

Privacy Notice

The General Data Protection Regulation (GDPR) came into effect on 25th May 2018. This Notice will provide information on how we, Sarah Royle School of Dance are complying with this Regulation.

Purpose and Statement:

Sarah Royle School of Dance is committed to ensuring the data processed by our school remains safe and secure.

This policy has been written in line with legislative change, including both the Data Protection Act (1998) and the EU's General Data Protection Regulation (GDPR).

Sarah Royle School of Dance has determined the lawful reasons with which it processes personal data:

Legal obligation – GDPR Article 6(1)(c)

Legitimate interest – GDPR Article 6(1)(f)

Contract – GDPR Article 6(1)(b)

There is also some limited data we process with consent from the Data Subject;
Consent – GDPR Article 6(1)(a).

While Sarah Royle School of Dance avoids sharing data with third parties at most times, some data is shared in accordance with our business practices. The sharing of data with third parties will always be consensual with the data subject and/or their parent/guardian, and only if Sarah Royle School of Dance is satisfied that their Data Protection policy is GDPR compliant.

Main Aims for the policy:

Specify the data Sarah Royle School of Dance collect, how it is stored/protected and the reason for collecting it

State how Sarah Royle School of Dance use personal data in processing

The GDPR includes the following rights for individuals:

Disclose who has access to the data and how long we retain information for Explain Data Subject's rights with Sarah Royle School of Dance data including access, rectification and erasure

the right to be informed

the right of access

the right to rectification

the right to erasure

the right to restrict processing

the right to data portability

the right to object the right not to be subject to automated decision-making including profiling

General Principles

Sarah Royle School of Dance is committed to providing fair and understandable privacy policies in relation to personal data.

Sarah Royle School of Dance will, at all times, keep data in secure locations (including, but not limited to, encrypted and access restricted files) and not retain data unnecessarily or past the retention length as set out in this policy.

In the rare instance a data processor that is not a Sarah Royle School of Dance employee is used, such as a third party, the data subject will either be asked for consent pre to supplying the data or be notified and have the right to object to processing.

Sarah Royle School of Dance customers and participants supply their personal data when signing up for classes through our registration form either via email, or via paper form. This will be completed by a parent/guardian.

Personal data may also come to us unsolicited via enquiries through our generic email account. To attend any of Sarah Royle School of Dance 's activities participants/parents/guardians must agree to some processing of their personal data. This is due to Legitimate Interests – GDPR Article 6(1)(f), Legal Obligation GDPR Article 6(1)(c), Contract – Article 6(1)(b) and/or Consent – Article 6(1)(a).

Should Sarah Royle School of Dance be unable to process participant's data, we would be contravening both our Health & Safety and Child Safeguarding policies. We would also be ignoring best practice regarding working with children/vulnerable adults.

Our participants must remain safe at all times, therefore information about participants must be collected in order to create registers and accurate student records. This information is also used to provide students with appropriate classes, including dividing students into age groups.

Special category data is only collected with the consent of the data subject. Special category data Sarah Royle School of Dance collects includes but is not limited to: Medical/Disability information, Ethnicity and Gender.

As physical activity providers it is essential that this consent is given should a participant have any medical/disability needs. This allows us to incorporate participants safely into classes. It is also used in assessing if we can incorporate participants safely into classes.

Special category data may be collected to provide information to funding bodies for statistical purposes. This data is always provided to third-parties as quantified data (i.e. cumulative numerical data only with no identifying information relating to any data subject).

Personal Data and Special Category Data

It is essential to our primary function (providing classes to participants) that we are provided, and allowed to process and store the following:

Participant Personal Data:

Full Name – GDPR Article 6(1)(f)

Date of Birth – GDPR Article 6(1)(f)

Home Address – GDPR Article 6(1)(f)

Gender – GDPR Article 6(1)(f)

Permission to go home alone – GDPR Article 6(1)(f)

School/Educational Institution – GDPR Article 6(1)(f)

Exam results (vocational exams taken through Sarah Royle School of Dance only – GDPR Article 6(1)(f)

Classes attended/Price paid – GDPR Article 6(1)(f) Participant Special Category Data:

Medical Information/History – GDPR Article 9 (a)

Disability Information – GDPR Article 9 (a)

Ethnicity – GDPR Article 9 (a & j) – further explicate consent sought Gender/Sex – GDPR Article 9 (a & j) – further explicate consent sought

Parent/Guardian Personal Data:

Name – GDPR Article 6(1)(f)

Address – GDPR Article 6(1)(f)

Email Address – GDPR Article 6(1)(f)

Mobile Telephone Number – GDPR Article 6(1)(f)

Work/Home Number – GDPR Article 6(1)(f)

Emergency Contact Number – GDPR Article 6(1)(f)

Parent/Guardian Special Category Data:

Concession Type – further explicate consent sought

Documented proof of financial need – further explicate consent sought

Bank Details – further explicate consent sought in the instance of refunds etc.

Sarah Royle School of Dance transports data with all due diligence. Enrolment forms are sent to Sarah Royle School of Dance through an encrypted email server or in paper form. Received enrolment forms are stored on an encrypted email server for no more than 12 months. Received paper enrolment forms are destroyed after 12 months.

Data received through enrolment forms is uploaded manually into our database software. Our database is

stored both in encrypted files on office-based hardware and backed up regularly in our encrypted cloud-based server. Access to these files is restricted through password protection and only available to authorised staff members.

