

## Severn Arts Full Privacy Notice

This privacy statement is intended for parents/carers, schools and Severn Arts employees. In due course we intend to create separate, specific policies for each.

### Our responsibilities

Severn Arts collects, processes and stores a wide range of information, including some personal details, in order to deliver our services efficiently.

We are responsible for managing the information we hold and we recognise that this information is important to you. We take our responsibilities seriously and use personal information fairly, correctly and safely in line with the legal requirements set out by the General Data Protection Regulations (GDPR). Anyone who receives information from us is also under a legal duty to do the same and has a set of data protection clauses included in their contract.

Where we need to share sensitive or confidential information such as medical details, we will do so only with your consent or where we are legally required to do so. We may share information to prevent risk of harm to an individual.

We keep our privacy notices under regular review. This privacy notice was last updated on **18th May 2018**.

### Why we need your information

We will use your personal information for a limited number of purposes and always in line with our responsibilities, where there is a legal basis and your rights under the GDPR:

We will process personal information:

- for the purpose for which you provided the information, e.g. to provide you with music lessons, instrument hire, ensemble membership;
- to enable us to communicate with you and provide the services you need;
- to monitor our performance in providing services to you; to gather statistical information to allow us to plan future provision of services and to obtain your opinion about our services;
- to monitor the progress of individuals receiving services from us;
- to meet various legal requirements. For example, you will be asked to provide us with medical information relating to your child if they attend any of our activities outside of a school day. We have a legal duty for the health and safety of children attending activities outside of school;
- to enable us to perform statutory law enforcement functions and/or for the prevention and/or detection of crime, for example compliance with Keeping Children Safe in Education;  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- to process financial transactions including grants, payments and benefits directly involving us, from parents/carers and schools, or where we are acting on behalf of other government bodies such as Department for Education, Department for Digital, Culture, Media and Sport.
- where it is necessary to protect individuals from harm or injury;
- to promote the services we provide where you have given your consent for us to do so;

- where it is permitted under the GDPR, for example, to comply with legal obligations or for us to seek legal advice or undertake legal proceedings.

We may not be able to provide you with a product or service if we do not have enough information and, in some instances, your consent to use that information.

We aim to keep your information accurate and up to date. You can help us to do this at any time by letting us know if any of the information you have given us, such as your address, changes. Visit our contact page for more details <https://www.severnarts.org.uk/contact/>

## **Ways in which we collect your information**

### **Face to face:**

We may keep a record of your contact with us to assist us in the delivery and improvement of the services that we provide to you and to others. Any such records that include personal information will be kept securely.

### **Telephone calls:**

Ordinarily we will inform you if we record or monitor any telephone calls you make to us. We may do this to increase your security, so that we have a record of a call taking place and/or for training and quality purposes.

### **Emails:**

If you email us we may keep your email as a record that you have made contact. This includes your email address.

### **Online:**

- **Cookies**

Cookies are small text files that are placed on your computer by some websites that you visit. They are widely used in order to make websites work, or to make them work more efficiently, as well as to provide information to the owners of the site. Details about how we use cookies can be found on our website

- **Other websites**

On our website you may find links to other external websites which we have provided for your information and convenience. This privacy notice applies solely to Severn Arts. We are not responsible for the content of those sites. When you visit other websites, we recommend that you take time to read their own privacy notices.

## **Purpose for processing and legal basis**

### **Purpose:**

Severn Arts processes customer and employee personal data in order to provide a music education service.

This includes the following examples:

Communicating with customers in order to

- invoice for lessons, instrument hire or group membership
- send information (such as timetables) for rehearsals/performances

Severn Arts will hold contact details for parents/carers and children and will process sensitive personal data such as children's medical information in order to ensure their safety as part of our legal obligation.

Severn Arts will collect information for reporting and monitoring purposes e.g.: registers and pupil progress reports.

Severn Arts holds information relating to Pupil Premium and Looked After Children in order to decide on the use of remissions when charging for lessons.

Severn Arts will also promote the service to customers and take photographs of customers if they consent to this, from 25<sup>th</sup> May 2018.

#### Lawful basis:

We will only process personal data where we have one of 6 'lawful bases' to do so under Article 6 of the EU General Data Protection Regulations.

Most commonly:

- To **fulfil a contract** with the individual
- For the **legitimate interests** of Severn Arts (provided the individual's rights and freedoms are not overridden)
- Where the individual (or their parent/carer when appropriate in the case of a child) has freely given **consent** (for example, to receive notification of upcoming events, to have photographs taken)

And exceptionally:

- To **comply with a legal obligation**
- To ensure the **vital interests** of the individual e.g. to protect someone's life
- To perform a task **in the public interest**

#### **Information collected**

Personal data that we may process about individuals and music service users includes, but is not restricted to:

- Your full name and title and date of birth and your gender
- Next of kin
- Postal address, email address and phone number
- IP (internet protocol) address e.g. cookies

- Emergency contact details and contact preferences
- Name of school attended
- Ethnicity
- Student records
- Results of auditions, internal assessments and externally set exams
- Characteristics, such as special educational needs
- Details of any medical conditions or dietary requirements
- Attendance information
- Safeguarding information
- Details of any support received
- Gift Aid status
- Payment card details (these are not stored)
- Photographs and video recording
- CCTV images captured on Severn Arts premises (see below)
- If you hold a Severn Arts instrument on loan

### **What we will do with your information**

When deciding what personal information to collect, use and hold, we are committed to making sure that we will:

- only collect, hold and use personal information where it is necessary and fair to do so
- keep your personal information secure and safe
- securely dispose of any personal information when it is no longer needed
- be open with you about how we use your information and who we share it with; and
- adopt and maintain high standards in handling any personal information.

