts** with you and to meet our **Legal Obligations** in reporting (eg HMRC).

We request this information in order **to meet our obligations under Legal and Social Security Law**. Some of our funders ask for information about the demographic of our team.

## **Who might we share your information with and how?**

### Workshop Venue(s)

If you are required to visit a venue such as a school we may be asked to confirm that you hold a DBS Certificate and the date carried out. A venue (eg school) may wish to see your DBS Certificate on arrival. Our Safeguarding Officer may be required, legally, to share specific information with a 3<sup>rd</sup> party.

### Financial Systems

Your details will be recorded into our financial systems and bank account to enable the payment of your Salary or expenses. Information may be seen by our Accountant and Auditor during our financial accounting and audit processes.

### Recording/Filing Systems

Your details will be entered into our databases/filing systems so we can record Safeguarding processes and performance.

### Public

Your name, photograph and brief biography you provide may appear on our website. Your name may be included in our Annual Report submitted to Charities Commission and Companies House.

### Funders

Statistical information may be required when reporting to our funders. Your name, photograph and brief biography may appear in fundraising applications and campaigns.

Make Some Noise has robust processes in place to ensure that the confidentiality of personal data is maintained and there are controls in place regarding access to it and its use. Decisions on whether Make Some Noise releases personal data to third parties are subject to a strict approval processes.

## **How long do we keep your information?**

Personal information relating to your application will be kept in secure conditions. If you are unsuccessful, your personal data will normally be destroyed after 6 months (or as set out in our Data Protection Policy). If you are successful, the data will be retained as set out below.

The length of time we keep data depends on what it relates to:

- Safeguarding Information (Application Form, References, copy contracts, training records etc) will be retained for at least 15 years, as required by our Safeguarding Policy, legislation or our Insurers
- Financial Records will be retained for a minimum of 6 years in line with statutory requirements and Policy
- Please see the Schedule in our current Data Protection Policy for full details.

## **DONORS**

### **What information do we collect about you and how do we use it?**

If you make a make a donation by post or in person we will use your contact details to acknowledge receipt of the donation. We may write to you inform you about impact as a result of your donation and/or invite you to future events.

If you make a donation through a third party fundraising platform (eg Just Giving, Virgin Money Giving, Pay Pal) your information may be shared with us. These independent third parties will only do so when you have indicated that you wish to support Make Some Noise and with your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

### **What is our lawful basis/condition for processing your information?**

We process your personal information as this is necessary to meet our legal obligations required when reporting to relevant authorities.

### **Who might we share your information with and how?**

We will not share your personal information with any third party, except under compulsion of law or where it is necessary to share it with Companies House, Charity Commission or HMRC (eg Gift Aid).

Our accountant and auditors may see information relating to your donation to meet our financial obligations.

### **How long do we keep your information?**

In line with the Charities Act your data will be held for six years from the end of the year when you made your most recent donation.

# WEBSITE AND SOCIAL MEDIA

## Statistical Data

Make Some Noise collects information from all website visitors using statistics tools. This information includes (but is not limited to) the date and time of visit, browser name and version, IP address, and referring website. This information is used for evaluating and further developing the website for our digital audiences. No personal data is collected via statistics tools.

## Contact Data for the Mailing List

When you sign up to our online mailing list, we ask you to enter personal data in the form of your name, email address and any preferences around what you'll receive. Your email address is collected so we can send you updates about our work, to inform our programme and to report to our funders. The information we share with funders is not connected to personally identifiable information and is made up of aggregated data. We ask for your consent when joining our mailing list and this forms the lawful basis for us holding the data.

## Google Analytics

We use [Google Analytics to inform us about our digital audience demographics](#), including: the age and gender of our users, along with the interests they express through their online travel and purchasing activities. We will use the data provided by Google Analytics to develop our website and content around our users' interests. The data is provided in aggregate and is not personally identifiable to us.

You can [opt-out](#) of Google Analytics using their add-on to disable tracking by Google Analytics and you can see [Google's privacy policy here](#).

## How long will I stay on the Mailing List?

Make Some Noise will regularly review our mailing list and refresh it by asking anyone that doesn't open an email from us for twelve consecutive months to acknowledge their wish to keep receiving emails, or otherwise. You can unsubscribe at any time by clicking the Unsubscribe link at the bottom of emails.

## How can I stop you from sending me Emails?

Under the GDPR you have the right to withdraw your consent to us holding your personal data. Should you choose to do this we are obliged to act on your request as soon as possible and at least within one month.

Every email we send you will have an unsubscribe option at the bottom and additionally you can send us an email at any time to [info@make-some-noise.com](mailto:info@make-some-noise.com)

## Cookies

What are cookies and how do we use them?

The use of cookies is common practice on modern websites. A cookie is a small text file which is placed on your computer's hard drive by a website. When you visit one of our websites, your browser checks to see if it has any cookies for it and sends the information contained in those cookies back to the site in order to tailor and improve your experience.

Our cookies record things like whether you are currently logged into your website account, to ensure you're given the right access on each page. They ensure the display settings you've previously selected (for example, preferred language) – or the settings associated with your account permissions – are activated correctly.

We also use cookies to collect anonymous usage and visitor behaviour information – this includes IP address, operating system, browser type and pages visited. We use this to track



how our websites are used, measure their effectiveness, and to help us improve our content and user experience.

### **Third Party Cookies**

Some of the services on our websites, such as adverts from CharityJob, videos from YouTube, and sharing functions from Facebook, Twitter, Instagram or LinkedIn, may also place cookies on your computer. We do not take responsibility for third party cookies.

### **Can I Refuse Cookies?**

Yes, you can use your browser settings to disable cookies. Different browsers offer different levels of control – for example you may be able to accept certain cookies and reject others, such as third-party cookies.

If you refuse cookies, please be aware our websites may not work smoothly for you and there will be certain parts that won't function correctly.

You can delete the cookies stored on your computer at any time.

### **More Information**

For further information about cookies, you can visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

For a full list of the cookies we use and what they do, please email [websitehelp@ncvo.org.uk](mailto:websitehelp@ncvo.org.uk).

### **Other Websites**

Our websites contain links to other websites not run by Make Some Noise. This privacy policy only applies to Make Some Noise websites so when you link to other websites you should read their own privacy policies.