



GDPR Policy

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| *Approved by:* | *Bronwen Patching* | *February 2024* |
| *Checked by:* | *Roger Davinson* | *February 2024* |
| *Next review due:* |  | *Spring 2025* |

ACPA is dedicated to complying with the new GDPR rules that came into force on March 25th 2018. The following data protection policy applies to our collection of only necessary data that falls within the remit of a Performing Arts School and College. We retain the information necessary to administer our programs and maintain the well being of our clientele, most of whom are under 18.

On this basis, therefore, the following stipulations are made:

* The College will maintain and secure accurate contact details for the parents of its students;
* The College will also request a third-party emergency contact for use in the event that we cannot contact a parent – it is assumed that the parent has permission to deliver this third-party information;
* The College is required to maintain some information about the health and medical history of our students – this is for their safety and well being.
* The College will never share with or sell your data to another organization.

Adagio School collects and uses information about people with whom it communicates.

This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material. The college regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain confidence between those with whom it deals. To this end Adagio fully endorses and adheres to the Principles of Data Protection, as set out in the General Data Protection Regulation (GDPR) (EU) 2016/679.

## ****Purpose****

The purpose of this policy is to ensure that the staff and volunteers of Adagio are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place, which are consistently followed.

**Principles**

GDPR policy pertains to the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and covers computerized records as well as manual filing systems and card indexes.

Data users must comply with the data protection principles of good practice, which underpin the Act. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

To do this Adagio follows the eight Data Protection Principles outlined below:

* Personal data will be processed fairly and lawfully
* Data will only be collected and used for specified purposes
* Data will be adequate, relevant and not excessive
* Data will be accurate and up to date
* Data will not be held any longer than necessary
* Data subject’s rights will be respected
* Data will be kept safe from unauthorized access, accidental loss or damage
* Data will not be transferred to another country or territory

The principles apply to “personal data” which is information held on computer or in manual filing systems from which they are identifiable. Adagio ’s employees, volunteers and trustees who process or use any personal information in the course of their duties will ensure that these principles are followed at all times.

## ****Procedures****

The following procedures have been developed in order to ensure that Adagio meets its responsibilities in terms of Data Protection. For the purposes of these procedures data collected, stored and used by Adagio falls into 2 broad categories:

1. The College’s internal data records; Staff, volunteers.

2. The College’s external data records; Members, customers, clients.

The College as a body is a DATA CONTROLLER under the Act, and the Director is ultimately responsible for the policy’s implementation.

**Internal data records**

## ****Purposes****

The College obtains personal data (names, addresses, phone numbers, email addresses), application forms, and references and in some cases other documents from staff, volunteers. This data is stored and processed for the following purposes:

* Recruitment
* Equal Opportunities monitoring
* Volunteering opportunities
* To distribute relevant Adagio material e.g. meeting papers
* Payroll

## ****Access****

The contact details of staff and volunteers will only be made available to other staff and volunteers. Any other information supplied on application will be kept in a secure filing cabinet and is not accessed during the day to day running of Adagio.

Contact details of staff and volunteers will not be passed on to anyone outside the Adagio without their explicit consent.

A copy of staff and volunteer emergency contact details will be kept in the Emergency File for Health and Safety purposes to be used in emergency situations e.g. fire/ bomb evacuations. Staff and volunteers will be supplied with a copy of their personal data held by Adagio if a request is made.

The addressee must open all post marked confidential only.

## ****Accuracy****

Adagio will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for 6 years after an employee or volunteer has worked for the Adagio and brief details for longer. Unless the Adagio is specifically asked by an individual to destroy their details it will normally keep them on file for future reference. The Director has responsibility for destroying personnel files.

## ****Storage****

Personal data is kept in paper-based systems and on a password-protected computer system. Every effort is made to ensure that paper-based data are stored in organized and secure systems.

Adagio operates a clear desk policy at all times.

## ****Use of Photographs****

Where practicable, Adagio will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the Adagio will remove any photograph if a complaint is received. This policy also applies to photographs published on the Adagio website or in a Newsletter.

## ****Disclosure and Barring Service****

Adagio will act in accordance with the DBS’s code of practice.

## ****Responsibilities of staff and volunteers****

During the course of their duties with Adagio, staff and volunteers will be dealing with information such as names/addresses/phone numbers/e-mail addresses of members/clients/volunteers. They may be told or overhear sensitive information while working for Adagio. The Data Protection Act (1988) gives specific guidance on how this information should be dealt with. In short to comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Staff, paid or unpaid must abide by this policy.

## ****Compliance****

Compliance with the Act is the responsibility of all staff, paid or unpaid. Adagio will regard any unlawful breach of any provision of the Act by any staff, paid or unpaid, as a serious matter which will result in disciplinary action. Any employee who breaches this policy statement will be dealt with under the disciplinary procedure, which may result in dismissal for gross misconduct. Any such breach could also lead to criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy statement should in the first instance be referred to the line manager.

## ****Retention of Data****

No documents will be stored for longer than is necessary. All documents containing personal data will be disposed of in accordance with standard Data Protection principles.