

## **REACHOUT ARTS UK PRIVACY POLICY**

ReachOut Arts UK is committed to protecting you and your child's personal information. We promote a safe environment for all our students, customers, casual and freelance workers and everybody who comes into contact with us, both physically and online.

This Privacy Statement relates to the use of any personal information provided to us online or via application forms, telephone, email exchange, letters or correspondence.

Whenever you provide such information, we are legally obliged to use your information in line with current legislation concerning the protection of personal information, including the Data Protection Act 1998 and the General Data Protection Regulations.

### **DATA PROTECTION PRINCIPLES**

The 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

### **YOUR RIGHTS**

The legislation conveys various individual rights. These include the following:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

## **WHAT INFORMATION DOES REACHOUT ARTS UK HAVE ABOUT ME?**

The legislation requires that there is a clear legal basis for processing personal information. In general ReachOut Arts UK rely on the individual's consent in order to process their data.

When you enrol onto a ReachOut Arts activity, we may collect and store personal information about you. This may include information such as your name, email address, postal address, telephone or mobile number and date of birth, depending on how you are engaging with us. By providing these details, you enable us to provide you with the products or services that you have chosen..

When taking pictures of or classes in action or filming performances, ReachOut Arts UK ask for parental permission via a consent form, firstly on your original enrolment form and secondly prior to each performance. ReachOut Arts UK may use this footage, and any reproductions or adaptations of the images for marketing purposes.

This might include (but is not limited to), the right to use them in their printed and online publicity, social media, press releases and funding applications.

ReachOut ARTS UK will NEVER share your personal information with third parties, unless clearly stated. We will NEVER sell your data, and neither do we buy data from third parties.

## **HOW WILL YOU USE MY PERSONAL INFORMATION?**

We will use your personal information for various reasons including:

To provide you with information about our products, services and activities and to deal with your requests and enquiries, including complaints

For admin. reasons, which means that we may contact you for reasons related to the service or activity you signed up for this may include changes of details regarding a class you attend.

To contact you about an application you have made

To process your application for employment and where applicable your employment once appointed

As and when we need to use your personal information for reasons other than the ones specified above, we will ensure that we notify you first. You will be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed above.

## **USE OF DATA PROCESSORS**

Data processors are third parties who provide services for 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. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

## **POSTING**

When sending letters, parcels, publications and purchases we will share your postal address with the delivery service (Normally Royal Mail or Parcel Force).

## **WEBSITE HOSTING**

We use a third party service, for our website we use Wix.com as our host. Wix.com are contractually obliged to treat any information on our private website as confidential and are GDPR safe.

## **CRB/DBS SERVICE**

A DBS checking service for ReachOut Arts UK teachers and assistants is carried out by Shropshire Youth Service, Information provided by them to ReachOut Arts UK will only be shared with the individual concerned.

## **REGISTERS/ INVOICING/ DATABASE**

For our ReachOut School of Arts and After School club sessions where parents liaise directly with ReachOut Arts UK, We use a third party service, MemberMeister, this is cloud based software that stores your information and uses it for administrative purposes such as timetables, registers, emailing and invoicing customers. Membermeister is GDPR safe and only accessible in full capacity by ReachOut Arts UK principals, and for registers/emergency contacts and medical notices/ media consent/first aid consent by ReachOut Arts UK teachers.

## **REACHOUT ARTS UK MAY BE IN TOUCH ...**

To send you relevant communications for payment of fees and changes to classes

In relation to any service or activity you have signed up for in order to ensure that we can deliver the services to you

In relation to any correspondence we receive from you or any comment or complaint you make about our products or services

To send you information you requested when you voluntarily contacted us via email, phone, through the website, in person or via social media.

## **FOR THOSE UNDER 18...**

If you are under 18 and you provide us with information on an application form (online or printed), your parent(s)/guardian(s) permission will be required.

