General Data Protection Regulation Policy

**Statement –** Spotlite Dance will never share information about individuals or families without their permission.

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection.

It was approved by the EU Parliament in 2016 and comes into effect on 25th May 2018.

GDPR states that personal data should be ‘processed fairly & lawfully’ and ‘collected for specified, explicit and legitimate purposes’ and that individuals data is not processed without their knowledge and are only processed with their ‘explicit’ consent. GDPR covers personal data relating to individuals. Spotlite Dance is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors 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

Spotlite Dance is a registered dance school with the DTF, ISTD, RAD and All England Dance and as so, is required to collect and manage certain data. We need to know parent’s names, addresses, telephone numbers, email addresses. We need to know children’s’ full names, addresses, date of birth and Education school, along with any SEN requirements. We are requested to provide this data to Surrey Heath County Council, and Hampshire County Council and any other performing council areas within our catchments; 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 Stage Schools. We need to know visits names, telephone numbers, and where appropriate company name. This is in respect of our Health and Safety and Safeguarding Policies.

As an employer Spotlite Dance is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, photographic ID such as passport and driver’s license, bank details. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK.

This is required for processing of DBS checks. DBS Numbers and date of issue are also held on a central staffing record.

2) The right of access

At any point an individual can make a request relating to their data and Spotlite Dance will need to provide a response (within 1 month). Spotlite Dance can refuse a request, if we have a lawful obligation to retain data but we will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision.

3) The right to erasure

You have the right to request the deletion of your data where there is no compelling reason for its continued use. However Spotlite Dance has a legal duty to keep children’s and parents details for a reasonable time\*, Spotlite Dance retain these records for 1 year after leaving school, children's accident and injury records for 19 years (or until the child reaches 21 years), and 22 years (or until the child reaches 24 years) for Child Protection records. Staff records must be kept for 6 years after the member of leaves employment, before they can be erased. This data is archived securely onsite and shredded after the legal retention period.

4) The right to restrict processing

Parents, visitors and staff can object to Spotlite Dance processing their data. This means that records can be stored but must not be used in any way, for example examination applications, reports or for communications.

5) The right to data portability

Spotlite Dance requires data to be transferred from one IT system to another; such as from Spotlite Dance to the Local Authority, for performance BOPA licences, and dance associations for examinations. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

6) The right to object

Parents, visitors 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. Spotlite Dance does not use personal data for such purposes.

**Storage and use of personal information**

All paper copies of children's and staff records are kept in a locked file at the Principals home address. Members of staff can have access to these files but information taken from the files about individual children is confidential and apart from archiving, these records remain on site at all times. These records are shredded after the retention period.

Information about individual children is used in certain documents, such as, a weekly register, medication forms. These documents include data such as children's names, date of birth and an emergency contact number but no addresses. These records are shredded after the relevant retention period.

Spotlite Dance collects a large amount of personal data every year including; names and addresses of those on the waiting list. These records are shredded or deleted if the child does not attend or added to the child’s file and stored appropriately.

Footlight Performance Academy stores personal data held visually in photographs or video clips or as sound recordings, No names are stored with images in photo albums, displays, on the website or on Spotlite Dance social media sites.

Access to the Spotlite computer is password protected, this password is only known to the principal. Any portable data storage used to store personal data, e.g. Mobile phone, tablet, is password protected and with the principal at all times.

GDPR means that Spotlite Dance must;
\* Manage and process personal data properly
\* Protect the individual’s rights to privacy
\* Provide an individual with access to all personal information held on them.

This Policy was created April 2018

 Policy review date: April 2019