We may disclose personal information to a third party, but only where it is required by law, where that third party needs that information to provide you with a service on our behalf or where it is otherwise allowed under the GDPR. We will strive to make sure that the third party has sufficiently robust systems and procedures in place to protect your personal information.

### **How long we will hold your information**

We will not keep your information any longer than needed to provide the services you require unless the law states the period that such records should be kept.

We follow Worcestershire County Council's retention schedules which contain information about how long to keep different types of information. When we dispose of personal information we will do so in a secure way.

### **Who we may share your information with**

Your personal information may be shared within Severn Arts or with external partners and agencies involved in delivering services on our behalf. They will only have access to your information if it is needed to provide you with a service or to comply with a legal/financial obligation. This does not mean that we share all the personal data you give us, only what is necessary for very specific purposes.

- For parents – personal data is shared within Severn Arts for the provision of music education. For instrument hire or procurement of other services, we may in future carry out checks with credit reference agencies and in rare instances, where customers are in default of payments, information may be shared with other agencies for debt management purposes.
- For schools – personal data is shared between Severn Arts and your specific school only
- For staff of Severn Arts – personal data is shared with our suppliers such as our Payroll provider

Severn Arts will seek to ensure that the third party has sufficient systems and procedures in place to prevent the loss or misuse of personal information. If your personal information is transferred outside the European Economic Area (EEA) for processing or storage purposes Severn Arts will ensure that safeguards are in place to protect it to at least the standard applied within the EEA.

### **Your information rights**

Under the General Data Protection Regulation you, as the Data Subject, have the following rights. Each request will be reviewed and actioned wherever possible. However, you should be aware that, due to the reasons that Severn Arts may be processing your information, we may not be able to comply with some requests due to legal obligation.

You have the right to:

- access the information we hold about you
- request that we rectify any information about you that is incorrect. Simple inaccuracies, such as address changes, will be made. However, depending on the purpose for processing, records (including statements and opinions) may not be changed, but there will be the option for you to provide a supplementary statement which will be added to the file.
- request that records we hold about you are erased;
- restrict processing of the information we hold about you if you have an objection to that processing, whilst your objection is investigated;
- request that any information that you have provided to us is given back to you in a format that you can give to another service provider if required;
- object to processing of your personal information including automated decision making and profiling
- Make a complaint to a supervisory authority if you are not satisfied with how the information held about you has been handled.

For any such requests, please visit <https://www.severnarts.org.uk/contact/>

### **Use of personal information for marketing**

We will only send you information about our services and/or products if you have opted in to receive them. We may also share your information with other service providers who may contact you with details of services they provide if you give us permission to do this. You can change your mind at any time by letting us know <https://www.severnarts.org.uk/contact/>

### **Use of CCTV**

We may be installing CCTV systems in our HQ premises and van for the purposes of public safety and the prevention and detection of crime. Signs will be prominently displayed notifying you that CCTV is in operation and providing you with details of who to contact for further information about them.

We will only disclose CCTV images to third parties for the purposes as stated above of public safety and the prevention and detection of crime. CCTV images will not be released to the media for entertainment purposes or placed on the internet.

Once CCTV is in place, you will have the right to see CCTV images of yourself and be provided with a copy. Please see <https://www.severnarts.org.uk/contact/>

### **The prevention and detection of fraud**

Severn Arts is required by law to protect the public funds it administers. Therefore we may use any of the information you provide to us for the prevention and detection of fraud or to comply with the law.

As well as conducting our own 'data matching' exercises we may also share your information with other public bodies. These include (but are not limited to):

- The Audit Commission
- Department for Work and Pensions
- Local Authorities
- Her Majesty's Revenue & Customs (HMRC)
- The Police

We may also share information with credit reference agencies, service providers or contractors and partner organisations, where the sharing of information is necessary, proportionate and lawful.

### **How to access the information we hold about you**

You have the right to request a copy of the information that we hold about you. If you would like to do so, please contact us by email or by post giving us as much detail as possible about the information you require.

See <https://www.severnarts.org.uk/contact/>

We will need to confirm your identity before any information can be provided.

You will then receive a copy of the information held about you along with an explanation of any codes used or other clarification that may be necessary.

### **Requesting that someone else look at your information on your behalf**

You can request that someone else looks at your records on your behalf. To do this you will need to give us consent in writing informing us of who you want to look at the information for you. If a relative or someone else wishes to look at the records

of a person who is not able to give their consent, this will only be allowed where it can be shown to be in the best interest of the person concerned.

### **How to contact us**

To exercise any of your rights under the General Data Protection Regulations (GDPR) please contact us:

by email – <https://www.severnarts.org.uk/contact/>

by telephone – 01905 947300

by post – *Severn Arts, Suite 11, Malvern Gate, Bromwich Road,  
Worcester, WR2 4BN*

If you are not happy with the response you receive from us you have the right to make a complaint to a supervisory authority:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

### **Equalities information**

We may use information such as your ethnic background, first language, gender, sexual orientation and age to gather statistics about the population of the area and the take up of our services. This is to help comply with our reporting obligations for the use of public money and to plan the provision of services in the future.

Such analysis will not identify individuals or have impact on entitlement to services and facilities.