



Data Protection Policy

Policy Owner: Principal / Proprietor

Applies to: Students, parents/carers, staff, teachers, volunteers, customers, visitors and other individuals whose personal information is processed by Top Hat Theatre School

Effective Date: September 2026

Review Date: September 2027

1. POLICY STATEMENT

Top Hat Theatre School is committed to protecting the privacy and personal information of students, parents, carers, staff, teachers, volunteers, customers and other individuals with whom we have a relationship.

We recognise that we have a responsibility to handle personal information **fairly, lawfully, securely and transparently**.

Top Hat Theatre School will comply with applicable UK data protection legislation, including the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, as amended from time to time.

We will only collect and use personal information where there is a legitimate and appropriate reason to do so and will take reasonable steps to keep information accurate, secure and confidential.

2. WHO THIS POLICY APPLIES TO

This policy applies to personal information relating to:

- students and prospective students;
- parents and carers;
- staff and teachers;
- volunteers and visiting professionals;
- customers and workshop participants;
- suppliers and contractors;
- visitors; and

- other individuals who communicate or interact with Top Hat Theatre School.
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3. WHAT IS PERSONAL DATA?

Personal data is information that relates to an identified or identifiable individual.

Depending on the circumstances, Top Hat may process information such as:

- names;
- addresses;
- telephone numbers;
- email addresses;
- dates of birth;
- emergency contact details;
- parent/carer information;
- attendance records;
- class and timetable information;
- examination information;
- photographs and video recordings;
- performance and competition information;
- payment and financial information;
- medical information;
- allergy and dietary information;
- additional support requirements;
- safeguarding information; and
- staff employment and qualification information.

Some information, such as health or safeguarding information, is particularly sensitive and will be handled with additional care.

4. HOW WE COLLECT INFORMATION

Information may be collected:

- when a student applies or enrolls;
- through registration forms;
- through online forms or school systems;
- from parents or carers;

- directly from students where appropriate;
- from staff and teachers;
- during classes and activities;
- during examinations, festivals and competitions;
- when purchasing workshops or other services;
- through correspondence with the school;
- through photographs or filming at school activities; and
- from third parties where there is a legitimate reason for doing so.

Where information is obtained from someone other than the individual concerned, Top Hat will consider its transparency obligations and provide appropriate privacy information.

5. WHY WE USE PERSONAL INFORMATION

Top Hat may use personal information for purposes including:

Administration

- managing enrolments;
- maintaining student records;
- managing timetables and classes;
- contacting parents and carers;
- processing payments;
- managing bookings and workshops; and
- maintaining appropriate school records.

Student welfare and safety

- emergency contacts;
- medical and allergy information;
- safeguarding;
- health and safety;
- accident and incident management;
- appropriate supervision; and
- responding to welfare concerns.

Teaching and performing arts

- class planning;
- examination entries;
- festival and competition entries;

- performance arrangements;
- costumes and uniform;
- trips and external activities; and
- recording student progress.

Communication

- sending information about classes;
- communicating changes or cancellations;
- providing school updates;
- communicating about performances and events; and
- sending relevant school information.

Marketing and publicity

Where appropriate permissions and a lawful basis exist, photographs, videos and other information may be used to promote Top Hat Theatre School, including through:

- the school website;
- social media;
- promotional materials;
- programmes;
- publicity materials; and
- other school-related communications.

6. LAWFUL PROCESSING

Top Hat will only process personal information where there is an appropriate lawful basis under data protection legislation.

Depending on the circumstances, this may include:

- **contract** – where information is required to provide the agreed service;
- **legal obligation** – where the law requires Top Hat to retain or provide information;
- **legitimate interests** – where Top Hat has a legitimate business or operational need to use information and this does not override the individual's rights;
- **consent** – where consent is the appropriate lawful basis; and
- other lawful bases applicable under data protection legislation.

Consent will not be used as a substitute where another lawful basis is more appropriate.

Where consent is relied upon, it can be withdrawn, although this does not affect processing that took place before consent was withdrawn.

7. CHILDREN & YOUNG PEOPLE

Top Hat works primarily with children and young people and recognises that children's personal information requires particular care.

The ICO states that children have data protection rights in their own right and that organisations should consider children's age, understanding and capacity when dealing with their information.

Top Hat will therefore:

- collect only information that is reasonably required;
- consider the best interests and welfare of children when processing their information;
- explain the use of information in clear and understandable language;
- take appropriate steps to protect children's information;
- avoid unnecessary sharing of children's personal information;
- ensure that photographs and videos are handled appropriately;
- consider children's privacy when using online systems; and
- respect children's data protection rights as appropriate to their age and understanding.

Parents/carers will normally provide information and exercise rights on behalf of younger children where appropriate. However, Top Hat recognises that children may have their own rights and capacity in relation to their personal information.

