

# NEW LONDON PERFORMING ARTS CENTRE PRIVACY POLICY

Last reviewed: September 2022

New London Performing Arts Centre (NLPAC) is committed to process any personal information it holds only in ways that are fair, transparent and in accordance with the Data Protection Act 1998 and its successor the General Data Protection Regulations (GDPR) which comes into effect on 25th May 2018.

NLPAC will take particular care over email addresses which, in addition to the GDPR, are subject to the Privacy and Electronic Communication Regulations (PECR).

The legislation sets out various data protection principles. These ensure that personal information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

As the data controller, NLPAC will process any confidential information given during registration. The data will be stored securely, no longer than necessary and solely for the completion of the centre's activities.

GDPR includes 7 rights for individuals:

## 1) The Right to be informed

### What data is stored

#### Parents/Guardians/Students

Parent/Guardian name, address, contact details, student name, date of birth, medical information, special educational needs information, emergency contact details, consent to photograph and video for students.

Parent contact details will be used only to email relevant communications pertaining to their child's class or course, invoicing and newsletters holding important information and term dates. Telephone numbers may be used as a secondary form of contact for urgent or important information.

Student names, dates of birth, medical information, special educational needs information and emergency contact information are required for health and safety and child protection purposes.

Student information including name and date of birth will be provided to the ISTD, RAD, ABRSM, Trinity and RGT examinations boards should a parent consent to their child taking an examination. Students over 16 are required to provide photographic ID when

taking vocational examinations with the ISTD or RAD. In the case of teacher training students, a photocopy of the ID form is securely held and passed on to the ISTD examining board for quality assurance purposes.

## **Staff and Teachers**

As an employer, NLPAC is required to hold data on its staff and teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance Numbers, photographic ID, right to work, bank details. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK.

## **Studio Hirers**

NLPAC rents studio and room space to outside users. For studio hirers the information that is collected and stored is: Name, address, contact number, email, Public Liability Insurance details and, where applicable, proof of fitness/teaching qualification. This information is securely held and is not disclosed to any 3rd parties.

NLPAC does not store credit card or payment details nor do we share customer details with any 3rd parties except where there is a legal right or duty to disclose.

Personal data will be retained as required by law and stored securely. It will then be destroyed and deleted securely once a student has ceased classes after the duration of our legal obligation to hold the records.

NLPAC uses Cookies on its website to collect Google Analytics; this data is anonymous.

## **2) The right of access**

All students, participants, parents, staff and room hirers have the right to know what personal information is held about them.

NLPAC tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by asking. NLPAC will provide response within 1 month. If we do hold information about you we will:

- give you a description of it.
- tell you why we are holding it.
- tell you who it could be disclosed to.
- let you have a copy of the information in an intelligible form.

## **3) The right to erasure**

All students, participants, parents, staff and room hirers have the right to withdraw their consent for their personal data to be retained at anytime, where there is no compelling reason for its continued use such as HMRC records, Child Protection Records, etc.

Once the legal retention period has elapsed, records will be securely destroyed and any paper records shredded.

\*To withdraw or request information, contact 020 8444 4544 or [info@nlpac.co.uk](mailto:info@nlpac.co.uk)

*\*Please be advised, if a parent wishes to withdraw personal information while their child is still enrolled in classes with NLPAC, this may affect their ability to continue in classes due to health and safety and child protection reasons.*

#### **4) The right to restrict processing**

All students, participants, parents, staff and room hirers can object to NLPAC processing their data. This means that records can be stored but must not be used in any way, for example for exam submissions, reports or communications.

#### **5) The right to data portability**

NLPAC requires data to be transferred from one IT system to another such as dance and music associations for examinations. Teachers use class registers held on a cloud system where only the students' name, age and any relevant medical information is disclosed. Registers are held on the DanceBiz App and are password protected. In cases where online systems fail, paper registers will be used by teachers and securely shredded once the information on attendance is transferred to the computer system.

#### **6) The right to object**

All students, participants, parents, staff and room hirers 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 and in some organisations for the purposes of staff recruitment. NLPAC does not use personal data for such purposes.

### **HOW NLPAC COLLECTS AND STORES DATA**

All paper copies of children's and staff records are kept in a locked filing cabinet on site at the Centre. 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 about individual children is used in certain documents; a weekly register, medication forms, referrals to external agencies and disclosure forms. These documents include children's names, dates of birth and addresses. These records are shredded after the relevant retention period.

NLPAC stores personal data held visually in photographs or video clips or as sound recordings, only when written consent has been given. No names are stored with images in photo albums, displays, on the website or on NLPAC's social media sites.

Access to all office computers is password protected. Access to Google Drive and DanceBiz database software is password protected. When a member of staff leaves the company, these passwords are changed in line with this privacy policy and our safeguarding policy.

In accordance with NLPAC's *Recognised School* status with the Council for Dance, Drama and Musical Theatre, information on all teachers is given to the Council for Dance, Drama and Musical Theatre including name, teaching qualification, place of study. Permission will always be sought before disclosing this information to the CDMT.

NLPAC uses Google Cloud services, primarily Google Forms, for workshop course registration, gathering examination consent from parents or for signing up students for theatre trips or performances. All information is held by Google outside of the EU, however is securely kept and password protected. Google participate in the E.U – U.S Privacy Shield Framework and comply with the Privacy Shield Principles.  
<https://www.privacyshield.gov>

NLPAC uses DanceBiz (ThinkSmart Software) to process and collect booking information, invoicing and students registrations. This software is password protected. Please see the ThinkSmart Software privacy Policy for more details.  
<http://www.thinksmartsoftware.com/en-gb/privacy-policy.html>

Parents are able to pay for class fees online with DanceBiz through PayPal. NLPAC does not process any online payment information. Please see the PayPal Privacy Policy for more details. <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

NLPAC takes credit and debit card payment at reception and over the phone. NLPAC does not store credit/debit card details. Credit/debit card payments are processed through 123send.

Sage is used to process employee information for the purpose of wages, payment and payslips. Payslips are emailed to employees on a password protected document. Please see the Sage Privacy Policy for more details. <http://www.sage.com/company/privacy-notice-and-cookies>

All students, participants, parents, staff and room hirers have the right to complain to the ICO (Information Commissioner's Office), if they believe there is a problem with how their data is handled.