
Privacy Notice for Arts Membership Pilot Programme

3 June 2025



Introduction

1 This Privacy Notice applies to Bath Spa University Arts Membership Pilot Programme Members. Bath Spa University (the **University**) is a public university which has its main campus at Newton Park, Newton St Loe, Bath, BA2 9BN.

2 We are committed to safeguarding the privacy of our Arts Membership Pilot Programme Members; this Notice sets out how we will treat your personal information when you register and take part in the Arts Membership Pilot Programme. We are the data controller which means we are responsible for deciding how we collect and use your personal information.

3 Please see the [policy section of our website](#) to access our full Data Protection Policy and our further privacy notices (including privacy information for our website users).

What data do we hold?

4 We collect and process personal information from you in for the purposes of participating in the Arts Membership Pilot Programme. This includes:

- Your contact details
- Your emergency contact details
- Medical information and access needs
- Diversity, Equality and Inclusion data

5 We may also receive personal information indirectly, from the following sources in the following scenarios:

- Health and safety data from a facilitator should anything happen during one of the sessions
- Attendance records from facilitators

Why do we process your personal data, and what is the legal basis for that processing?

6 The legal bases we are relying on for collecting and processing the information for each of the purposes are as follows:

PURPOSE OF COLLECTING INFORMATION	LEGAL BASIS FOR PROCESSING INFORMATION
Name and contact details, and any further information required for your attendance of sessions. Without personal data we may not be able to provide the Membership offer to you.	Contract

Diversity, Equality and Inclusion data is needed for reporting to our funders (West of England Combined Authority and Arts Council England) with whom we have a contractual obligation to carry out this project. Data will be aggregated anonymously.	Contract with West of England Combined Authority and Arts council England. Consent: This information is provided voluntarily by you to enable BSU to provide monitoring information.
To ensure your safety and the safety of others at University premises. To facilitate the provision of appropriate security of Members on site. As an Arts Member, we need to collect some details about you to prioritise your safety and the safety of others. This information helps us conduct necessary risk assessments and to take any medical conditions or access needs you have into account.	Legal obligation Consent

7 Where we collect and process special category personal data about you, we have identified the following conditions:

- Reasons of substantial public interest to enable the monitoring of equality of opportunity or treatment between different groups
- Explicit consent

Who has access to your personal data?

8 Your personal data will only be shared internally or to third parties who have been appointed by the University to provide a specific service on behalf of the University in connection with the Culture West programme.

9 We will share your personal data with third parties where required by law, where it is necessary to administer the University's relationship with you in connection with the Culture West programme or where we have another legitimate interest in doing so.

10 We may also share your personal data with third parties if we have a legal obligation to do so or for the purposes of a regulatory reporting requirement.

11 We may share your personal data with third party service providers who act on our behalf such as IT services providers and our professional advisers. Where it is necessary to do so, we may need to share your information with them, so that they can carry out the services we have requested.

Transfer of Data to Other Countries

12 Occasionally the University may be required to share your personal data with organisations either based in the UK/European Union (EU), or in countries outside the EU that have equivalent levels of protection. These transfers of data are usually necessary in order to meet contractual responsibilities and would only happen once we were assured that the appropriate safeguards were in place.

Information Security and Retention Period

13 Your personal data is collected and stored in line with relevant Data Protection law and is stored securely using processes and systems that comply with the University's strict information security and Data Protection principles.

14 We will only keep the information that you provide for as long as is necessary for the purpose for which it is processed and in accordance with relevant legislation. We will retain your information for a period of two years in order to inform you of the outcome of the Arts Membership Pilot Programme. We will then dispose of your information by deleting data from Microsoft 365 by implementing a retention and disposal configuration.

Your rights

15 You have various rights in relation to your information, including:

15.1 The right to access the information we hold;

15.2 The right to request rectification or erasure of the information that we hold;

15.3 The right to request that we restrict what we are doing with your information;

15.4 The right to object to what we are doing; and

15.5 The right to request your information in a portable format.

16 Please note that some of these rights may not apply to the information that we hold about you, and we may need to collect some form of proof of identity before acting on your request.

17 Where we have relied upon your consent to process your information, you also have the right to withdraw your consent at any time.

18 If you would like to exercise any of these rights, or have any other questions about this Notice, please contact the University's Information Compliance Team at data-protection@bathspa.ac.uk.

19 You also have the right to make a complaint to the Information Commissioner's Office about how we use your information, although we would ask that you get in touch with us first in order that we can try to put things right. How to contact the Information Commissioner's Office can be found at <https://ico.org.uk/concerns/>.