Registers and emergency contact lists created from student data are stored in encrypted files on office-based hardware and backed up regularly in our encrypted cloud-based server. Access to these files is restricted through password protection and only available to authorised staff members.

Hard copies of registers and emergency contacts are carried by authorised staff members during events. They are locked away while not in use. When they are no longer in use or out-dated, they are destroyed. Waiting lists are stored on an encrypted cloud-based server.

Our standard retention policy (without the data subject's right to access, rectification and erasure etc.) is THREE YEARS post final attendance.

Exceptions to our retention policy:

Financial records are kept for 6 years due to legal obligation

First Aid records are kept for 21 years due to legal obligation

Photo consent may be kept indefinitely

Child Safeguarding records are kept indefinitely on a case-by-case basis, the minimum these will be stored for is 6 years due to legal obligation

Bank details are deleted after the action concerning them is complete

Enquiries that do not turn into bookings with current classes are deleted after they have been dealt with. Sarah Royle School of Dance does not actively share data with third parties, however there are certain instances where sharing information is crucial to our business processes.

Freelance Teachers:

As many of Sarah Royle School of Dance teachers are freelance staff, we have confidentiality and data processor agreements in place. Teachers will never be provided with personal details aside from participant's names, any medical information that is pertinent to the running of a class (subject to consent from the data subject) along with emergency contact details.

Constant Contacts/Outlook/Membermeister:

Sarah Royle School of Dance uses 'constant contacts, outlook and membermeister' to provide newsletters and marketing via email. This is an optional process, which people consent to during enrolment or sign-up. Data Subjects can opt-out and erase/rectify their record stored with constant contacts/outlook & membermeister at any time. Sarah Royle School of Dance is satisfied that their GDPR regulations are thorough, and the information stored is secure. We have a processor contract in place, and copies are available upon request.

Child Performance Licensing:

In order to process child performance licences, Sarah Royle School of Dance are legally required to provide some personal data to local councils (including but not limited to: full name, date of birth and school details). This is an optional consent, which will be sought at the time of sending participation consent forms. Sarah Royle School of Dance is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained. For more information visit your local council website and search for child performance licence.

Child Safeguarding Concerns:

In the unlikely event Sarah Royle School of Dance has a safeguarding concern in relation to one of our participants, Sarah Royle School of Dance are legally required to provide data to the safeguarding board at the local council. Sarah Royle School of Dance is satisfied that their GDPR processes are thorough and any data will be stored in a secure environment, and not unnecessarily retained.

Social Media:

Sarah Royle School of Dance regularly share photos/videos of students in workshops, events and performances through social media platforms including; Instagram, Facebook, Email. These will never be shared with any identifying information (age, location etc.). There may be times where we will share first names, but only with the explicit consent of the parents. All members of staff (PAYE, Freelance and Voluntary) must agree to this Data Protection policy prior to accepting a contract of employment.

Appropriate physical contact in lessons:

Teaching dance is a physical activity and appropriate physical contact between students and instructors in class is essential to training. Instructors can make physical contact following consent from a student to illustrate a concept or to adjust a student's alignment. Examples of adjustments include, but are not limited to, posture, full support in acro tricks, adjustment of the rib-cage, upper back, hips, and waist.

In choreographic teaching, instructors demonstrate positions and movements to the students by moving parts of the students' bodies and by moving dancers in relation to each other: this often involves contact with students. Sarah Royle School Of Dance recognises its responsibilities for safeguarding students and instructors and for protecting their welfare.

The following principles and procedures are in place to fulfil the School's obligations:

Contact by the instructor is made with particular awareness of the needs of each individual, to assist the dancer in correcting placement

All instructors will treat any physical contact with due sensitivity and care, and with due regard for the wishes of the student

Contact will not involve force or the use of any instrument

Students and parents are encouraged to discuss any worries with any instructor or an independent listener.

Both students and instructors should feel free to report any concerns to the Principal or any teacher or chaperone.

Payments & Fees

If for any reason you have to miss class, leave the school there will be no refunds given at any time. If you wish to leave, there is 1 x term notice and fee's must be paid for the entire term. Our school runs termly for the entire year (including summer). By agreeing to our terms you are agreeing to commit to all termly payments whilst you are a member. Failure to do so will result in being removed from classes.

Data Protection Contacts and Complaints

Sarah Royle School of Dance is registered as a Data Controller with the Independent Commissioners Office (ICO). The registered Data Protection Officer (DPO) is General Manager Emma Hobday.

Complaints in regard to the handling of any personal data can be made directly to Sarah Royle School of Dance's Email: sarahroyleschoolofdance@outlook.com

If you feel that your complaint was not handled in the correct manner, or still have concerns, you may escalate the complaint by either contacting Sarah Royle School of Dance's Chair of Trustees (details upon application) or by contacting the Independent Commissioner's Office (ICO). ICO Telephone Number: 0303 123 1113

Data Breaches:

If Sarah Royle School of Dance experiences a data breach of any kind, we have a legal obligation to report this to ICO within 72 hours. The data breach will be reported by the DPO. In the instance they are unavailable to report the breach, the next most senior staff member shall do so. Sarah Royle School of Dance will also inform all the victims of the data breach as soon as possible if there is a high risk of adversely affecting individuals' rights and