

Data Protection and GDPR Policy

April 2024

Florian School of Dance is committed to protecting the rights and freedoms of individuals with respect to the processing the personal data of our students, parents, carers, self-employed teachers, visitors, and volunteers. This policy sets out procedures for the use, storage and access to this confidential information.

Principal, Emma Emmerson, is the registered Information Officer for Florian School of Dance and is happy to receive any questions regarding the collection and storage of your data.

What, how and why we collect, store and use your personal information

As a dance education provider, Florian School of Dance needs students, parents, carers full names, addresses, telephone numbers, email addresses, important medical information, relevant SEND information and emergency contact details including names, relationship to student and mobile numbers.

Visitors will need to provide names and telephone numbers in line with our Health and Safety and Child and Vulnerable Adults at Risk Protection Policies. Volunteers and chaperones for shows, excursions and events may be required to hold up to date Disclosure and Barring checks (DBS).

Data is held for any teachers working at Florian School of Dance including full names, addresses, email addresses, mobile numbers, relevant qualifications and certificates, bank details for payment and Disclosure Barring Service checks (DBS). Date of birth, National Insurance Numbers, photographic ID and proof of eligibility to work in the UK may also be required. DBS numbers and date of issue are also held securely.

Under GDPR guidelines, the sensitive data, referred to as Special Category Data required to be obtained, includes, but is not limited to health and medical information and accident report forms. This information is required for the safety of students participating in dance classes, events and excursions. This information will be shared with relevant teachers if there is a legitimate interest in sharing this information, for example, where personal medical plans are in place.

Florian School of Dance obtains all personal data under the lawful basis of Legitimate Interest. It is necessary to collect personal details of students and details of parents and carers of those students under the age of 18 for their protection and safety whilst in the care of Florian School of Dance. The legal basis for processing data will be identified and documented. The processing of data may be undertaken by Florian School of Dance staff and chaperones, where the sharing of personal or sensitive data has been consented to and complies with GDPR.

Personal information will be used for:

- Registers to monitor attendance and for health and safety and safeguarding reasons.
- RAD and ISTD exam entries and for some dance events and excursions
- For invoicing termly
- Communication with existing customers (by consent) through the termly e-newsletters, school emails and letters for exams.

Personal information, photographs and videos of students dance work may be used by for the purposes of advertising events, services, news, but also for training and choreography. This may be through means of email, website or social media (by consent). Specific consent is required to give us permission to take and use photographs/videos/names of individuals participating in classes, performances, workshops, events for advertising, marketing and promotional purposes. Consent will also give permission for the release of photographs/videos to be sold to parents/students as mementos of shows.

Anybody teaching for Florian School of Dance who requires to obtain any relevant data about any student will be required to read this Data Protection Policy and agree to sign a Data Processing Form to demonstrate their understanding of their responsibility and to agree to their obligations.

Florian School of Dance uses Cookies on its website www.floriandance.com to collect data for Google Analytics. This data is anonymous.

The Right of Access

Individuals have the right to access your personal data at any time. You have the right to ask for data to be updated, removed, or erased and if requested, this will be actioned as quickly as possible (within the legal requirement of 30 days), provided that there are no legal reasons preventing us from doing so. Please note that certain information must be retained for differing periods of time (e.g. accident books, child protection records, staff records). It is ultimately the responsibility of the individual to notify us of any changes to your personal or sensitive data and this can be done at any time via emailing florianschoolofdance@outlook.com or by completing a new Registration Form.

Florian School of Dance will at times require certain personal and sensitive data to be transferred to GDPR compliant third parties. This includes but is not limited to performance organisers, insurance companies, uniform and costume providers,

examination boards, HMRC, local authorities in instance of obtaining chaperone and other performance related licences.

Information may be shared with a third party without consent where:

- there is a perceived risk to life; or
- there is perceived likelihood of harm.
- there is a statutory requirement. We have a duty to inform Social Services and/or the Police if we believe someone is being neglected or abused, or at immediate risk of harm resulting from neglect or abuse.

Teachers may at times be required to access or process data. Copies of this Data Protection and GDPR Policy must be read, understood and signed by all self-employed teachers. Staff will make every effort to keep data secure when they are in possession of it and by storing data in lockable filing cabinets or with the use of strong passwords on phones and computers. Teachers are also data subjects and as individuals are required to consent to the retention and use of their personal data for their employment. They have the right to obtain, update, remove or erase any information held by Florian School of Dance about themselves as they so wish.

Firewall and virus checking software will be installed on computers owned by Florian School of Dance to keep them protected as far as is possible. Mobile phones with internet access must also be regularly updated and protected with passwords. Regular back-ups of information must be made by Florian School of Dance so that the loss of a computer does not mean a loss of all information. All personal data will be securely removed from old computers before they are disposed of.

Emails will only be sent only to the intended recipient and emails will be sent using (BCC) blind carbon copy when sending to more than one recipient. Any paper waste containing sensitive and confidential information will be shredded after use.

In the unlikely event of a data breach, Emma Emmerson will inform individuals and contact the Information Commissioners Office (ICO) within 72 hours of the breach being realised. We will work quickly with the necessary bodies to resolve the problem.

Consent

No data will be processed until consent has been obtained. Consent is given through the completion and signing of a Registration Form. This is how all necessary personal and sensitive data is obtained by Florian School of Dance.

Formal consent is required through the completion and signing of these forms. Paper and electronic copies of these forms will be stored securely for appropriate lengths of times and reviewed at least annually or as required.

Parental consent is required for any child under the age of 18. Withdrawal of consent should be sent in writing to the principal Emma Emmerson at florianschoolofdance@outlook.com