

GDPR POLICY

JAN 2019



GENERAL DATA PROTECTION REGULATION POLICY STATEMENT

M Dance is a registered trading name of MK Arts Ltd

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.

MK Arts Ltd is committed to protecting the rights and freedoms of individuals with respect to the processing of students, 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.

MK Arts Ltd is registered with the ICO (Information Commissioners Office) under registration reference:

Certificates are on display on the information boards at the school.

GDPR includes 7 rights for individuals

1) The right to be informed

MK Arts Ltd are a private organisation operating in the extra curricular education sector and as so, are required to collect and manage certain data. We need to know parent's names, addresses, telephone numbers, email addresses. We need to know Students' full names and date of birth along with any medical requirements.

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

As an employer MK Arts Ltd is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance 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 Capita for the processing of DBS checks. DBS Numbers and date of issue are also held on a central staffing record.

MK 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 MK Arts Ltd will need to provide a response (within 1 month).MK 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 MK Arts Ltd has a legal duty to keep students and parents details for a reasonable time*, MK Arts Ltd retain these records for 3 years after leaving the organisation, accident and injury records for upto 3 years for Child Protection records. Staff records must be kept for 6 years after the member leaves employment, before they can be erased. This data is archived securely and shredded after the legal retention period.

4) The right to restrict processing

Students, parents, visitors and staff can object to MK Arts Ltd processing their data. This means that records can be stored but must not be used in any way, for example reports or for communications.

5) The right to data portability

MK Arts Ltd may require data to be transferred from one IT system to another; such as from MK Arts Ltd to third parties for safeguarding purposes. 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

Students, 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. MK Arts Ltd does not use personal data for such purposes.

8) Storage and use of personal information

All paper copies of students and staff records are kept in a locked filing cabinet, within a locked office at Eastern School of Performing Arts, Stamford. All electronic records are kept on a secure data system with MK Arts Ltd. Access is only available to members of staff who have passed through MK Arts Ltd clearance.

Members of staff can have access to paper files but information taken from the files about individual students 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 students is used in certain documents, such as, registers, referrals to external agencies and disclosure forms. These documents include data such as student names, date of birth and sometimes contact information. These records are shredded after the relevant retention period.

MK Arts Ltd stores personal data held visually in photographs or video clips or as sound recordings for both compliance and publicity purposes. All transfers of data are through secure sharing facilities. Students sign consent forms at the point of registration, and photographs, videos, sound recordings are not held with names upon a student leaving.

Access to all electronic services is password protected. 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 MK 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 agreed by MK Arts Ltd in January 2019

Signed on behalf of MK Arts Ltd by

Matt Wheatley

Policy review date: January 2020

