



General Data Protection Regulation Policy

Statement

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 individuals data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Afonso School of Performing Arts Ltd. is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors and self-employed 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.

Afonso School of Performing Arts Ltd. is registered with the ICO (Information Commissioners Office) under registration reference: **ZA341463**

Anyone can request to see a copy of this certificate at any time.

GDPR includes 7 rights for individuals

1) The right to be informed

Afonso School of Performing Arts Ltd. is a registered Performing Arts provider with IDTA and as so, is required to collect and manage certain data. We need to know parent's names, addresses, telephone numbers, email addresses. We need to know children's' full names, addresses, date of birth, medical information, and sometimes, Education school, along with any SEN requirements. We can be requested to provide this data to Hertfordshire County Council; this information is sent to the Local Authority via a secure electronic file transfer system.

We are required to collect certain details of visitors to our Performing Arts school. We need to know visitor's names, telephone numbers, and where appropriate, company name. This is in respect of our Health and Safety and Safeguarding Policies.

As a contractor of self-employed people, Afonso School of Performing Arts Ltd. is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, tax numbers, photographic ID such as passport and driver's license, bank details.



This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK. This information is sent via a secure file transfer system to our umbrella company, DDC Ltd. for the processing of DBS checks. DBS Numbers and date of issue are also held on a central staffing record.

Afonso School of Performing Arts Ltd. uses Cookies on its website to collect data for Google Analytics, this data is anonymous.

2) The right of access

At any point an individual can make a request relating to their data and Afonso School of Performing Arts Ltd. will need to provide a response (within 1 month). Afonso School of Performing Arts Ltd. 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. The individual will have the right to complain to the ICO if they are not happy with the decision.

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, Afonso School of Performing Arts Ltd. has a legal duty to keep children's and parent's details for a reasonable time*. Afonso School of Performing Arts Ltd. retain these records for up to 3 years after leaving the school. Children's accident and injury records for 19 years (or until the child reaches 21 years), and 22 years (or until the child reaches 24 years) for Child Protection records.

Data regarding finances, such as invoices, will be kept on our secure database for 7 years, to comply with the current laws set by the HMRC. This may mean that other personal data cannot be forgotten.

Teacher records must be kept for 6 years after the member leaves employment, before they can be erased. This data is archived securely onsite or online, and shredded or deleted after the legal retention period.

4) The right to restrict processing

Parents, visitors and staff can object to Afonso School of Performing Arts Ltd. processing their data. This means that records can be stored, but must not be used for the requested reasons. In doing so, there may be a negative impact, such as the Afonso School of Performing Arts Ltd. not being able to enter your child in for an exam. You will be informed of any such negative impact, on request.



5) The right to data portability

Afonso School of Performing Arts Ltd. requires data to be transferred from one IT system to another; such as from Afonso School of Performing Arts Ltd. to the Local Authority, for performance BOPA licences, and dance Associations for examinations. These 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. Afonso School of Performing Arts Ltd. does not use personal data for such purposes.

Storage and use of personal information

Afonso School of Performing Arts Ltd. no longer require paper copies of data to be used on a weekly basis. If and where we do, such as on show days, or in case of technical issue, we will carry this in a locked briefcase.

Members of staff have restricted access to online files, but information taken from the files about individual children is confidential and apart from archiving, these records remain on site at all times.

Any paper records are shredded after the retention period.

Information about individual children is used in certain documents, such as, a weekly register, medical forms, referrals to external agencies and disclosure forms. These documents include data such as children's names, date of birth and sometimes address. These records are shredded after the relevant retention period.

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



Afonso School of Performing Arts Ltd. 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 website or on Afonso School of Performing Arts Ltd. social media sites.

Access to all office computers is password protected and all files are stored in an encrypted format. When a member of staff leaves the company these passwords are changed in line with this policy and our Safeguarding policy. Any portable data storage used to store personal data, e.g. USB memory stick, are password protected and/or stored in a locked filing cabinet.

GDPR means that Afonso School of Performing Arts Ltd. must;

- * Manage and process personal data properly
- * Protect the individual's rights to privacy
- * Provide an individual with access to all personal information held on them

This Policy was adapted in May 2018.

Signed on behalf of Afonso School of Performing Arts Ltd.

Alicia Afonso

Alicia Afonso LIDTA

(Principal and owner of Afonso School of Performing Arts Ltd.)

Policy review date: September 2018