

DEBORAH HOSKINS DANCE PRIVACY POLICY

Last Updated - 1st September 2021

Deborah Hoskins Dance (DHD) is committed to process any personal information it holds only in ways that are fair, transparent and in accordance with the Data Protection Act and its successor the General Data Protection Regulations (GDPR) which came into effect on 25th May 2018.

DHD will take particular care over email addresses which, in addition to the GDPR, are subject to the Privacy and Electronic Communication Regulations (PECR).

The legislation sets out various data protection principles. These ensure that personal information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

As the data controller, DHD will process any confidential information given during registration. The data will be stored securely, no longer than necessary and solely for the completion of the school's activities.

GDPR includes 7 rights for individuals:

1) The Right to be informed

What data is stored

Parents/Guardians/Students

Parent/Guardian name, address, contact details, student name, date of birth, medical information, special educational needs information, emergency contact details, consent to photograph and video for students.

Parent contact details will be used only to email relevant communications pertaining to their child's class or course, invoicing and newsletters holding important information and term dates. Telephone numbers may be used as a secondary form of contact for urgent or important information.

Student names, dates of birth, medical information, special educational needs information and emergency contact information are required for health and safety and child protection purposes.

Student information including name and date of birth will be provided to the ISTD examinations boards should a parent consent to their child taking an examination. Students over 16 are required to provide photographic ID when taking vocational examinations with the ISTD.

Staff and Teachers

As an employer, DHD is required to hold data on its staff and teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance Numbers, photographic ID, right to work, bank details. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK.

Payment Details

DHD does not store credit card or payment details nor do we share customer details with any 3rd parties except where there is a legal right or duty to disclose.

Personal data will be retained as required by law and stored securely. It will then be destroyed and deleted securely once a student has ceased classes after the duration of our legal obligation to hold the records.

DHD uses Cookies on its website to collect Google Analytics; this data is anonymous.

2) The right of access

All students, participants, parents and staff have the right to know what personal information is held about them.

DHD tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by asking. DHD will provide a response within 1 month. If we do hold information about you we will:

- give you a description of it.
- tell you why we are holding it.
- tell you who it could be disclosed to.
- let you have a copy of the information in an intelligible form.

3) The right to erasure

All students, participants, parents and staff have the right to withdraw their consent for their personal data to be retained at anytime, where there is no compelling reason for its continued use such as Child Protection Records, etc.

Once the legal retention period has elapsed, records will be securely destroyed and any paper records shredded.

*To withdraw or request information, contact 07772284827 or deborah@deborahhoskinsdance.co.uk

**Please be advised, if a parent wishes to withdraw personal information while their child is still enrolled in classes with DHD, this may affect their ability to continue in classes due to health and safety and child protection reasons.*

4) The right to restrict processing

All students, participants, parents and staff can object to DHD processing their data. This means that records can be stored but must not be used in any way, for example for exam submissions, reports or communications.

5) The right to data portability

DHD requires data to be transferred from one IT system to another such as dance associations for examinations. Teachers use class registers held on a cloud system where only the students' name, age and any relevant medical information is disclosed. Registers are held on the Class4Kids app and Bookwhen app and are password protected. In cases where online systems fail, paper registers will be used by teachers and securely shredded once the information on attendance is transferred to the computer system.

6) The right to object

All students, participants, parents and staff can object to their data being used for certain activities like marketing or research.

7) The right not to be subject to automated decision-making including profiling.

Automated decisions and profiling are used for marketing based organisations and in some organisations for the purposes of staff recruitment. DHD does not use personal data for such purposes.

HOW DHD COLLECTS AND STORES DATA

All student and staff records are kept on a secure online platform. Class4Kids for children and Bookwhen for adult students. Paper documents including staff details and certificates, student exam slips, are stored in a locked filing cabinet at the home of the Principal Deborah Hoskins. Only Deborah Hoskins can have access to these files. Paper records are shredded after the retention period.

DHD stores personal data held visually in photographs or video clips or as sound recordings, only when written consent has been given. No names are stored with images in photo albums, displays, on the website or on DHD's social media sites.

Access to all administrative and booking software is password protected. When a member of staff leaves the company, these passwords are changed.

DHD sometimes uses Google Cloud services, primarily Google Forms for gathering examination consent from parents or for signing up students for theatre trips or performances. All information is held by Google outside of the EU, however is securely kept and password protected. Google participate in the E.U – U.S Privacy Shield Framework and comply with the Privacy Shield Principles. <https://www.privacyshield.gov>

DHD uses Class4Kids to process and collect booking information, invoicing and students registrations for children's classes. This software is password protected. Please see the Class4Kids privacy policy for more details. <https://clubs.classforkids.co.uk/privacy-cookie-policy/>

DHD uses Bookwhen to process and collect booking information, invoicing and students registrations for adult classes. This software is password protected. Please see the Bookwhen privacy policy for more details. <https://bookwhen.com/privacy>

Parents and students are able to pay for class fees online with through PayPal or, when paying by card, Stripe. DHD does not process any online payment information. Please see the PayPal Privacy Policy and Stripe Privacy Policy for more details. <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev> <https://stripe.com/en-gb/privacy>

All students, participants, parents and staff have the right to complain to the ICO (Information Commissioner's Office), if they believe there is a problem with how their data is handled.