



GENERAL DATA PROTECTION REGULATIONS (GDPR) POLICY

Definitions

- Personal Data – Info that can identify a person directly or indirectly (this includes photographs)
- Processing – Anything we do with data – including just looking at it
- Special Category Data – includes but is not limited to information regarding, race, health, genetic, political and religious views, sexual orientation etc.

THE COMMITTEE IS:

- Mrs. Lisa Mallon – Data Protection Officer
- Mr. Shane Broderick
- Mr Chris Eaton
- Mrs. Sally Eaton
- Mrs Carla Santos

THE DATA WE KEEP

- Personal information on members of staff – source – application form.
- Financial details for members of staff – bank details, payments made – source – application pack and payroll system.
- Basic information regarding parents and guardians, e-mail address and phone number – source – application form.
- Information regarding the children in our care, including names, guardians, next of kin, age, sex, dietary restrictions, medical information, developmental stages and abilities.
- Photographs of children.
- The retention period for the information is 7 years, for both customers and employees.
- The data is kept electronically as files stored on the computers of the organisation management. Paper copies are held in locked filing cabinets or securely by the Head of the Music Academy. No data is held in any other location.

LAWFUL BASIS FOR KEEPING DATA

- The lawful basis for keeping data on individuals, both parents / guardians and children is in order to provide care and education services for the individuals in question.
- The lawful basis for keeping information on employees or ex-employees is in order to pay them correctly and comply with all relevant employment law.

PRIVACY POLICY

- Only Directors, Head of Finance Operations, HR Manager and Head of Business Operations have access to any personal and financial information on members of staff.
- Personnel files are kept in a locked filing cabinet in a locked office that only our HR Manager and Head of Business Operations have access to.

- Information on employees is kept in a secure place for 7 years after employment ends. This can take the form of paper in a locked drawer which is stored in a locked archive area and electronic information in a password protected system.
- Information on parents / guardians is held on the office computers and accessed by approved users only. These computers are password protected.
- Information regarding children is necessarily available to all members of staff who have care responsibilities for the children. This is considered vital for the safety of the children concerned.

CONSENT

- It is accepted that parents / guardians have given consent by completing the forms associated with application and registration, and employees have given consent by completing an application form. The lawful basis for keeping the information stems from the fact that the clients and employees have completed the forms and provided us with the information.
- However, whilst it is recognised that the information we hold on customers and employees is freely given and therefore that consent is implied, we must gain specific consent.
- Both employees, ex-employees and parents / guardians have the right to complain directly to the Information Commissioners Office (ICO) if they have any concerns.

PHOTOGRAPHS

- Photographs of children are obtained and kept for three reasons, firstly to identify children for whom dietary restrictions apply or who have medical conditions, secondly for displays around the school that inform parents and guardians of activities the children have been involved with and lastly, for promotion purposes.
- It is considered lawful, prudent and reasonable for the photographs to be stored and used unless parents / guardians have withdrawn their consent in writing.
- Consent to use images can be withdrawn by notifying the Music Academy in writing at any time and this will be duly noted, filed and adhered to.

DATA BREACHES

- If any data breaches are discovered that are likely to result in a risk to individual's rights and freedoms, then the ICO and the individual concerned will be notified immediately.
- An ongoing record will be kept of any data breaches and the rectifying action taken. This will include an impact assessment and a discussion regarding compensation if appropriate.

RISK

- When considering the obtaining and storage of information the company will have due regard to the impact or consequences of a data breach on an individual (the principle of proportionality is embedded in the EU directive).

ACCESS

- If we receive any request from individuals or organisations regarding information we hold on them or their organisation, full disclosure will be provided to them in line with statutory regulations.
- Any changes to the data requested by an employee, ex-employee or parent / guardian will be considered and any necessary rectifications made in line with statutory regulations.
- If a request is refused the school will provide full reasons, and the individual will have the right to pursue the matter with the ICO.

COMMUNICATION AND TRAINING

- Langley Hall Music Academy recognise the importance of ensuring that all members of staff are aware of the obligations of the company with regard to the GDPR. This policy document has been made available to all staff.

REVIEW AND MONITORING

- This document and the whole data protection performance of the company will be reviewed annually by the personnel name in section 1.

ACTIONS FOLLOWING REVIEW

- Following each review there will be an action plan if required.

This policy was prepared on 1st February 2021

Review due: 1st February 2022