

CHARLOTTE JACQUELINE  
School of Dance

**PRIVACY POLICY**

## **Privacy Notice**

The Charlotte Jacqueline School of Dance (the "School") is committed to protecting the personal information it holds for all our students, employees, casual and freelance workers. This privacy notice is intended to provide information about how the School will use or process personal data about individuals including current, past and prospective students, staff and volunteers; and their parents, carers or guardians (referred to in this policy as "parents"). This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Parents, students, staff and volunteers are all encouraged to read this Privacy Notice to understand the School's obligations. Anyone who works for, or acts on behalf of the School should comply with this Privacy Notice.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

### **Responsibility for Data Protection**

The School has an appointed Compliance Officer who will deal with your requests and enquiries concerning the School's use of your personal data and who will endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

Contact email address: [cj-dance@outlook.com](mailto:cj-dance@outlook.com) or postal address: The Compliance Officer, Low Whaston Springs Farm, Whashton, Richmond, North Yorkshire DL11 7JS

### **Data Protection Principles**

The current legislation sets out various data protection principles. These include 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

The GDPR also includes the following rights for individuals

- the right to be informed
- the right of access
- 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

How to exercise these rights is included in sections towards the end of this privacy notice.

## **Why the School Needs to Process Personal Data**

Uses of personal data will be made in accordance with the School's legitimate interests or by an individual's consent. In broadest terms, this means that we can process personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests. Before using this basis, we carefully consider and balance any potential impact on you and your rights. Some data we hold is held by individual's consent.

The School expects that the following uses will fall within the category of its "legitimate interests".

- to provide educational and artistic services and to monitor students' progress
- to confirm the identity of prospective students and their parents
- to enable students to take part in recognised qualification exams of the RAD and ISTD
- to safeguard students' welfare
- to make use of photographic images of students in School publications, on the School website and on the School's social media channels (consent will be sought for this use)
- where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School

In addition, the School will on occasion need to process special category personal data (concerning health) or criminal records information (such as when carrying out DBS checks) in accordance with rights and duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- to safeguard students welfare (and where necessary medical care) and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so for example to volunteers at a School event who need to be made aware of dietary requirements or medical needs.
- In connection with employment of staff, for example DBS checks.
- To provide educational dance services in the context of any special educational needs of a student.

## **Types of Personal Data Processed by the School**

When you sign up to classes or participate in an activity or workshop with the Charlotte Jacqueline School of Dance we may collect and store data about you. This can consist of information such as:

- Your name, postal address, email address, telephone numbers, date of birth, and medical details (allergies and injuries).
- Past and present student(s) attendance records and examination scripts and marks.
- Correspondence with and concerning students and parents: and still and moving images of students engaged in School activities.
- transaction details
- information relating to feedback
- alumni information including photographic images taken during your training at the School

When taking pictures of students in class or filming performances, Charlotte Jacqueline School of Dance asks for your consent/parent's consent. These images and filming and any reproductions or adaptation of these images may be used for, but not limited to, publicity, fundraising promotion or advertising. This might include (but not limited to) the right to use them on the School's website, press releases, social media, printed and online publicity.

Depending on your settings or privacy policies for social media like Facebook, LinkedIn, Instagram or Twitter, you may give us permission to access information from those accounts or services.

### **How the School Collects Data**

Generally, the School receives personal data from the individual directly (including in the case of younger students, from their parents). This is usually via a form, or may be in the ordinary course of interaction or communication (such as emails).

### **How We Use Data**

We always endeavour to be fair and transparent with how we use your information and ensure at all times that your information is protected.

The personal data you provide may be used:

- in relation to any service or activity you have signed up for in order to ensure that we can deliver the services to you
- to send you relevant communications for payment of fees and changes to classes, or fulfil a purchase (e.g. events and course bookings)
- to send you information you requested when you voluntarily contacted us via our website.
- for alumni purposes
- to email our newsletter and other items we believe may be of interest to you
- for marketing purposes when specific consent has been given
- to better understand your preferences in order to tailor our communications to suit your interests
- to analyse and improve the services we may provide
- to act in accordance with the School's safeguarding and child protection policy

We will not hold more information than required and will ensure all personal data held is kept up to date and used only for its specific purpose(s) outlined above. The retention policy will vary according to the purpose and may be contingent on circumstances when required to keep the data on the grounds of legal obligation and legitimate interest. Please contact [cj-dance@outlook.com](mailto:cj-dance@outlook.com) for further information on how long we may keep your data.

We will not sell, rent, trade or distribute your personal data to any third parties for marketing purposes. Data may be shared with trusted services providers who are authorised to act on the School's behalf and have entered into data processing agreements with us. These services may include website hosting and email delivery services. In these circumstances your data will only be used for the agreed purpose relating to the service that they are providing. We do not transfer any data to countries outside the European Economic Area (EEA).

### **Who Has Access to Personal Data and Who the School Shares It With**

For the most part personal data collected by the School will remain within the School office, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know basis').

However, a certain amount of any SEN student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and teaching that the student requires.

Staff, students and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature and regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please see the School's Safeguarding Policy.

This policy does not cover the links within our website to other websites. We encourage you to read the privacy statements on the other websites you visit.

### **Data Processors**

Data processors are third parties who provide a service to us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. The following is a list of our main data processors. There may be others from time to time.

For those students who wish to take exams, the School will need to share personal information with third parties, either the Royal Academy of Dance (RAD) and the Imperial Society of Teachers of Dancing (ISTD). This will include information required under examination special requirements to allow for a Reasonable Adjustment/Special Dispensation.