8. MEDICAL & SPECIAL CATEGORY INFORMATION

Top Hat may need to collect information relating to:

- medical conditions;
- allergies;
- medication;
- injuries;
- disabilities;

- dietary requirements; and
- other health or welfare information.

This information is collected where it is necessary to help keep a student safe, provide appropriate support or meet another lawful requirement.

Access to sensitive information will be limited to people who reasonably need it for their role.

Medical information will not be disclosed unnecessarily.

9. SAFEGUARDING INFORMATION

Safeguarding information is treated as highly confidential.

However, confidentiality does **not** prevent Top Hat from sharing information where it is necessary to safeguard a child or another person.

Information may need to be shared with appropriate safeguarding professionals, emergency services, parents/carers or other relevant authorities where there is a lawful and appropriate reason to do so.

Safeguarding information will be handled in accordance with the **Safeguarding & Child Protection Policy**.

10. PHOTOGRAPHY & FILMING

Top Hat regularly photographs and films classes, rehearsals, performances, competitions and other activities.

Photographs and video may be used for legitimate school purposes, including:

- recording school activities;
- celebrating student achievements;
- creating performance records;
- school publicity;
- social media;
- website content; and
- promotional materials.

Where consent is the appropriate lawful basis, the school will seek the relevant consent before using images for the purposes covered by that consent.

Parents/carers and students should understand that material published online may be copied or shared by others and that Top Hat cannot guarantee control over material once it has been lawfully published.

Top Hat will take reasonable steps to avoid unnecessarily identifying children in publicly shared material.

11. SOCIAL MEDIA

Top Hat may use social media to communicate with families, celebrate achievements and promote the school.

Personal information will only be shared through social media where there is an appropriate lawful basis and the content is consistent with any relevant permissions.

Staff, students and parents/carers must not use social media to disclose confidential information about other students or families.

Any concerns regarding social media should be raised with the Principal rather than discussed publicly.

12. WHO WE MAY SHARE INFORMATION WITH

Top Hat will only share personal information where there is a lawful and appropriate reason.

Depending on the circumstances, information may be shared with:

- teachers and staff who require it for their role;
- examination organisations;
- festival and competition organisers;
- performance venues;
- professional photographers or videographers;
- relevant insurers;
- professional advisers;
- payment providers;

- IT and software providers;
- parents/carers where appropriate;
- emergency services;
- safeguarding professionals;
- regulatory or statutory authorities; and
- other organisations where sharing is necessary and lawful.

Top Hat will not sell personal information to third parties.

13. THIRD-PARTY SERVICE PROVIDERS

Top Hat may use external providers to support its operations, such as:

- payment systems;
- booking or administration software;
- email systems;
- website providers;
- cloud storage;
- accounting services;
- IT services; and
- other business systems.

Where a third party processes personal information on behalf of Top Hat, appropriate contractual and security arrangements will be considered and maintained.

14. INTERNATIONAL DATA TRANSFERS

Some online services or technology providers used by Top Hat may process information outside the United Kingdom.

Where this occurs, Top Hat will take reasonable steps to ensure that any international transfer is carried out in accordance with applicable data protection requirements.

15. DATA SECURITY

Top Hat will take appropriate technical and organisational measures to protect personal information against:

- unauthorised access;
- accidental loss;
- theft;
- inappropriate disclosure;
- alteration;
- destruction; and
- other forms of misuse.

Measures may include:

- password protection;
- restricted access;
- secure storage;
- appropriate staff access controls;
- secure disposal of records; and
- staff awareness and training.

No method of electronic storage or transmission can be guaranteed to be completely secure. However, Top Hat will take reasonable and proportionate steps to protect the information it holds.

16. STAFF RESPONSIBILITIES

Anyone working for Top Hat who handles personal information must:

- keep information confidential;
- only access information required for their role;
- not share passwords;
- use appropriate communication channels;
- take care when sending emails or documents;
- avoid discussing confidential information where it can be overheard;
- report suspected data breaches promptly; and
- comply with this policy and relevant school procedures.

Personal information must not be copied, downloaded or retained unnecessarily.

17. EMAIL & COMMUNICATION

Staff should take particular care when communicating personal information by email or messaging services.

Before sending sensitive information, staff should check:

- the recipient;
- the information being sent;
- whether the recipient is authorised to receive it; and
- whether a more secure method should be used.

Where an email is sent to multiple families, appropriate measures such as **BCC** should be used where recipients should not see one another's email addresses.

18. DATA RETENTION

Top Hat will not retain personal information indefinitely.

Information will normally be retained only for as long as it is reasonably necessary for the purpose for which it was collected, or where there is a legal, accounting, safeguarding or other legitimate requirement to retain it.

Retention periods will vary depending on the type of information.

When information is no longer required, it will be securely deleted, destroyed or otherwise disposed of.

19. ACCURACY

Top Hat will take reasonable steps to ensure that personal information is accurate and up to date.

