

Kercher Theatre School

GDPR: General Data Protection Regulation Policy

Statement:

GDPR stands for General Data Protection Regulation, replacing the previous Data Protection, which came into effect on 25th May 2018.

GDPR states that personal data should be 'processed fairly and lawfully' and collected for specified, explicit and legitimate purposes' and that individual's data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Kercher Theatre School is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors, volunteers, examiners, guests and staff personal data.

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

GDPR includes 7 rights for individuals:

1. The right to be informed

Kercher Theatre School is required to collect and manage certain data. We need to know information regarding students' name, date of birth, address, contact number, email address, medical history, previous injuries and allergies – if the student does not have a phone number or email address – we ask for a Parent/Guardian's details on this. We also request for an emergency contact name and phone number. At times throughout the year, this information may be requested by Bucks County Council and other performing council areas; this information is sent to the Local Authority via a secure electronic file transfer system.

We are required to collect certain details of visitors to our school. We need to know visitors' names, telephone numbers, and where appropriate; company name. This is in respect of our Safeguarding Policy and the event of a fire or injury.

When employing staff, Kercher Theatre School is required to hold data on Teachers; name, address, email address, telephone number, date of birth, National Insurance number, photographic ID, *passport or driver's license*, bank details, an up to date Disclosure and Barring Service check (DBS – *formally known as a CRB*), a copy of teaching qualifications, public liability insurance and first aid training. DBS UTR numbers and date of issue are also held on a central staffing record.

Kercher Theatre School is affiliated with examining boards; the ISTD, IDTA, Acrobatic Arts and iD-Company and as such, is required to collect and manage data including student's name, date of birth and address. This information is for examination purposes only.

2. The right of access

An individual is able to make a request relating to their personal information and data that Kercher Theatre School holds at any point. Kercher Theatre School will then provide a response within 4 weeks. Kercher Theatre School can refuse a request, if we have a lawful obligation to retain the data but we will inform the individual of the reasons for the rejection.

3. The right to rectification

An individual can make a request relating to their data held by Kercher Theatre School at any time. Kercher Theatre School will follow all instructions to make sure all information held is accurate and check annually that the information is still correct. If an individual's data, held by Kercher Theatre School is requested and the individual notices a discrepancy with their information, Kercher Theatre School will alter the data and re-send it back to the individual (within 1 week) to check thoroughly that all information is correct and accurate. We do request that any updated information that an individual has must be submitted to us as and when it happens.

4. The right to erasure

Individuals have the right to request their personal information and data being deleted where there is no compelling reason for its continued use.

Kercher Theatre School has a legal duty to keep data records of our students, parents and guardians' details for a reasonable time, accidental and injury records kept for 19 years (or until the student reaches 21 years), and 22 years (or until the student reaches 24 years) for Child Protection records. Staff records must be kept for 6 years after terminating their contract before they can be erased. This data is archived securely onsite and shredded after the legal retention period.

5. The right to restrict processing

Parents, visitors and staff can object to Kercher Theatre School processing their data. This means that records can be stored but must not be used in any way, for example for reports, communications or publicity/promotion etc.

6. The right to data portability

Kercher Theatre School may require for data to be transferred from one IT system to another; such as from Kercher Theatre School to the Local Authority, for performance licenses and dance associations for examinations. These recipients use secure file transfer systems and have their own policy procedures in place in relation to GDPR.

7. The right to object

Parents, visitors, volunteers and staff have the right to object to their data being used for certain activities like marketing or research.

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

Automated decisions and profiling are used for marketing based organisations. Kercher Theatre School does not use personal data for such purposes.

Storage and use of Personal Information

Kercher Theatre School keeps all paper copies of students and staff records in a locked filing cabinet, and all electronic copies of students and staff records on a protected internet-based system. Members of staff can gain access to these files, however, any information taken from files about our students is confidential. These records remain on site at all times. Paper records are shredded after the retention period.

Access to company computers are all password protected. When a member of staff leaves Kercher Theatre School, all passwords associated with the company are changed in line with this policy and our safeguarding policy. All external hard drives are also password protected for extra protection.

Information regarding individual students for weekly registers, medical information and emergency contact details are kept on a password protected database system. These documents include data such as student's names, date of birth, phone numbers and email addresses. These records are deleted after the relevant retention period.

Kercher Theatre School stores personal data held visually in photographs and video clips; unless written consent has been obtained via the Photography Release Form. Our Photography Release Forms do state the Right to Erasure. Video footage will be kept as archives for choreographic purposes. In the event that an individual requests for the Right to Erasure, Kercher Theatre School will keep video footage but not expose to anyone as the choreography remains the property of Kercher Theatre School and the Choreographers. The files will not be passed on, or shown to anyone other than Kercher Theatre School and the choreographer. No names are stored with images or included with any social media sites, on the website or on visual display.

Due to the Coronavirus pandemic, full names and contact numbers may be given to the government for Test and Trace, should anyone come into contact with another person who has tested positive with the virus.

Policy Review Date: April 2022