North Yorkshire County Council/Local Authority – for chaperone licences, BOPA licences and other documentation required when presenting shows etc.

Posting – If we send you a letter/parcel via post we will share your postal address with the delivery service (usually Royal Mail or Parcel Force).

Website Hosting – We use a third party service **WIX** to host our website. Wix Privacy Policy states the following:

*“Wix has no direct relationship with the individual Users-of-Users whose Personal Information it processes. If you are a visitor, user or customer of any of our Users, and would like to make any requests or queries regarding your Personal Information, please contact such User(s) directly. For example, if you wish to access, correct, amend, or delete inaccurate information processed by Wix on behalf of its Users, please direct your query to the relevant User (who is the “Controller” of such data). If requested to remove any Users-of-Users’ Personal Information, we will respond to such request within thirty (30) days.”*

DBS Service - A DBS service for the School for teachers and chaperones is provided by (Due Diligence Checking Ltd). Information provided by them will only be shared with the individual concerned. The records are kept for three years and then deleted.

Website Visitors – When someone visits [www.cjschoolofdance.com](http://www.cjschoolofdance.com) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour

patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

## **Security**

We use secure technologies to help protect your personal information from unauthorised access, use or disclosure. We store personal information you provide on computer systems which have carefully controlled access. Paper copies of information are kept in a locked filing cabinet.

The security measures detailed ensure all reasonable steps are taken to protect your personal information. However, the nature of the internet means that an absolute guarantee of security cannot be offered, and, as with all internet transactions, you should be aware that there may be a small security risk when disclosing information on line. Any portable electronic data storage e.g. memory stick, is password protected and is stored in a locked filing cabinet when not in use.

Information about individuals held on class registers e.g. names etc., emergency contact are required during class time and are held by the School Principal. When not in use registers are also stored in a locked filing cabinet.

When a teacher/employee leaves the School passwords are changed for all databases holding personal information that they have had access to use.

Data held visually in photographs and video recordings has no names stored with it and has had written consent obtained for use by the School.

## **Retention**

Personal information for students is held by the School for the time an individual is registered at the school and where necessary, for three years, following departure from the School, unless there is a specific legal requirement to retain for a longer period.

Personal information for employees/volunteers will be held in line with legal recommendations e.g. HMRC requirements. Any personal information not required to meet legal recommendations will be destroyed three years after leaving the School.

## **Your Rights**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School and in some cases can ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it, but subject to certain exemptions and limitations.

- 1.) the Right to be informed – this privacy notice endeavours to clearly inform individuals of the data that we hold and the reasons why we hold it.
- 2.) the right of access – Individuals can make a request to the School for any personal data that we hold on them. This is formally known as a ‘subject access request’ and should be made in writing to the Compliance Officer. The School are obliged to provide this within the statutory time limit of one month, or if a request is refused explain the reasons for the refusal. The individual will have the right to complain to the ICO if they are not happy with the decision.

If we hold information 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

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information that is subject to legal professional privilege. The School is also not required to disclose any student examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the School for the purposes of education, training or employment of any individual.

- 3.) The right to rectification – the School will endeavour to ensure that all individual personal data held is up to date and accurate. Individuals are requested to inform the School of any significant changes to important information, such as contact details, held about them. An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions under Data Protection Law).
- 4.) the right to erasure – you have the right to request the deletion of any data where there is no compelling reason for its retention. However some data is governed by legal requirements or falls within a legitimate interest identified in this privacy notice. All requests will be considered on their own merits.
- 5.) the right to restrict processing – An individual can object to the School processing their data. The records can be stored but must not be used in any way, for example communications.
- 6.) the right to data portability – this allows an individual to access or re-use their personal data for their own benefit. It only applies to
  - personal data an individual has provided to a Controller
  - where the processing is based on the individual's consent or for the performance of a contract
  - when processing is carried out by automated means
- 7.) the right to object – an individual can object to their data being used for certain activities e.g. marketing.
- 8.) the right not to be subject to automated decision making including profiling

### **Consent**

Where the School is relying on consent as a means of processing personal information, any person may withdraw this consent at any time (subject to age considerations). Please be aware the School may have another lawful reason to process the personal data in question even without consent.

### **Whose rights?**

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to students.

Students can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. A student of any age may ask a parent or other representative to make a subject access request on his/her behalf. For older students the parent making the request may need evidence of their child's authority for the specific request.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about students without their consent.

This privacy notice may be updated from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Any comments or queries on this policy should be directed to the Compliance Officer. If an individual believes that the School has not acted in accordance with the Data Protection Law, they should notify the Compliance Officer (the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator).

## **Social Media**

The School has two official social media sources both of which are secured and controlled by the Charlotte Jacqueline School of Dance.

They consist of official pages on:

Facebook (Verified) - [www.facebook.com/CharlotteJacquelineDance](https://www.facebook.com/CharlotteJacquelineDance)

Instagram - [www.instagram.com/cj.schoolofdance](https://www.instagram.com/cj.schoolofdance)

The School is not responsible for or involved in any other unofficial pages, channels or accounts.

The School advises anyone visiting or using social media sites to avoid posting their personal data. The School will only publish personal data at the express written consent of the person involved (or their parent/guardian where they are under 18) or if it is already in the public domain. The School will not publish personal data including addresses or contact details other than those of School staff and this will always be limited to business contacts.