Parents/carers and staff should inform the school of relevant changes, including:

- address;
- telephone number;

- emergency contact;
 - medical information;
 - allergies;
 - relevant support needs; or
 - other information that may affect a student's safety or administration.
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20. DATA PROTECTION RIGHTS

Individuals have rights under data protection law, subject to applicable conditions and exemptions.

These may include the right to:

- be informed about how their information is used;
- access personal information;
- request correction of inaccurate information;
- request erasure in certain circumstances;
- request restriction of processing in certain circumstances;
- object to certain processing;
- request data portability where applicable; and
- withdraw consent where consent is the lawful basis.

Not all rights apply in every situation and there are circumstances where Top Hat may be legally entitled or required to retain or process information.

21. SUBJECT ACCESS REQUESTS

An individual may request access to the personal information Top Hat holds about them.

Requests should be made in writing to:

Julie McKenna

Principal / Proprietor

Top Hat Theatre School

Unit 4 Dallington Fields Business Park

Northampton

NN5 7QD

Email: julie@tophattheatreschool.co.uk

Top Hat will deal with requests in accordance with applicable data protection legislation.

Where a request is made on behalf of another person, including a child, Top Hat may need to establish the requester's identity, authority and relationship with the individual concerned.

22. CHILDREN'S REQUESTS

Children have data protection rights in their own right.

Top Hat will consider the child's age, maturity and understanding when responding to requests concerning their personal information.

Where appropriate, Top Hat may communicate directly with a young person as well as their parent/carer.

The fact that a parent or carer has parental responsibility does not automatically mean they are entitled to all of a child's personal information in every circumstance.

23. DATA BREACHES

A data breach may include:

- sending information to the wrong person;
- losing a device containing personal information;
- unauthorised access;
- accidental disclosure;
- theft of records;
- inappropriate sharing of information; or
- a cyber security incident.

Any suspected or actual data breach must be reported to the Principal **as soon as possible**.

Top Hat will assess the incident and take appropriate action, including considering whether notification to the Information Commissioner's Office or affected individuals is required.

24. COMPLAINTS ABOUT DATA PROTECTION

Anyone who has concerns about the way Top Hat handles their personal information should contact:

Julie McKenna, Principal / Proprietor

Top Hat Theatre School

Unit 4 Dallington Fields Business Park

Northampton

NN5 7QD

Email: julie@tophattheatreschool.co.uk

Top Hat will investigate complaints fairly and appropriately.

Individuals also have the right to raise concerns with the **Information Commissioner's Office (ICO)** where they believe their personal information has not been handled appropriately.

[Information Commissioner's Office \(ICO\)](#)

25. DATA PROTECTION & SAFEGUARDING

Data protection must not be used as a reason to prevent appropriate safeguarding information from being shared.

Where there is a genuine safeguarding concern, information may need to be shared with appropriate professionals even where this means overriding normal expectations of confidentiality.

Any sharing will be considered carefully and should be:

- lawful;
 - necessary;
 - proportionate; and
 - limited to the information required.
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26. TRAINING & AWARENESS

Top Hat will ensure that staff and teachers who handle personal information understand their responsibilities.

Relevant staff will be made aware of:

- confidentiality;
 - secure handling of information;
 - safeguarding information;
 - data breaches;
 - appropriate communication; and
 - their responsibilities under this policy.
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27. MONITORING & REVIEW

Top Hat will review its data protection arrangements regularly and will consider:

- changes to legislation and guidance;
- changes to technology;
- new software or service providers;
- changes to the information collected;
- data breaches or incidents; and
- feedback or complaints.

This policy will be reviewed at least annually or sooner where necessary.

28. RELATED POLICIES

This policy should be read alongside:

- **Safeguarding & Child Protection Policy**
 - **Teacher & Staff Code of Conduct**
 - **Customer Complaints Policy**
 - **Rules & Regulations**
 - **Equality, Diversity & Equal Opportunities Policy**
 - **Health & Safety Policy**
 - **Social Media Policy**
 - **Photography & Filming Consent Procedures**
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29. PRIVACY NOTICE

This policy should be supported by a separate **Privacy Notice** provided to parents, students, staff and other individuals when their personal information is collected.

The Privacy Notice should explain, in accessible language:

- what information Top Hat collects;
- why it is collected;
- the lawful basis for processing;
- who information may be shared with;
- how long information is retained;
- individuals' rights; and
- how to raise concerns.

The ICO specifically recommends that privacy information explains what personal information is collected, why it is used, the lawful basis, who it is shared with and how long it is retained.

DECLARATION

Top Hat Theatre School is committed to protecting the privacy, dignity and rights of everyone whose personal information it holds.

We will handle personal information responsibly, securely and transparently and will seek to ensure that students, parents, staff and other individuals understand how their information is used.

Policy Owner: Julie McKenna, Principal / Proprietor

Effective Date: September 2026

Review Date: September 2027

Signed: 

Name/Role: Julie McKenna Company Director

Date: 15.9.2026

Next review: September 2027