



GENERAL DATA PROTECTION REGULATION POLICY

Statement

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection directives that were in place. 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. Top Hat Theatre School 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

Top Hat Theatre School is a registered Performing Arts provider with various bodies: ISTD (Imperial Society of Teachers of Dance), LAMDA (London Academy of Music & Dramatic Arts), Actobatic Arts, BBTSA (British Baton Twirling Sport Association), 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, dates of birth and Education school, along with any medical, SEN requirements and ethnicity (for equal opportunities purposes). We are requested to provide data to the above mentioned bodies for the purposes of examinations, gradings and competitions. We are also required to provide data to Northamptonshire County Council for performance licensing purposes & other performing council areas as necessary; this information is sent to the Local Authority via a secure electronic file transfer system. If students are entering festivals or competitions, we are also required to provide data of competitors to festival/competition organisers.

Top Hat Theatre School is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, dates of birth, National Insurance numbers, photographic ID such as passport or driver's licence, bank details. This information is also required for Disclosure and Barring Service



checks (DBS) and proof of eligibility to work in the UK. DBS Numbers and date of issue are also held on a central record.

For performances, we are required to ensure we have allocated Licensed Chaperones – we collect names, email addresses, telephone numbers, DBS certificate numbers and Chaperone Licence numbers which we store centrally electronically and are also requested to pass some information to Local Authorities for licensing and compliance purposes.

Top Hat Theatre School uses Cookies on its website to collect data for Google Analytics, this data is anonymous.

2) The right of access

At any point an individual can make a request relating to their data and Top Hat Theatre School will need to provide a response (within 1 month). Top Hat Theatre School 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, Top Hat Theatre School has a legal duty to keep children's and parents details for a reasonable time, Top Hat Theatre School retain these records for 3 years after leaving, 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 staff leaves employment, before they can be erased. This data is archived securely onsite and shredded after the legal retention period or stored electronically on devices with security password protection.

4) The right to restrict processing

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



5) The right to data portability

Top Hat Theatre School requires data to be transferred from one IT system to another; such as from Top Hat Theatre School 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. Top Hat Theatre School 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 office at Top Hat Studios. 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 is gathered via and stored electronically on DanceBiz, Jotform and Google Forms, all of which are GDPR compliant software. Members of staff have access to information stored on DanceBiz via various devices, all of which are data protected and with individual passcodes. Information stored about individual children is confidential and used by teachers for the purpose of class registers, medical information and emergency contact details.

Top Hat Theatre School collects a large amount of personal data every year including; names and email addresses of those on the waiting list. These records are deleted if the child does not attend or added to the child's file and stored appropriately.

Information regarding families' involvement with other agencies is stored both electronically (password protected) and in paper format, this information is kept in a locked office at Top Hat Theatre Studios. These records are shredded after the relevant retention period.



Top Hat Theatre School stores personal data held visually in photographs or video clips or as sound recordings. These will only be published if consent has been obtained via the Photo/Video release form. No full names are stored with images in photo albums, on the website or on Top Hat Theatre School's social media sites.

Access to office computers and mobile devices are password protected. When a member of staff leaves the company, these passwords are changed in line with this policy and our Safeguarding policy.

GDPR means that Top Hat Theatre School 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 by Top Hat Theatre School May 2018.

Signed on behalf of Top Hat Theatre School

PP  Julie McKenna (Principal)

Policy review date: April 2018