



# The Children's Music School

## Data Protection Policy

### 1. Data Protection Principles

The Children's Music School is committed to processing data in accordance with its responsibilities under the GDPR (General Data Protection Regulation).

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### 2. General Provisions

- a. This policy applies to all personal data processed by The Children's Music School.
- b. The responsible person (Fiona McSorley) shall take responsibility for the ongoing compliance of this policy.

- c. The responsible person shall ensure that relevant personnel are made aware of our data audit map for particular areas of business.
- d. This policy shall be reviewed annually.

### **3. Customer Data**

- a. To process a customer booking, we need to collect personal details about you and your children. We will treat it as confidential and keep it secure, complying with all relevant UK legislation.
- b. We will use your e mail address and telephone number to contact you with information that relates to any bookings that you make and any information that we might need that relates to the welfare of your child.
- c. We would also like to use some of you details to inform you about any upcoming events or relevant resources that may be of use/interest. We will ask you about your consent during the registration/booking process and you can unsubscribe at any time.

### **4. Lawful, fair and transparent processing**

- a. We only ask for information that is necessary in order for us to operate.
- b. Our registration system will not retain customer information for longer than is necessary.
- c. Individuals have the right to access their personal data and any such requests made shall be dealt with in a timely manner.
- d. Any customer or staff member, who considers that this policy has not been followed in respect of personal data about themselves should raise the matter with the person responsible (Fiona McSorley). If the matter is not resolved it should be raised as a formal grievance.

### **5. Lawful purposes**

- a. All data processed by The Children's Music School must be done on one of the following lawful bases; consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt in consent shall be kept with the personal data on our password protected registration site. Customers can unsubscribe at any time via e mail to: [childrensmusic@zen.co.uk](mailto:childrensmusic@zen.co.uk).
- c. Our customers will only receive future event marketing if they have opted in to do so.

## 6. Staff Data Awareness and Accuracy

- a. We will ensure that personal data is adequate, accurate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- b. Our staff are responsible for:
  - I. Checking that any information that they provide to the Children's Music School in connection with their employment is accurate and up to date.
  - II. Informing The Children's Music School of any changes that occur to the information they provide, i.e. change of address or name.
  - III. Submitting accurate information to our GDPR compliant Disclosure and Barring Service (DBS) provider.

## 7. Data Collection, retention, Archiving/Removal

To ensure that personal data is kept for no longer than necessary, the registration system will have an archiving policy for each area in which personal data is processed and review this policy annually.

### **Staff**

Names, addresses, email, contact phone, date of birth.

Information is kept for the duration of working with the Children's Music School + 2 years. This is for the purpose of communicating work related information and safeguarding.

**DBS** information: This is kept for the duration of working with The Children's Music School + 2 Years for the purpose of safeguarding and archiving.

### **Customers**

Names, addresses, contact details and other booking information

Information is kept as long as their child is eligible for our programmes + 2 years.

Customers can freely opt-out of, or update or delete their profile.

This is for the purpose of booking, safeguarding and operational purposes.

All information is kept on a secure, password protected system.

## 8. Data Security

- a. All staff are responsible for ensuring that:
- b. Any personal data which they hold is kept securely.
- c. Personal information is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.
- d. Staff should note that unauthorised disclosure and/or failure to adhere to the requirements set out below will usually be a disciplinary matter and may be considered gross misconduct in some cases.

- e. Personal information should be: kept in a locked filing cabinet, or in a locked drawer; or if it is computerised, be password protected; or when in transit on portable media the files themselves must be password protected.
- f. Data stored on portable electronic devices or removable media is the responsibility of this individual to ensure that:
  - I. Suitable back-ups of the data exist
  - II. Sensitive data is appropriately encrypted.
  - III. Electronic devices such as laptops, mobile devices and computer media that contain sensitive data are not left unattended.
- g. The Children's Music School will ensure that personal data is stored securely using modern
- h. software that is kept up-to-date.
- i. Access to personal data shall be limited to personnel who need access, and appropriate
  - a. security is in place to avoid unauthorised sharing of information.
- j. When personal data is deleted this should be done safely such that the data is irrecoverable.
- k. Appropriate back-up and disaster solutions shall be in place

## 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data The Children's Music School will promptly assess the risk to people's rights and freedoms.

*Reviewed by:*

## Your rights

Under current legislation, data Subjects have the following rights:

- **To be informed:** This policy is one of the ways in which The Children's Music School informs you how and why we process your data.
- **Of access:** All Data Subjects have the right to request access to all of the data we hold on them. Any Data subject requests received will be reviewed and responded to within one calendar month of receipt of request. Most requests will be fulfilled free of charge, but The Children's Music School reserves the right to charge a reasonable fee for any requests deemed to be excessive, unfounded or repetitive.

- **Of rectification:** Should you find that any data we hold about you is incorrect, you can ask us to correct it and we will investigate and respond within one calendar month of receipt of the request.
- **Of erasure:** You can ask for your personal data to be erased permanently. All such requests will be responded to within one calendar month of the receipt of a request. Please note that whilst we will always endeavour to fulfil requests, there may be some instances where this is not possible due to legal or regulatory reasons. We will always provide a full explanation in any such instances.
- **To restrict processing:** If you do not wish for your data to be erased, you may ask for it to be restricted so that we continue to hold it but not process it or use it in any way – we would essentially ‘archive’ your data. This is only applicable in certain circumstances, however we will look at all requests and respond within one calendar month of the receipt of a request.
- **To data portability:** All electronically held data can be transferred to another company in a structured commonly used and machine-readable format on request. Please note that this will only include the data you have provided to us and not any ancillary data produced as a result of the services we have created during the provision of our services or where the data includes information regarding a third party. All requests for moving data will be responded to within one calendar month of a request being received.
- **To object:** You can object to your processing data for the purposes of marketing, scientific/historical research and statistics, or legitimate interests or in the performing of a task in the public interest/exercise of official authority (including profiling) All such requests shall be responded to within one calendar month.
- **To complain:** You have the right to raise a complaint regarding the processing of your data or our response to a request under the above rights. As part of this you also have the right to escalate your complaint to a supervisory authority. In respect of data handling, you have the right to escalate your complaint to the Information Commissioners Office (ICO)

Data subjects have the right to withdraw their consent to our processing their data at any time.

In respect of any of the rights indicated above, if you would like to make a request, require further information, or have a complaint regarding our processing of your data please contact us by email at: [childrensmusic@zen.co.uk](mailto:childrensmusic@zen.co.uk) or by phone at: **020 8466 7468**

*August 2022*