## **HOW LONG WILL REACHOUT ARTS UK KEEP MY INFORMATION?**

We keep the information we hold about our customers and students for as long as is necessary to deliver the services we are providing you with. If you are a regular student who does not return to a new term we will archive your details for one term, this will then be deleted at the start of the following term unless you have alerted us you will be returning. If you have taken a break and returned following a 2 term break you will be required to re enrol and complete paperwork as if you were a new student.

## **WHERE IS MY INFORMATION STORED?**

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 and which are located in secure facilities.

The security measures described above ensure that 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 online.

## **HOW CAN I FIND OUT WHAT INFORMATION REACHOUT ARTS UK HOLD ABOUT ME?**

You have the right to access certain personal information held about you. If you wish to make a Data Subject Access Request, please contact [gem@reachoutarts.co.uk](mailto:gem@reachoutarts.co.uk) or [saskia@reachoutarts.co.uk](mailto:saskia@reachoutarts.co.uk)

## **LEGAL OBLIGATION**

We may disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request.

## **REACHOUT ARTS UK GDPR POLICY**

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 came 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.

ReachOut Arts UK is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, 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.

ReachOut Arts UK is not required to be registered with the ICO (Information Commissioners Office)

## **GDPR STATEMENT**

### **1) THE RIGHT TO BE INFORMED**

ReachOut Arts UK 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 along with any SEN or medical requirements.

We are required to collect certain details of visitors and chaperones to our Theatre 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 Procedures.

Although our teachers are freelance, ReachOut Arts UK is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers and in some cases, 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. DBS Numbers and date of issue are also held on a central staffing record. Copies of teachers DBS are shared with the respective schools in which the teachers work in for Safeguarding purposes.

ReachOut Arts UK uses Google Analytics on its website but does not gain any personal data from this.

## **2) THE RIGHT OF ACCESS**

At any point an individual can make a request relating to their data and ReachOut Arts UK will need to provide a response (within 1 month). ReachOut Arts UK 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 ERASE**

You have the right to request the deletion of your data where there is no compelling reason for its continued use. However, ReachOut Arts UK has a legal duty to keep children's and parents details for a reasonable time, ReachOut Arts UK retain these records on our online system for 2 terms after leaving the theatre school, scanned original enrolment forms are kept on a passworded system for 2 years after the student leaves, children's accident and injury records are kept for 19 years (or until the child reaches 21 years), and 22 years (or until the child reaches 24 years) for Child Protection records.

Teachers records must be kept for 6 years after the member of leaves, before they can be erased.

This data is archived securely onsite and shredded after the legal retention period.

#### **4) THE RIGHT TO RESTRICT PROCESSING**

Parents, visitors and staff can object to ReachOut Arts UK 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**

ReachOut Arts UK requires data to be transferred from one IT system to another; such as from ReachOut Arts UK to the Local Authority, for performance BOPA licences. 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. ReachOut Arts UK does NOT use personal data for such purposes.

### **STORAGE AND USE OF PERSONAL INFORMATION**

- All paper copies of children's and staff records are scanned and stored in a passworded file on our IT system. Paper copies are stored in a locked filing cabinet at ReachOut Head Office, High Street, Bridgnorth. 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, such as, a weekly register, medication forms, referrals to external agencies and disclosure forms. These documents include data such as children's names, date of birth, contact numbers and sometimes address. These records are shredded after the relevant retention period.

- ReachOut Arts UK collect a large amount of personal data every year including; names and addresses of those on the waiting list. These records are shredded and deleted from IT systems if the child does not attend or added to the child's file and stored appropriately.
- ReachOut Arts UK store personal data held visually in photographs or video clips or as sound recordings, and written consent has been obtained via the photo and video consent form/permission to Perform agreement form. No names are stored with images in photo albums, displays, on the website or on ReachOut Arts UK social media sites. With the exception of the star student award which does state first name only.
- Access to all ReachOut Arts UK computers and the MemberMeister database for registers is password protected. When a teacher 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.

**ReachOut Arts UK agree to:**

- 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

***Policy created for ReachOut Arts UK – May 2018***

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