

### General Data Protection Regulation Policy

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 individual data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Holly Collins School of Dance 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.

What we do at Holly Collins School of Dance:

- We do not disclose or sell personal data to third parties.
- We do not disclose personal data to other members of the school and their families.
- The School uses contact numbers and emails for newsletters, updates, whole school and individual communication, invoices and general information.
- Personal data is stored in a locked password encrypted email database and locked invoicing system.
- Paper registration forms are stored in a secured cabinet at the principals home address.
- Hard copy information is destroyed by shredding 6 years after a student has left classes at the School.

Information about individual children is used in certain documents, such as, a weekly register and examination documentations. These documents

include data such as children's names, date of birth and emergency contact numbers. These records are shredded after the relevant retention period.

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

Holly Collins School of Dance stores personal data held visually in photographs or video clips or as sound recordings. No names are stored with images in photo albums, displays, on the RMS website or on any Holly Collins School of Dance social media sites.

Access to the school email account, website, personal data, social media accounts, newsletters and examination Details is password protected and is not available to members of the public or members of the school. The Principal and her administrator have sole access to all this data. When a member of staff leaves the school, the passwords are changed in line with this policy and our safeguarding policy.

GDPR includes 7 rights for individuals

1) The right to be informed

Holly Collins School of Dance is registered with the Imperial Society of Teachers in Dance (ISTD) and as so, is required to collect and manage certain data. The school collects parent's and or guardian's names, addresses, emergency telephone numbers and email addresses. We also collect children's' full names, addresses, date of birth along with any SEN requirements and are stored via a secure electronic system Class Manager and paper registration forms are stored in a secured cabinet at the Principal's home address.

This is in respect of our Health and Safety and Safeguarding Policies.

## HOLLY COLLINS SCHOOL OF DANCE

As an Employer of self employed practitioners, Holly Collins School of Dance is required to hold data on its Teachers such as names, addresses, email addresses, telephone numbers and bank details. Information such as Disclosure and Barring Service checks (DBS), personal Public Liability insurance, First Aid Certificate's, Membership details and any qualification's. This information stored via Class Manager and paper forms are stored in a secured cabinet at the Principal's home address.

### 2) The right of access

At any point an individual can make a request relating to their data and Holly Collins School of Dance will need to provide a response (within 1 month). Holly Collins School of Dance 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.

### 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 Holly Collins School of Dance has a legal duty to keep student and parents details for a reasonable time. Self Employed Teaching records will be erased when the member leaves their position. All hard copy information is destroyed via secure information shredding service.

### 4) The right to restrict processing

Parents, visitors and staff can object to Holly Collins of Dance processing

their data. This means that records can be stored but must not be used in any way, for example School Newsletters, General Emails about School news and updates. In this situation, The School has no obligation to refund any classes missed or cancelled due to 'lack of communication'. It will be the parents responsibility to ensure they are informed about the termly event's happening at the School.

#### 5) The right to data portability

Holly Collins School of Dance requires data, for example registration forms to be transferred from student, to teacher, to School Principal. The School also require's to provide data such as student DOB and exam pin number's to be able to enter students in ISTD Exams. In this case 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. Holly Collins School of Dance does not use personal data for such purposes.

This Policy was issued by the Principal Holly Collins, owner of Holly Collins School of Dance in September 2019.

Policy review date: September 2025