

Duet Academy of Dance

DATA PROTECTION POLICY

1. Introduction

Duet Academy of Dance needs to gather and use certain information about its students and their parents or carers. This policy describes how this personal data will be collected, handled and stored to meet data protection standards and the law.

2. Why this policy exists

This data protection policy ensures that Duet Academy of Dance:

- complies with the data protection law and follows good practice
- protects the rights of its students and their parents/carers
- is open about how it stores and processes individuals' data
- protects itself from the risk of data breach.

3. Data Protection Law

The Data Protection Act 2018 describes how Duet Academy of Dance must collect, handle and store personal information. The rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purpose
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than is necessary
6. Be processed in accordance with the rights of individuals
7. Be protected in appropriate ways against accidental loss, destruction or damage
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

4. Policy Scope

This policy applies to Duet Academy of Dance, its students and their parents or carers. It applies to all data Duet holds relating to identifiable individuals, even if that information technically falls outside the Data Protection Act 2018. This can include:

- Name of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Date of birth
- Gender
- Ethnicity

- Name of school student attends
- Emergency contact information
- Dance examinations taken and results achieved
- Health information such as allergies, medical conditions
- Medical information

5. Data Protection Risks

This policy helps to protect Duet Academy of Dance from some very real data security risks, including:

- **Breaches of confidentiality** for instance, information being given out inappropriately
- **Failing to offer choice** for instance, all individuals should be free to choose how Duet uses data relating to them
- **Reputational damage** for instance, Duet could suffer if hackers successfully gained access to sensitive data.

6. Responsibilities

The two principals at Duet Academy of Dance, Sara Shaw and Tracey Platts, have responsibility for ensuring data is collected, stored and handled appropriately. They will ensure that personal data is handled and processed in line with this policy and data protection principles. Their other responsibilities include:

- Ensuring Duet Academy of Dance meets its legal obligations
- Reviewing all data protection procedures and related policies in line with an agreed schedule
- Handling data protection questions from students and their parents or carers
- Dealing with requests from individuals to see data Duet Academy of Dance holds about them (also called 'subject access requests')
- Checking and approving any contracts or agreements with third parties that may handle Duet's sensitive data
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards
- Performing regular checks and scans to ensure security hardware and software is functioning properly
- Evaluating any third party services the company is considering using to store or process data for instance, cloud computing services.
- Approving any data protection statements attached to communications such as emails and or letters
- Addressing any data protection queries from journalists or media outlets like newspapers
- Ensuring marketing initiatives abide by data protection principles.

7. General Guidelines

7.1 The only people able to access data covered by this policy will be the two Duet principals named in 6. above.

7.2 All data will be kept secure, by taking sensible precautions and following the guidelines below.

7.3 Strong passwords will be used and will never be shared.

7.4 Personal data will not be disclosed to unauthorised people, either within Duet Academy of Dance or externally.

7.5 Data will be regularly reviewed and updated if it is found to be out of date. If no longer required, it will be deleted and disposed of.

9. Data Collection

Data is collected from students when a student joins Duet Academy of Dance. Their attendance/absence at lessons is recorded. They are also asked to provide information to the British Theatre Dance Association to enable them to be entered for examinations and are required to either enter this directly online themselves or provide Duet with the information and request that they enter the information for them. A student's parent or carer are required to complete a consent form for their child and a performance licence/exemption form supplied by the local council requesting information about their child to enable them to take part in Duet's annual show. Data is also collected in line with Public Health England requirements for businesses.

10. Data Sharing

Data will only be shared with authorised persons for a specific purpose and with the permission of the student, their parent or carer. Personal data will be shared with the following organisations:

- British Theatre Dance Association for the purposes of entering students for dance examinations and to enable them to gain medals and awards.
- Leicester City Council and Leicestershire County Council for the purposes of child welfare and child licencing as required under The Children (Performances and Activities) (England) Regulations 2014 in relation to taking part in Duet's annual show.
- Public Health England (to include NHS Test and Trace) in relation to COVID-19 reporting.

11. Storage

These rules describe how and where data should be safely stored. When data is stored on paper, it will be kept in a secure place where unauthorised people cannot see it. These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files will be kept in a locked drawer or filing cabinet
- Paper and print outs will not be left where unauthorised people may see them, like on a printer
- Data print out will be shredded and disposed of securely when no longer required.

When data is stored electronically it will be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data will be protected by strong passwords that are changed regularly and never shared.
- If data is stored on removal media (like a memory stick, CD or DVD), these should be kept locked away securely when not being used.
- Data will only be stored on designated drives and servers, and will only be uploaded to an approved cloud computing service.
- Data will be backed up frequently and the back ups will be tested regularly.
- Data will never be saved directly to mobile devices like tablets or smart phones.
- All computers containing data will be protected by approved security software and a firewall.

12. Data Use

It is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, computer screens will always be locked when left unattended.
- Personal data will not be shared informally. It will never be sent by email as this form of communication is not secure.
- Data must be encrypted before being transferred electronically.
- Personal data should never be transferred outside the European Economic Area.

13. Data Accuracy

The law requires Duet Academy of Dance to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data be accurate, the greater the effort Duet Academy of Dance will put into ensuring its accuracy.

It is our responsibility to take reasonable steps to ensure it is kept as accurate and up to date as possible:

- Data will be held in as few places as necessary and will not create any unnecessary additional data sets.
- Every opportunity will be taken to ensure data is updated.
- Duet Academy of Dance will make it easy for data subjects to update the information it holds about them.
- Data will be updated as inaccuracies are discovered.

14. Subject Access Requests

All individuals who are subject of personal data held by Duet Academy of Dance are entitled to:

- Ask what information Duet holds about them and why
- Ask how to gain access to it

- Be informed how to keep it up to date
- Be informed how Duet is meeting its data protection obligations.

If an individual contacts Duet requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at sara.duetacademy@gmail.com. The data controller can supply a standard request form, although individuals do not have to use this.

The data controller will provide the relevant data within one month.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

15. Disclosing data for any other reason

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Duet Academy of Dance will disclose requested data. However, the data controller will ensure the request is legitimate.

13. Providing Information

Duet Academy of Dance aims to ensure that individuals are aware that their data is being processed, and that they understand:

- **How the data is being used**
- **How to exercise their rights**

To these ends, Duet Academy of Dance has a privacy statement, setting out how data relating to individuals is used:

Using your personal information

Personal information which you supply to us may be used in a number of ways, for example:

- in case we need to contact you in an emergency
- to enter your child(ren) for examinations
- to comply with performance laws in respect of child welfare
- to keep a record of your child(ren)'s achievements and progress

We may share your information with, and obtain information about you from, the British Theatre Dance Association and the local city and county councils. For further information on how your information is used, how we maintain the security of your information, and your rights to access information we hold on you, please visit www.duetacademyofdance or email sara.duetacademy@gmail.com or by telephone 01455 284377.